



**Wildlife Division
1420 East 6th Avenue
Helena, MT 59620**

**DECISION NOTICE
and
Finding of No Significant Impact
for the
Emergency Grazing and Haying Leases on Select
FWP Wildlife Management Areas**

August 23, 2021

Description of Proposed Action

In response to the extreme drought conditions across Montana, Fish, Wildlife and Parks (FWP) developed a proposal to make available one-time haying and grazing leases on portions of selected wildlife management areas (WMAs) intending to accomplish two overarching goals:

1. Allow haying or grazing in areas where such treatments would generally benefit wildlife habitat and
2. support local ranching operations that are experiencing the substantial effects of drought.

FWP conducted an evaluation of all prospective sites where emergency haying or grazing might occur. The list of possibilities was reduced to those areas where habitat benefits were likely, treatment timing fit with vegetation condition, and where conflicts with wildlife, neighbors, or recreationists were less likely. WMAs or parts of WMAs where grazing or farming leases already occur were also dropped from consideration to avoid conflicts with existing lease obligations. This review process, conducted by FWP regional and program staff, resulted in a recommendation for up to 15 haying/grazing leases involving 14 WMAs, totaling 208 acres of haying and 7,048¹ acres of grazing opportunities. Leases would conclude by October 31, 2021. If substantial conflicts were to emerge which couldn't be effectively mitigated, FWP would retain authority to not proceed with the affected lease(s).

¹ The number of leases and acreage have changed from what was presented in the draft environmental assessment due to one of the lease opportunities being dropped. See **Summary of Edits for the Final Environmental Assessment** for more information.

Montana Environmental Policy Act (MEPA) Process and Public Involvement

FWP released a draft environmental assessment (EA) for public review on July 30, 2021. The public comment period closed at 5:00, August 13, 2021. Public notification of the EA process included a statewide news release, email notification through a statewide interested persons mailing list, and posting on the FWP website.

The EA evaluated potential impacts of the Proposed Action and identified mitigation measures that would be incorporated as part of the Proposed Action.

Summary of Public Comment

FWP received a total of 182 comments, of which 104 were generally against the proposed action, 66 were generally supportive of the proposed action, 11 were neutral, and one supported haying but didn't support grazing. All comments, in their original form, are included in Appendix A of this Decision Notice.

The following is a summary of questions and issues raised by commenters and FWP's responses. *Please note*, there was an error with page numbering in the Draft EA, the first page was numbered "13" and counted up from there. This Decision Notice includes changes that are incorporated into a Final Environmental Assessment. References herein to EA page numbers will be as they appear in the FINAL EA.

- Several concerns were expressed about setting a precedent or making this a common practice.

FWP Response: The Proposed Action would be a temporary one-time lease opportunity that does not extend beyond October 31, 2021. If there were interest in pursuing new agricultural leases, FWP would conduct a new environmental analysis and public review process.

- Some commenters suggested that FWP should consider making these leases permanent.

FWP Response: Managing vegetation on WMAs can serve a variety of purposes, but primarily is intended to enhance wildlife habitat for one or more target wildlife species or to suppress weeds or other vegetation that deteriorates habitat values and potentially impacts neighboring properties. The proposed temporary leases are intended to improve habitat conditions on sites that have been idled for a number of years. Conducting these treatments on a more frequent basis, such as annually, would potentially detract from the habitat values FWP is managing for.

- A commenter questioned the value of hoof action for helping establish seedlings of beneficial vegetation during a drought year of low seed production.

FWP Response: The potential benefit of seed trample and subsequent seedling production is affected by many factors including spring moisture, exposed soil surface, and post-grazing rest to protect seedlings. With variables outside of FWP control, there is never a guarantee as to the results. Seed produced during current and past growing seasons would be subject to the proposed grazing treatments. FWP would idle these sites in subsequent years.

- Commenters expressed concerns about the potential for spreading weeds or bringing new weeds into an area and the cost to FWP for subsequent monitoring and potential weed treatment. One commenter suggested a requirement to feed cattle certified weed-free hay prior to grazing on a WMA.

FWP Response: The EA recognized the potential for weed spread (EA, Page 16) through bringing in livestock or haying equipment from outside of the area. Ensuring clean equipment will help address haying operation concerns. There is more uncertainty with regard to livestock grazing. Proceeding with either type of lease would necessitate monitoring treatment areas in subsequent years. This work by FWP would be integrated into existing weed management strategies already occurring on WMAs. Consistent with FWP's statewide weed management strategy, any new weed starts would be a high priority for control/elimination. Outside of coordination and possible weed management, the intended habitat improvements derived from these leases are not expected to require much additional expenditure by FWP.

The potential for importing noxious weed seeds that do not currently occur in the area is a concern of the department. In response to this concern and other suggestions referred to later in this EA, FWP has included in the Final Environmental Assessment, to be eligible for a lease, producers must operate in the same county as the lease area or the adjacent county if the lease occurs within 5 miles of a county line (e.g., Blacktail, Dodson Dam WMAs).

- Several comments expressed concern about the impact of these leases, reducing wildlife cover and forage, affecting hiding cover for upland game birds and forage for ungulates, particularly elk that could end up wintering on adjacent private lands. One commenter expressed specific concern about "grazing cattle on Fleecer, which is critical winter range". Some comments similarly expressed concern about impacts to fall hunting opportunity.

FWP Response: A description of the selection process for identifying viable haying and grazing leases was provided in the EA (EA, Pages 5, 15). This included considering the condition of vegetation (i.e., would it benefit from a treatment) and potential near-term conflicts with wildlife habitat needs and hunting recreation. As mentioned in the EA, most WMA properties were dropped from consideration based on a lack of anticipated habitat benefits or the potential conflicts outweighed intended benefits. FWP believes the selection process leading up to the development of this proposal has considered these expressed concerns. The proposed one-time treatment sites are intended to be offset in part with surrounding undisturbed wildlife habitats associated with each affected WMA. As is often the case with habitat enhancement treatments, there may be temporary negative impacts that are offset by longer term benefits to habitat condition, resulting in improved habitat productivity or attractiveness to wildlife.

Pertaining the question of grazing on Fleecer WMA, the proposed grazing lease is on a parcel approximately 9 miles north of the main Fleecer WMA. The parcel was included as part of the acquisition of the main Fleecer property. Elk winter in the vicinity of these parcels, but they are not critical winter range as does occur on the main part of Fleecer WMA.

- Some comments suggested these proposed leases are driven by private business or special interests seeking to profit off wildlife or wildlife management areas.

FWP Response: The EA describes the primary intent of these leases to make improvements to existing wildlife habitats. FWP has a lengthy history of working with local producers through agricultural leases to accomplish wildlife habitat conservation and enhancement outcomes. There are many examples across the conservation community in Montana and nationwide that demonstrate how such approaches can be a win-win for conservation and agricultural production, including on lands that are dedicated to supporting wildlife habitat and related recreation opportunities. One of the first in the United States to offer this approach was Aldo Leopold, considered by many to be the Father of Wildlife Management, as he summed up, “The central thesis of game management is this: game can be restored by the creative use of the same tools which have heretofore destroyed it -- axe, plow, cow, fire, and gun.” (Leopold 1949). Each of the agricultural leases administered by FWP are managed to accomplish tangible wildlife habitat benefits. As some commenters to the EA recognized, the less tangible benefits and relationships derived from such arrangements are a common and often substantial secondary result.

- Some comments questioned about not charging a fee for the proposed one-time leases.

FWP Response: As described in the EA (Page 2), the department is not required by law to charge a cash fee for agricultural leases but has the latitude to enter into leases of land under its control in exchange for services to be provided by the lessee on the leased land (MCA 87-1-209(7)). The department's two goals with these leases would be to improve habitat conditions and provide some benefit to local producers. Each of these lease opportunities would require considerable inputs by the lessee, such as providing and installing temporary fencing, fence repairs, hauling water, dealing with hay equipment hazards, and the like. The current forage value of these lease sites is marginal due to drought. In order to make this work for both parties, FWP believes charging standard fees rates or requiring competitive bids are not suitable approaches under these conditions.

- Some commenters expressed the notion that FWP is not being science-based in their approach to apply livestock grazing as a treatment for benefiting wildlife habitat. Some also expressed concern over the proposal's impact on biodiversity.

FWP Response: Vegetation, and particularly grasslands, are adapted to disturbances including fire, grazing, trampling, soil disturbance (e.g., fossorial mammals or earth worms), and drought, which have coexisted for millennia (Blair et al. 2014). Changes to wildlife habitats affect habitat functions, which can be positive, negative, or neutral, depending on species of wildlife, seasonal habitat, vegetation conditions, and other such factors. Livestock grazing and haying can be used to predictably achieve habitat changes that are well suited for target wildlife species. Commenters offered a variety of ecological studies documenting negative outcomes on wildlife and habitats relating to livestock grazing. In FWP's review of these citations, it was apparent that none of the studies were directed at the purposeful use of livestock grazing to achieve habitat objectives. FWP offers this sampling of citations, examples of managing livestock and applying grazing treatments to accomplish wildlife habitat objectives:

Birds: Davis et al. 2020, Derner et al. 2009, Bica et al. 1982, Paton and Dalton 1994 and others describe the role that livestock grazing can play in establishing structural diversity in grasslands to attract different species of breeding grassland birds. In the context of WMAs, treating some areas with livestock grazing while leaving other areas idle provides options for breeding birds to select structural features that are more suitable for meeting their breeding habitat preferences. Livestock grazing in patches potentially adds biodiversity by providing more structural diversity, supporting a variety of nest site characteristics.

Ungulates: Crane et al. 2001, Frisina 1992, Grover and Thompson 1986, Willms et al. 1979 and others have described how targeted livestock grazing can make feeding areas more attractive to elk and deer. In the context of WMAs, treating some areas with

livestock grazing while leaving other areas idle provides a variety of foraging options. The forage value of different treatments changes with season. Treatments are intended to enhance the overall attractiveness of the WMA, potentially reducing game damage on neighboring private lands.

Wildlife Habitat in General: Krausman et al. 2009, Papanastasis 2009, Vavra 2005, Frisina and Morin 1991, and many others have recognized how livestock grazing can be applied and adjusted to support habitat restoration and wildlife habitat needs, particularly in prairie environments adapted to grazing by native ungulates. In the context of WMAs, biologists consider the condition of vegetation and the intended wildlife habitat functions that the particular site is intended to provide. Livestock grazing can be used as a tool to manipulate vegetation conditions to advance habitat objectives. As the EA described, there may be near-term and localized impacts, but those impacts do not outweigh the habitat benefits sought by this proposal.

Finally, Habitat Montana is intended to provide a variety of wildlife-related benefits (EA, Page 4), including promotion of habitat-friendly agriculture. Utilizing farming, livestock grazing, and forestry to accomplish wildlife habitat objectives is fully aligned with the intent of the Habitat Montana program.

- Comments expressed concern about the impacts of haying and grazing on vegetation and the disruption to plant physiology.

FWP Response: The proposed haying and grazing treatments would be applied after most herbaceous plants have gone dormant. Harvesting foliage during this time frame would have little negative effect on plant physiology. Shrubs may still be green at this time but a one-time grazing treatment would allow for recovery if they do receive some browsing by livestock. Haying would not be applied in shrub habitats.

- Comments expressed concern about the potential for disease transmission and predator conflicts between livestock and wildlife.

FWP Response: The EA states “If mitigation measures are unavailable for circumstances that could result in wildlife conflict, FWP would retain flexibility to forgo establishment of such a lease arrangement.” This would include potential issues related to disease transmission or predation or other conflicts that are unforeseen at this time. To further reduce the potential for conflicts, requirements of each lease would be customized for the unique circumstances of individual WMAs.

Related to disease concerns, the Blacktail WMA is located within the Brucellosis Designated Surveillance Area. Producers that may be interested in this lease opportunity would be required to comply with Montana Department of Agriculture rules pertinent to this area designation.

- Many comments emphasized the potential benefit to neighbors of the WMAs and one comment recommended giving priority to producers who operate in close proximity to the affected WMAs.

FWP Response: A goal of this proposal is to “support local ranching operations...” (EA, Page 4). The EA did not define “local”. In response to these comments (as well as concerns mentioned earlier about the potential for bringing in weed seeds from outside the area), FWP will add information to the Final Environmental Assessment that clarifies to be eligible for a lease, producers must operate in the same county as the WMA, or the adjacent county if the WMA occurs near a county line (e.g., Blacktail, Dodson Dam WMAs).

- Comments expressed concerns about grazing impacts on riparian habitats.

FWP Response: Riparian habitat potentially affected by the Proposed Action would predominantly involve the Blacktail WMA. As the EA described (Pages 15-16), grazed areas would receive hoof action, vegetation trampling, and possibly areas of soil compaction and sedimentation. All of these impacts would be temporary. This area comprises old hay fields that are slowly being replaced with native riparian vegetation as the stream channel migrates across the flood plain and beaver activity continues to flood new areas. As a one-time grazing treatment, which is expected to make smooth brome more palatable to elk while helping support a local producer, FWP believes the values of this treatment outweigh temporary impacts. This treatment has also been reviewed and supported by local fisheries staff.

- Some comments encouraged FWP to conduct an evaluation of leased areas upon completion of the lease treatments.

FWP Response: Department staff will at least anecdotally review treated areas to document site condition post-treatment, as well as vegetation response during the 2022 growing season. These areas will also be the focus for weed monitoring.

- Several commenters recommended the department require various forms of public hunting accessibility on a producer’s land as a prerequisite to participating in the emergency haying or grazing leases.

FWP Response: The intent of this proposal is to provide support for local producers affected by extreme drought while making habitat improvements on selected WMAs. Given the nature of these challenging times, FWP felt it was not appropriate to add additional requirements beyond the fundamental purposes of this proposal. FWP does expect that helping producers in times of need opens the possibility for future collaboration on the topics of conservation and recreation.

Summary of Edits for the Final Environmental Assessment

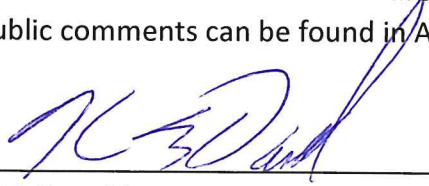
The Final Environmental Assessment will include changes to the Draft EA in response to public comments, as well as information that has become apparent during the public comment period. The following are a summary of edits:

- 1) Part of the intent of this proposal is to support local producers while minimizing the chances of importing new species of noxious weeds. To further refine this proposal, only producers operating in the county where a lease is available would be eligible for participation in the respective lease. If the lease area is within 5 miles of an adjacent county, producers in that adjacent county would also be eligible. See Table 1 in the Final EA, pages 6-8 .
- 2) The north unit that was proposed as a grazing lease on Fleecer WMA has been removed from consideration due to a lack of access through adjacent property. This will result in changes to this map and total acreages.
- 3) FWP determined the originally proposed haying lease on Ninepipe WMA would better serve the need of producers by splitting into 3 separate hay leases, which could accommodate up to 3 different producers.
- 4) FWP determined the lease opportunity on Rookery WMA would only be suitable for haying, given the small and scattered seeded grass plots involved.

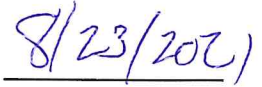
Final Decision

Through the public review process, the public raised some issues/concerns with the proposal, which have been addressed in this decision document and the Final EA. FWP found no significant impacts on the human or physical environments associated with this proposal; therefore, the EA is the appropriate level of analysis and an environmental impact statement is not required.

In reviewing all the public comment and other relevant information, and evaluating the environmental effects, I approve proceeding with the Proposed Action, Alternative B, as described in the Final EA. Noting and including the responses to public comments, this Decision Notice and the Final EA will serve as the final documents for this proposal. The full set of public comments can be found in Appendix A.



Ken McDonald
Wildlife Division Administrator



Date

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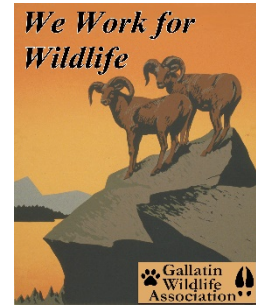
APPENDIX A

EMERGENCY GRAZING AND HAYING LEASES ON SELECT FWP WILDILFE MANAGEMENT AREAS

PUBLIC COMMENTS RECEIVED DURING THE COMMENT PERIOD

**GALLATIN WILDLIFE
ASSOCIATION**

P. O. Box 5317
Bozeman, MT 59717
(406) 586-1729
www.gallatinwildlife.org



August 10, 2021

Rick Northrup
Habitat Bureau Chief
Montana Fish, Wildlife and Parks
P.O. Box 200701
Helena, MT 59620

Dear Mr. Northrup:

In recent weeks, the Department of Montana Fish, Wildlife and Parks (FWP) publicly disclosed they were planning to open a select group of wildlife management areas (WMA) around the state to livestock grazing and haying interests as a result of drought conditions hampering the state. The draft environmental assessment released on July 30, 2021 specifies the scope of this program. The list of 14 different WMAs encompasses a range of acreages from 8 to 4100 acres. In reviewing the treatment rationale for this action, FWP seems to be relying back on the old theory that livestock grazing and associated actions are good for at least most wildlife. Please cite the research that backs this statement. In the past, The Gallatin Wildlife Association (GWA) has submitted many peer-reviewed articles contrary to this theory. GWA is not convinced this proposed action by FWP is as sound as it is being promoted.

First let us describe why the Gallatin Wildlife Association has an interest in this issue. We are a local, all volunteer wildlife conservation organization dedicated to the preservation and restoration of wildlife, fisheries, habitat and migration corridors in Southwest Montana and the Greater Yellowstone Ecosystem, using science-based decision making. We are a nonprofit 501 (c)(3) organization founded in 1976. GWA recognizes the intense

pressures on our wildlife from habitat loss and climate change, and we advocate for science-based management of public lands for diverse public values, including but not limited to hunting and angling.

The first thought that came to mind is what is FWP doing to mitigate the effects of drought and climate change on wildlife? These lands were set aside, designated to be for wildlife. Where is the concern of how drought conditions are affecting our biodiversity, flora and fauna? This organization has tirelessly raised the issue of how livestock grazing has affected the quality of riparian and other habitats on several WMAs for more than 10 years. Has there been any progress in the habitat status of these lands? One would think that when it came time for emergency use, such as in times of drought, wildlife designated lands would have first priority for the purpose for which they were intended. Why does this not seem to be the case? We think we know why, but we want to express our disappointment in the priorities and tone chosen by FWP at this time. The picture below highlights our concern of past actions in how livestock have deteriorated riparian habitat.



This picture is of Fleecer WMA taken on June 3, 2015. Note the hoof action by livestock on this resource, and the lack of woody riparian vegetation. This is not proper wildlife habitat management. We hope this condition would not be allowed to perpetuate, especially in times of drought. One would only hope this condition has been rectified and repaired.

Basically, GWA is not reassured. We have not seen evidence where FWP has changed its policy toward wildlife when it comes to the proper management and priorities on WMAs. In fact, on page 16 of the draft EA, there is a statement indicating that FWP already manages 40 farming, grazing and haying leases on 24 different WMAs within the system. This raises the question, when will wildlife obtain the priority they deserve? Livestock grazing will increase more soil compaction, more soil erosion around riparian areas, place wildlife in competition with livestock for food, increase likelihood of weed infestation and place more human activity on wildlife habitat. We don't see the overall benefit here for wildlife. We don't automatically buy into the proclaimed theory by FWP that livestock grazing improves the habitat for elk or other ungulates. Again, we would like to see the evidence and science of this fact. Most science we have seen is contrary.

Moreover, we have suggested that FWP test its theory that livestock grazing is enhancing any big-game herd using an experimental design including randomization, replication and controls. Across 24 WMAs, there must be several good opportunities to test if private livestock grazing on a WMA has achieved stated FWP goals. Such testing is the essence of adaptive management.

What some species may benefit from livestock grazing, could very well likely be detrimental to others. Biodiversity takes a hit and if there is one thing we must do during times of drought; it is to protect the biodiversity. Placing crops upon the land is the opposite of that goal. Our fear is based upon the fact that so many times agencies promote actions utilizing the best management practices, but in reality, those practices don't seem to materialize. We may have good intentions, but we as a people and those properly assigned government agencies are poor in the follow through. We have seen no evidence this will change.

For all of these reasons, GWA cannot support the policy as stated in the draft EA as Alternative B, the Proposed Alternative. We are not sure that FWP has earned the trust of our organization to support such action. therefore, we favor Alternative A, the No Action Alternative. We believe this action is politically based, reflecting the political dominance of the Montana livestock industry. That said, we recognize the appropriateness of FWP being a good neighbor when there can be collaboration that allows only a minimum of new stress upon our wildlife in the short term. We recommend that FWP review the list of emergency grazing projects and eliminate those for which the potential for significant impacts to wildlife habitat cannot be verified.

FWP states the following in the draft EA itself. Page 15 of the draft EA states.

“Montana’s Wildlife Management Areas (WMAs) provide a system of lands managed by FWP for the primary purpose of providing effective wildlife habitat and secondarily supporting recreation opportunities that are compatible with wildlife.”

We believe that FWP needs to return to that original purpose. There is no better time to do so than now.

It is ironic that at the time we are writing these comments, the United Nations Intergovernmental Panel on Climate Change has come out with a new report calling the status of the world’s climate as “Code Red for Humanity” claiming that the wild weather events will worsen as a result of climate change. If this is the description for our species, what would it be for the variety of other species existing on this planet? This is the warning that we are trying to raise. Agencies who are responsible for wildlife, state, tribal and federal, must not ignore the conditions on the ground, yet it seems like that is exactly what is happening. At some point, wildlife must become the priority. We repeat, there is no better time than now.

Sincerely,

A handwritten signature in cursive script that reads "Clinton Nagel".

Clinton Nagel, President
Gallatin Wildlife Association

Havre Rifle and Pistol Club
Charles ("Bing") Coe President
P.O. Box 1770
Havre, MT 59501

August 11, 2021

Montana Fish Wildlife and Parks, Rick Northrup by email rnorthrup@mt.gov

P.O. Box 200701

Helena, MT 59620

RE: Comment to Environmental Assessment to issue annual grazing or haying authorizations on Wildlife Management Areas for vegetation management and drought relief to local agricultural operations.

The Havre Rifle and Pistol club has an active shooting range on the Rookery WMA. We take pride in how we are managing the shooting range including mowing parts of the range where there might be risk of fire hazards. Wildlife commonly use the range oblivious to shooting activity on the range.

Though the shooting range is a small part of the Rookery area our members do pay attention to what is happening on the rest of the WMA.

In the EA, only small tracts within the Rookery WMA will be either hayed or grazed, none of which are on the shooting range area. We do not object to haying or grazing on the designated tracts and recognize it could be useful for wildlife habitat. Since these tracts are not fenced independently and even if they were, they don't have existing water for livestock. That said, it appears that the practical use, for the time being, would be to hay the area. We suggest that grazing would be a better use and tool for managing the vegetation/forage and should be incorporated into overall management of the Rookery and likely other WMAs. Since grazing does not deplete nutrients of the site and leaves organic matter in manure, urine and trampled vegetation it would be a better management tool than haying where the forage is removed from the area. Grazing could be accommodated on practically all of the WMA with use of temporary electric fence and/or herding and temporary water facilities.

In our membership we have several farmers and ranchers and natural resource management trained individuals experienced in land and habitat management that would be willing to offer support to Mt FWP and NRCS in developing management plans for the Rookery WMA.

Respectfully,

/ Charles Coe /

Charles Coe, President; Havre Rifle and Pistol Club

cc: Scott Hemmer MtFWP Havre Biologist

Northrup, Rick

From: McClain, Kammi
Sent: Wednesday, August 11, 2021 8:54 AM
To: Northrup, Rick
Subject: FW: [EXTERNAL] Public comment on emergency haying and grazing leases

Hey Rick,

Here is an emailed comment. I will also file it to put it with the SurveyMonkey comments.

Thanks,

Kammi

From: FWP General <fwpgen@mt.gov>
Sent: Wednesday, August 11, 2021 8:53 AM
To: FWP Wildlife <fwpwld@mt.gov>
Subject: FW: [EXTERNAL] Public comment on emergency haying and grazing leases

From: Connie Lange <connielange712@gmail.com>
Sent: Wednesday, August 11, 2021 8:09 AM
To: FWP General <fwpgen@mt.gov>
Subject: [EXTERNAL] Public comment on emergency haying and grazing leases

Please direct this message to the appropriate FWP department:

I am opposed to emergency leases due to the current drought conditions. No agricultural product in Montana has a greater environmental impact than beef production. It is well documented that the carbon footprint to grow hay and feed corn for cattle is far greater than that of crops grown directly for human consumption. Current beef production practices are contributing to the climate crises we are experiencing.

I am not aware of any sustainable practices that beef growers have adopted to reduce their carbon producing impact. The Montana Stockgrowers consistently support political candidates who deny the realities of climate change. And, now, being part of our climate problem, beef producers want to elbow into public lands, extending their environmental impact to affect wildlife.

This summer is hot, dry and smokey. However, it is predicted to be cooler than summers to come. Should the leases go through, I urge FWP to negotiate concessions from stockgrowers that demonstrate good-faith efforts to adopt significant sustainable practices. I also want a firm promise that this is truly the one and only summer these leases ever happen. Ever.

I understand the importance of beef production to the state's economy and lifestyle. However, I am not willing to sacrifice public lands and wildlife for an environmentally costly food product that isn't really the healthiest food choice.

Respectfully,
Connie Lange

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Connie Lange
connielange712@gmail.com



Virus-free. www.avast.com [[avast.com](http://www.avast.com)]
[[avast.com](http://www.avast.com)]

August 6, 2021

Montana Fish, Wildlife and Parks
Attn: Rick Northrup
PO Box 200701
Helena, MT 59620

The Montana Sportsmen Alliance appreciates this opportunity to offer comments on the Draft Environmental Assessment for Emergency Grazing and Haying Leases on select FWP Wildlife Management Areas. Obviously, the severe drought we are currently experiencing is impacting the people of this state and the fish and wildlife resources we so highly value. We have reviewed the Draft EA and find it complete and thorough. We compliment the efforts of the Wildlife Habitat Bureau and the Regional Wildlife Managers in this undertaking. Too often, under these types of conditions, resource values are further degraded by management actions or in the case of river flows, the lack thereof.

We support the limited scope of the proposal and the one-time only frequency of the action. Maintaining important herbaceous cover for upland game birds and nesting waterfowl as well winter forage for big game species is critical. We would prefer the Department work with landowners who provide public access to their lands or work cooperatively with agency staff on existing leases. There will be noticeable impacts on certain WMAs and if this action is approved, we recommend department field staff continue their communication efforts with local stakeholders.

Montana Sportsmen Alliance Leadership Group
Joe Perry – Brady
John Borgreen – Great Falls
Don Thomas – Lewistown
Doug Krings – Lewistown
Steve Schindler – Glasgow
Dale Tribby – Miles City
JW Westman – Park City
Jeff Herbert – Helena
Ray Gross – Dillon
Robert Wood – Hamilton
Tim Thier – Eureka



**BACKCOUNTRY
HUNTERS & ANGLERS**
MONTANA

August 6, 2021

Rick Northrup, Habitat Bureau Chief
Montana Fish, Wildlife & Parks
PO Box 200701
Helena, MT 59620
rnorthrup@mt.gov

Re: EMERGENCY GRAZING AND HAYING LEASES ON SELECT FWP WILDLIFE MANAGEMENT
AREAS DRAFT ENVIRONMENTAL ASSESSMENT

The Montana Chapter of Backcountry Hunters & Anglers (MT BHA) represents approximately 3,000 dues-paying Montana members who care deeply about fish and wildlife habitat, public access and fair-chase practices. We strive to protect large parcels of backcountry habitat, as well as the opportunity for fair-chase hunting and fishing experiences. We submit these comments in response to Montana Fish, Wildlife & Parks' (FWP) proposal to implement emergency grazing and haying on portions of 14 Wildlife Management Areas (WMAs).

We have great sympathy for our ranching communities who are suffering from this drought. Additionally, it is incumbent upon us to note that according to FWP's website, hunter-funded WMAs, "are managed with wildlife and wildlife habitat conservation as the priority."

We acknowledge that grazing and haying have been shown to provide benefit to some wildlife species, namely ungulates, under specific conditions. However, WMAs were created to conserve vital habitat for a broad range of species. Additionally, grazing and haying are already allowed on many WMAs across the state, carefully designated with location and temporality for



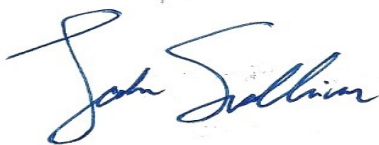
WWW.BACKCOUNTRYHUNTERS.ORG/MONTANA_BHA
MONTANA@BACKCOUNTRYHUNTERS.ORG

the benefit of wildlife and to limit competition for habitat resources between domestic livestock and wildlife. During this extreme drought year where natural competition is fierce, we're concerned that areas that were previously unfit for grazing and haying are now being considered to benefit privately owned non-native livestock. Additionally, wildlife displacement, loss of hunting opportunity, the potential spread of invasive weeds and degradation to riparian areas and the increased wildfire risks from motorized vehicles and machinery are all concerns that need thorough vetting.

In closing, Montana BHA feels for our ranching communities. We also firmly agree with FWP that WMAs should be managed with wildlife and wildlife habitat conservation as the clear priority. We respectfully ask that this emergency order include the following:

1. Implementation that universally improves winter feed for publicly owned wildlife, while taking into consideration the needs of other wildlife including upland game and ground-nesting birds who rely on plant growth for cover.
2. Grazing and haying priority be given to our neighbors who are currently enrolled in FWP's Block Management Program. Some 1,200 landowners are enrolled in Block Management and have generously opened their private lands for public hunting access; many of them could surely use the extra help, and if we're opening hunter-funded public wildlife management areas for private use, we would like to reciprocate their goodwill first and foremost.

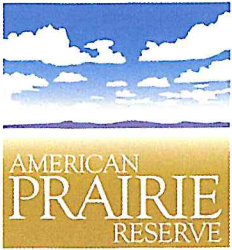
Sincerely,



John B. Sullivan III, Board Chair

The Montana Chapter of Backcountry Hunters & Anglers





P.O. Box 908
Bozeman, MT 59771
Tel: (406) 585-4600
Fax: (406) 585-7910
americanprairie.org

August 10, 2021

Mr. Rick Northrup
Montana Fish, Wildlife and Parks
P.O. Box 200701
Helena, MT 59620.

Dear Mr. Northrup:

I write to express American Prairie's support for Montana Fish, Wildlife and Parks proposal to establish emergency haying and grazing leases on portions of 14 the state's Wildlife Management Areas. We agree this effort will improve wildlife habitat while making forage available for area agricultural producers.

American Prairie is a significant land owner in North Central Montana and we annually provide grass on both our private and leased ground supporting nearly 14,000 head of cattle. Our leases with local cattle ranchers are generally three to five years and sometimes longer, providing certainty for established operators and opportunity for younger ranchers.

The current drought is creating hardship across North Central Montana and we are pleased to be able to provide access to grass for many of our neighbors and to support this proposal.

Sincerely,

Pete Geddes
Vice President and Chief External Relations Officer



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

Leslie Robinson, Chair
Montana Fish and Wildlife Commission
1420 E. Sixth Ave.
Helena, MT 59624

RE: 2021 Emergency WMA Grazing Leases

Chair Robinson and fellow commissioners,

The Montana Wildlife Federation (MWF) is our state's oldest and largest wildlife conservation organization. We have an 85-year record of working with landowners to resolve the many complex issues of managing our public trust wildlife resources, including habitat management. MWF formed when landowners joined hunters to restore depleted wildlife numbers and habitats. Decades later, quality wildlife habitat remains the most critical component of wildlife management. Montana is facing severe, albeit not unique, climatic challenges this summer. Water is in short supply for all, feed for livestock and wildlife is dwindling, and fires run rampant across our landscape. How hunters, ranchers, FWP, and others come together to address these current issues will directly impact future challenges we face. We must take a long-term approach.

CONCERNS: As stated in the Emergency Grazing and Haying Leases on Select FWP Wildlife Management Areas Draft Environmental Assessment, "Montana's Wildlife Management Areas (WMAs) provide a system of lands managed by FWP for the primary purpose of providing effective wildlife habitat and secondarily supporting recreation opportunities that are compatible with wildlife." MWF has the following concerns about the proposal:

- This action does not meet the intended benefits of the WMAs as stated in *ARM 12.9.510*.
- Montana's wildlife is not an expendable commodity to be exploited when climate change causes problems for agriculture.
- These WMAs are already drought-stressed and will provide little forage for livestock.
- To avoid potential damage to riparian areas should require extensive investment in fencing by stock owners. Without fencing, riparian damage in this drought period could be severe.
- The leases run through Oct 31st. The proposed period of livestock use will overlap with hunting seasons, potentially causing conflicts between hunters and livestock.
- FWP already offers grazing and haying opportunities on 24 WMAs. FWP only entered into those leases after careful planning to ensure they are successful and have no adverse effect on the resource. MWF is concerned that this abbreviated process does not provide the same level of consideration for issuing these emergency leases.
- There will be impacts on other species. If riparian areas were to be grazed by livestock, food sources such as berries and rose hips essential to bears, birds, and other species would be affected.

- WMAs were purchased with sportsperson's money to provide critical habitat for wildlife and reduce impacts on private land. The EA emphasizes the benefits to vegetation, and these benefits are most likely to begin accruing next spring 2022. Our concern is about the forage reduction on some of these WMA's for wildlife this coming winter. If livestock needs emergency grazing, then wild ungulates will also need access to forage in a year when it's in short supply. The hot, dry weather has also been tough on wild ungulates, and they will need forage this winter. Grazing on WMAs will inevitably displace beleaguered wildlife onto private property searching for sustenance, further exacerbating the problem of wildlife on private property that so many landowners have expressed concerns over. MWF is particularly concerned about proposed haying and grazing on the Fleecer, Blacktail, and Smith River WMAs, which have a history of use by wintering wildlife. Will the proposed leases push more wildlife onto private lands?
- MWF is very concerned that compromising WMAs now will create the expectation of doing this again as climate change impacts continue, potentially compromising these WMAs.
- We would like to point out that there are many existing Federal assistance programs to assist livestock owners concerning drought impacts on livestock. However, there are no assistance programs for wildlife other than maintaining a network of WMAs to help them find food and shelter during these extreme drought events caused by climate change.

DESIRED OUTCOME: MWF recommends that FWP carefully consider our concerns about this proposal before moving forward to allow haying and livestock grazing on wildlife management areas this year. MWF recognizes that farmers and ranchers face tough times and that private lands are used by wildlife and provide hunting and angling, and for that, we are appreciative. At the same time, MWF is very concerned because wildlife also faces similar challenges with reduced resources and water. MWF is not opposed to the one-time emergency use of some WMA resources. Still, we believe that a better approach is a collaborative look at handling these increasingly common droughts to find solutions that benefit and support Montana's wildlife which is also struggling along with livestock. We reiterate that we do not want to see the emergency use of WMAs for livestock become an annual expectation.

Our climate is changing, and with those climate changes come challenges for both wildlife and agriculture in Montana. We recommend that a comprehensive state-wide approach be developed to address the causes of climate change and carefully consider how we can assure that the needs of Montana's wildlife are considered as we move forward into a climate-changed future.

Best regards,



Tom Puchlerz

#1

COMPLETE

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Last Modified: Tuesday, August 03, 2021 8:55:12 AM
Time Spent: 00:01:03
IP Address: 98.127.172.19

Page 1

Q1

Please provide the following information:

Name: Robb d sager
City/Town: RED LODGE
State/Province: MT

Q2

Please comment on the Draft Environmental Assessment: Emergency Grazing and Haying Leases on Select FWP Wildlife Management Areas.

Seems like the right thing to do in these circumstances. Thanks Robb

#2

COMPLETE

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Started: Tuesday, August 03, 2021 8:57:01 AM
Last Modified: Tuesday, August 03, 2021 8:59:33 AM
Time Spent: 00:02:31
IP Address: 184.166.80.159

Page 1

Q1

Please provide the following information:

Name: Steven D Roney
City/Town: Missoula
State/Province: MT

Q2

Please comment on the Draft Environmental Assessment: Emergency Grazing and Haying Leases on Select FWP Wildlife Management Areas.

Give the farmers and ranchers all that you can! The state doesn't need the money and the people need the help!

#3

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Tuesday, August 03, 2021 8:59:07 AM
Last Modified: Tuesday, August 03, 2021 9:02:04 AM
Time Spent: 00:02:56
IP Address: 72.174.92.146

Page 1

Q1

Please provide the following information:

Name: Holley Woosley Vennes
City/Town: Wilsall
State/Province: MT

Q2

Please comment on the Draft Environmental Assessment: Emergency Grazing and Haying Leases on Select FWP Wildlife Management Areas.

Please open up any and all areas of public lands to haying or grazing for Montana Farmers and Ranchers.

This will help reduce the fuel load and lower fire risks and it will also be a big boost to producers who are in desperate need of some help.

The last few years have not been kind to our ag producers, let's help them out in anyway we can.

The strive to live with the land and wildlife, the least we can do is thank them by offering a helping hand when it is badly needed.

#4

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Time Spent: 00:02:58
IP Address: 98.127.138.6

Page 1

Q1

Please provide the following information:

Name: **Anne Wheeler**
City/Town: **West Glacier**
State/Province: **MT**

Q2

Please comment on the Draft Environmental Assessment: Emergency Grazing and Haying Leases on Select FWP Wildlife Management Areas.

I am totally against opening FWP Wildlife Management Areas up to emergency grazing leases.
I would endorse emergency haying of FWP Wildlife Management Areas.
Thanks you,
Anne Wheeler

#5

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Tuesday, August 03, 2021 9:00:33 AM
Last Modified: Tuesday, August 03, 2021 9:03:31 AM
Time Spent: 00:02:58
IP Address: 47.37.8.110

Page 1

Q1

Please provide the following information:

Name: Raymond Gross
City/Town: dillon
State/Province: MT

Q2

Please comment on the Draft Environmental Assessment: Emergency Grazing and Haying Leases on Select FWP Wildlife Management Areas.

I oppose emergency leases on FWP WMAs. Manage the WMAs as per their management plans. Wildlife are impacted by the drought and fires, manage for them. Wildlife is a public resource and is to managed as a public trust.

#6

COMPLETE

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Page 1

Q1

Please provide the following information:

Name: Raymond Gross
City/Town: dillon
State/Province: MT

Q2

Please comment on the Draft Environmental Assessment: Emergency Grazing and Haying Leases on Select FWP Wildlife Management Areas.

I oppose emergency leases on FWP WMAs. Manage the WMAs as per their management plans. Wildlife are impacted by the drought and fires, manage for them. Wildlife is a public resource and is to managed as a public trust.

#7

COMPLETE

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Time Spent: 00:06:04
IP Address: 174.204.12.10

Page 1

Q1

Please provide the following information:

Name: **Scott Moon**
City/Town: **Kalispell**
State/Province: **MT**

Q2

Please comment on the Draft Environmental Assessment: Emergency Grazing and Haying Leases on Select FWP Wildlife Management Areas.

I am against this proposal. Past experience has proven that these emergency provisions have created overgrazing that is difficult to monitor and enforce. As unfortunate as these circumstances are for ranchers, allowing this grazing just puts additional strain on wildlife down the road by lack of suitable winter range. Fixing one problem while creating another is not a solution, it is an exchange. Vote no. Ranching is a business like any other business, and drought is one of those risks.

#8

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Last Modified: Tuesday, August 03, 2021 9:12:04 AM
Time Spent: 00:03:59
IP Address: 70.183.222.132

Page 1

Q1

Please provide the following information:

Name: Larry Johnson
City/Town: Baton Rouge
State/Province: LA

Q2

Please comment on the Draft Environmental Assessment: Emergency Grazing and Haying Leases on Select FWP Wildlife Management Areas.

I am in favor of establishing these leases. Perhaps a manner in which to create funds to help with this expense would be to add \$1 to out of state licenses which I usually purchase each year. The out of state people who visit and love Montana should pitch in a little and help preserve such great country. I know I am very willing to do such.

#9

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IP Address: 209.201.72.22

Page 1

Q1

Please provide the following information:

Name: Rob Harper
City/Town: Park City
State/Province: MT

Q2

Please comment on the Draft Environmental Assessment: Emergency Grazing and Haying Leases on Select FWP Wildlife Management Areas.

Every rancher I know is looking to sell off parts of their herds due to lack of feed available. Hay fields are yielding a small percentage of normal and historically productive grazing areas are inadequate. Due to the wide range of this drought it's near impossible to find reasonably priced hay as well. Anything the state can do to make hay or grazing available to them is important. It's my opinion that we should allow this activity to take place as quickly as possible.

#10

COMPLETE

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Last Modified: Tuesday, August 03, 2021 9:13:12 AM
Time Spent: 00:06:24
IP Address: 67.215.23.208

Page 1

Q1

Please provide the following information:

Name: Robert Crooks
City/Town: Cody
State/Province: WY

Q2

Please comment on the Draft Environmental Assessment: Emergency Grazing and Haying Leases on Select FWP Wildlife Management Areas.

After looking at the proposals, I object to this proposed haying/grazing leases. I'm familiar with many of these areas, and have hunted in them many times for upland birds. The proposed actions would significantly reduce recreational opportunity. Further, during times of drought, undisturbed grass habitat is at a premium. Reducing areas of undisturbed grass habitat will further reduce populations of upland birds. Especially pheasants. Over the past years I've seen a remarkable decline of habitat quality on areas like Elk Island. And a corresponding remarkable decline in pheasant numbers. Same thing on Isac Homestead. For these reasons I recommend that what little quality habitat is left on those areas be saved for the birds. In a years like this, they need it.

#11

COMPLETE

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Time Spent: 00:17:42
IP Address: 74.85.204.177

Page 1

Q1

Please provide the following information:

Name: Willis Curdy
City/Town: Missoula
State/Province: MT

Q2

Please comment on the Draft Environmental Assessment: Emergency Grazing and Haying Leases on Select FWP Wildlife Management Areas.

I support opening these areas to haying/grazing under the current drought situation. My two concerns are transporting noxious weeds to these area via livestock and/or haying equipment. Those receiving the lesses should be required to mitigate transporting noxious weeds by cleaning haying equipment prior to use on these areas. Also the cost of weed control after the lease has not been addressed.

#12

COMPLETE

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Last Modified: Tuesday, August 03, 2021 9:22:58 AM
Time Spent: 00:06:29
IP Address: 72.174.29.211

Page 1

Q1

Please provide the following information:

Name: Sara George
City/Town: Great Falls
State/Province: MT

Q2

Please comment on the Draft Environmental Assessment: Emergency Grazing and Haying Leases on Select FWP Wildlife Management Areas.

I support if those who are interested in grazing the WMA are enrolled in a type 1 block management. And the state is monitoring the condition and will pull the cows before the WMA is grazed. Down to the point where the wild life will not stay on it through the winter.

#13

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Tuesday, August 03, 2021 9:23:12 AM
Last Modified: Tuesday, August 03, 2021 9:23:35 AM
Time Spent: 00:00:23
IP Address: 72.174.29.211

Page 1

Q1

Please provide the following information:

Name: Kristopher George
City/Town: Great Falls
State/Province: MT

Q2

Please comment on the Draft Environmental Assessment: Emergency Grazing and Haying Leases on Select FWP Wildlife Management Areas.

I support if those who are interested in grazing the WMA are enrolled in a type 1 block management. And the state is monitoring the condition and will pull the cows before the WMA is grazed. Down to the point where the wild life will not stay on it through the winter.

#14

COMPLETE

Collector: Web Link 1 (Web Link)
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Last Modified: Tuesday, August 03, 2021 9:24:20 AM
Time Spent: 00:00:38
IP Address: 72.174.29.211

Page 1

Q1

Please provide the following information:

Name: Cindy George
City/Town: Great Falls
State/Province: MT

Q2

Please comment on the Draft Environmental Assessment: Emergency Grazing and Haying Leases on Select FWP Wildlife Management Areas.

I support if those who are interested in grazing the WMA are enrolled in a type 1 block management. And the state is monitoring the condition and will pull the cows before the WMA is grazed. Down to the point where the wild life will not stay on it through the winter.

#15

COMPLETE

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Last Modified: Tuesday, August 03, 2021 9:24:45 AM
Time Spent: 00:03:05
IP Address: 64.187.199.29

Page 1

Q1

Please provide the following information:

Name: Aaron Wittmer
City/Town: Havre
State/Province: MT

Q2

Please comment on the Draft Environmental Assessment: Emergency Grazing and Haying Leases on Select FWP Wildlife Management Areas.

I do not agree with additional haying operations on WMA I feel sorry for the producer but the wildlife will be directly affected by the less forage in the coming months.

#16

COMPLETE

Collector: Web Link 1 (Web Link)
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IP Address: 72.174.29.211

Page 1

Q1

Please provide the following information:

Name: Shelby George
City/Town: Great Falls
State/Province: MT

Q2

Please comment on the Draft Environmental Assessment: Emergency Grazing and Haying Leases on Select FWP Wildlife Management Areas.

I support if those who are interested in grazing the WMA are enrolled in a type 1 block management. And the state is monitoring the condition and will pull the cows before the WMA is grazed. Down to the point where the wild life will not stay on it through the winter.

#17

COMPLETE

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Time Spent: 00:13:09
IP Address: 75.143.202.120

Page 1

Q1

Please provide the following information:

Name: John lute
City/Town: Great Falls
State/Province: MT

Q2

Please comment on the Draft Environmental Assessment: Emergency Grazing and Haying Leases on Select FWP Wildlife Management Areas.

So let me get this straight. You want us to decide what is best for the wildlife that will be lost to ranchers cattle that could be sold and then replaced. Instead they want to be greedy and kill off the young wildlife that can't be replaced, the young that depends on cover to survive the predators. I thought you were the experts on wildlife. It appears not!!!
I say no to the greedy take over by teachers that can easily sell their cattle at a very high price and replace them when the drought is over. I'll repeat NO to the killing off of the young wildlife. NO to any cutting or grazing of any WMA . It's in the name... wildlife management area.... Not cattle management area .

#18

COMPLETE

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Last Modified: Tuesday, August 03, 2021 9:38:03 AM
Time Spent: 00:10:20
IP Address: 69.144.236.167

Page 1

Q1

Please provide the following information:

Name: Lynn Glock
City/Town: Red Lodge
State/Province: MT

Q2

Please comment on the Draft Environmental Assessment: Emergency Grazing and Haying Leases on Select FWP Wildlife Management Areas.

I think if these have not been hayed or grazed for awhile it will definitely benefit with new growth. Hopefully we will get rain or snow on them.

#19

COMPLETE

Collector: Web Link 1 (Web Link)
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Last Modified: Tuesday, August 03, 2021 9:38:55 AM
Time Spent: 00:05:22
IP Address: 67.204.153.160

Page 1

Q1

Please provide the following information:

Name:	Norm Ploss
City/Town:	Bend
State/Province:	OR

Q2

Please comment on the Draft Environmental Assessment: Emergency Grazing and Haying Leases on Select FWP Wildlife Management Areas.

As an upland bird hunter I have seen the results of haying & grazing in several areas. While I would prefer a different method to manage grassy area habitats, the most visible result I have seen is over grazing. The result appears more like destruction than management. I have seen such areas close to devoid of upland birds. As a minimum, the amount of time for grazing should be limited & grazing not allowed in areas of active bird hunting.

#20

COMPLETE

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Time Spent: 00:14:21
IP Address: 69.144.250.127

Page 1

Q1

Please provide the following information:

Name: **Roger Sirek**
City/Town: **Billings**
State/Province: **MT**

Q2

Please comment on the Draft Environmental Assessment: Emergency Grazing and Haying Leases on Select FWP Wildlife Management Areas.

Incredibly thorough document. I support the emergency grazing and haying on WMA. My only wish is that the entire process could be expedited 2x. Great plan and great effort to help our ranchers, thank you!

#21

COMPLETE

Collector: Web Link 1 (Web Link)
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Time Spent: 00:50:58
IP Address: 63.153.0.22

Page 1

Q1

Please provide the following information:

Name: **Drew Stuart**
City/Town: **Three Forks**
State/Province: **MT**

Q2

Please comment on the Draft Environmental Assessment: Emergency Grazing and Haying Leases on Select FWP Wildlife Management Areas.

I am generally opposed to this plan to subsidize overstocked cattlemen. No government body props up my business in times of need! WMA's are for wildlife winter range and were purchased by sportsmen (not cattlemen). Cattle grazing will bring in noxious weed seeds (I am sure these cattle will have been on subpar, weedy pasture all summer) and farm equipment will bring range fires. Come winter I want big game to be consuming our WMA forage as it was intended-not the industry(cattle) that already grazes off more than their fair share of BLM and FS forage. I am also very skeptical of this being a 'one time emergency' plan to help struggling cattlemen. Not too long ago shoulder seasons were promised to be very limited in scope and very targeted. Now shoulder seasons are all encompassing with little to no science to verify if they are having their intended effect. If this plan must be done I would be very angry if FWP was not monetarily compensated in some way-I own horses and just purchased hay for \$550/ton. Last year the same hay from the same grower cost me \$175/ton-forage is gold right now! Also any cattleman applying to graze WMA's must have their deeded land enrolled in block management. When I knock on doors for permission to shoot a couple doe whitetails 19/20 landowners shut the door in my face-people such as these have no business profiting from WMA's. Remember that you are supposed to serve wildlife and sportsmen, not cattlemen, large landowners and Greg Gianforte.

Drew Stuart

#22

COMPLETE

Collector: Web Link 1 (Web Link)
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Last Modified: Tuesday, August 03, 2021 9:52:42 AM
Time Spent: 00:15:40
IP Address: 63.153.107.116

Page 1

Q1

Please provide the following information:

Name: Ron Pierce
City/Town: Lolo
State/Province: MT

Q2

Please comment on the Draft Environmental Assessment: Emergency Grazing and Haying Leases on Select FWP Wildlife Management Areas.

I reviewed the EA. I'm in favor or working with neighboring landowners who have cooperative relationships with FWP. The grazing/haying proposal seemed balanced, given the drought situation. I'm cautiously supportive of grazing riarian areas on the Ray Kuhnz and Blacktail WMAs. This caution is based on my observation of extremely overgrazing riparian areas on other WMAs. I'm 100% sure FWP has changed riparian practices. I suggest temporary fencing if these are important stream for fisheries and/or input from the Fisheries Division. RPierce

#23

COMPLETE

Collector: Web Link 1 (Web Link)
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Last Modified: Tuesday, August 03, 2021 9:56:23 AM
Time Spent: 00:00:59
IP Address: 192.230.171.68

Page 1

Q1

Please provide the following information:

Name: Trina Jo Bradley
City/Town: Valier, Montana
State/Province: MT

Q2

Please comment on the Draft Environmental Assessment: Emergency Grazing and Haying Leases on Select FWP Wildlife Management Areas.

I think opening up the WMAs for emergency grazing and haying is a great idea. Producers need every bit of feed they can get for their livestock, and it has long been proven that livestock grazing is good for all the land and wildlife.

#24

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Tuesday, August 03, 2021 9:54:47 AM
Last Modified: Tuesday, August 03, 2021 9:57:06 AM
Time Spent: 00:02:18
IP Address: 216.14.235.127

Page 1

Q1

Please provide the following information:

Name: David Ketchell
City/Town: Plains
State/Province: MT

Q2

Please comment on the Draft Environmental Assessment: Emergency Grazing and Haying Leases on Select FWP Wildlife Management Areas.

I heartily support this emergency lease. Please implement immediately. Thank you

#25

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Tuesday, August 03, 2021 9:41:03 AM
Last Modified: Tuesday, August 03, 2021 9:59:00 AM
Time Spent: 00:17:57
IP Address: 184.166.55.205

Page 1

Q1

Please provide the following information:

Name: Dan Lee
City/Town: kalispell, MT
State/Province: MT

Q2

Please comment on the Draft Environmental Assessment: Emergency Grazing and Haying Leases on Select FWP Wildlife Management Areas.

I'm not in favor of this as I will be directly impacted in my pursuit to fill my freezer this fall with venison from the Kuhns management area. I've spent the summer scouting deer and elk there and assume that hunting conditions will be negatively affected or outright forbidden with grazing livestock running around out there.

#26

COMPLETE

Collector: Web Link 1 (Web Link)
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Last Modified: Tuesday, August 03, 2021 10:13:06 AM
Time Spent: 00:00:50
IP Address: 63.153.17.47

Page 1

Q1

Please provide the following information:

Name: Nate Howard
City/Town: Livingston
State/Province: MT

Q2

Please comment on the Draft Environmental Assessment: Emergency Grazing and Haying Leases on Select FWP Wildlife Management Areas.

No to grazing in WMA's.

#27

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Tuesday, August 03, 2021 9:20:39 AM
Last Modified: Tuesday, August 03, 2021 10:19:18 AM
Time Spent: 00:58:39
IP Address: 184.166.100.243

Page 1

Q1

Please provide the following information:

Name: Floyd L Pittard
City/Town: Helena
State/Province: MT

Q2

Please comment on the Draft Environmental Assessment: Emergency Grazing and Haying Leases on Select FWP Wildlife Management Areas.

No! First you put the cattle in there. Then you gather them which chases almost all the wildlife out of the area. If a hunter draws a Special Permit for the area, it's pure luck finding something worth taking. Result is just like the attempt to reduce cow elk numbers in certain hunting districts by letting everyone with an Elk license chase them. Why have a tag if you're going herd them out of the area and then let anyone with an elk tag hunt what's left?

#28

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Tuesday, August 03, 2021 10:27:21 AM
Last Modified: Tuesday, August 03, 2021 10:29:19 AM
Time Spent: 00:01:58
IP Address: 24.251.14.3

Page 1

Q1

Please provide the following information:

Name: Howard K. Roose
City/Town: Missoula
State/Province: MT

Q2

Please comment on the Draft Environmental Assessment: Emergency Grazing and Haying Leases on Select FWP Wildlife Management Areas.

I fully support allowing agriculture producers to graze and or hay on FWP Wildlife Management Areas and other state owned lands.

#29

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Tuesday, August 03, 2021 10:35:39 AM
Last Modified: Tuesday, August 03, 2021 10:42:04 AM
Time Spent: 00:06:25
IP Address: 107.77.201.171

Page 1

Q1

Please provide the following information:

Name: Kyle
City/Town: Great Falls
State/Province: MT

Q2

Please comment on the Draft Environmental Assessment: Emergency Grazing and Haying Leases on Select FWP Wildlife Management Areas.

Want harm are we doing to wildlife that depend on the feed quality in WMA's? As a culture we seem to take from wildlife what we want and they get the back seat to money making businesses. Those animals also need feed for the winter and we don't have an adequate area for them to have quality feed to survive the winter. We really need to evaluate this situation thoroughly before a decision is my in my opinion.

#30

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Tuesday, August 03, 2021 11:05:53 AM
Last Modified: Tuesday, August 03, 2021 11:07:21 AM
Time Spent: 00:01:28
IP Address: 192.161.70.134

Page 1

Q1

Please provide the following information:

Name: Jeff Reed
City/Town: Emigrant, MT
State/Province: MT

Q2

Please comment on the Draft Environmental Assessment: Emergency Grazing and Haying Leases on Select FWP Wildlife Management Areas.

No, grazing shouldn't be allowed on WMAs, which are set aside from wildlife, which drives an equal portion of our state's economy. I do not want my business impacted by another business. Let the markets work it out...people paying more for their food due to loss of supply due to the droughts that are in part caused by too many people.

#31

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Tuesday, August 03, 2021 11:12:00 AM
Last Modified: Tuesday, August 03, 2021 11:16:43 AM
Time Spent: 00:04:42
IP Address: 72.175.210.90

Page 1

Q1

Please provide the following information:

Name: Rich Wassall
City/Town: Dillon
State/Province: MT

Q2

Please comment on the Draft Environmental Assessment: Emergency Grazing and Haying Leases on Select FWP Wildlife Management Areas.

Both my wife and I agree that FWP would be well advised to put the needs of Montana's ranchers above any environmental concerns and quickly approve the WMA grazing and haying leases, especially during these pandemic years.

- M/M Rich Wassall

#32

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Tuesday, August 03, 2021 11:13:21 AM
Last Modified: Tuesday, August 03, 2021 11:19:25 AM
Time Spent: 00:06:04
IP Address: 184.166.73.9

Page 1

Q1

Please provide the following information:

Name: Greg Munther
City/Town: Missoula
State/Province: MT

Q2

Please comment on the Draft Environmental Assessment: Emergency Grazing and Haying Leases on Select FWP Wildlife Management Areas.

Everything is stressed in drought....including wildlife. Since most private land and BLM and State Trust lands will be hammered, the only upland bird habitat left is WMAs. And this proposal would hammer WMAs for a few cows. WMAs were purchased for wildlife, thus the name WILDLIFE management areas. No benefit for wildlife will come of this proposal. The effects of grazing/haying is that winter cover/food will be missing as well. The effects on wildlife will be long lasting. Kill this proposal ASAP.

#33

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Tuesday, August 03, 2021 11:16:25 AM
Last Modified: Tuesday, August 03, 2021 11:19:48 AM
Time Spent: 00:03:22
IP Address: 134.129.68.248

Page 1

Q1

Please provide the following information:

Name: Adrian Biewer
City/Town: Lidgerwood
State/Province: ND

Q2

Please comment on the Draft Environmental Assessment: Emergency Grazing and Haying Leases on Select FWP Wildlife Management Areas.

I think we can always help ranchers out but then I would expect access to public land to be available and not guarded by a big spread. So if I had the ranchers frame of mind, I would say land set aside for wildlife should be that. I would suspend leases on a drought year to provide for wildlife. Let them hay on a good years no problem.

#34

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Tuesday, August 03, 2021 10:28:56 AM
Last Modified: Tuesday, August 03, 2021 11:26:22 AM
Time Spent: 00:57:25
IP Address: 174.247.113.237

Page 1

Q1

Please provide the following information:

Name: Rusty Ruchert
City/Town: Townes
State/Province: MT

Q2

Please comment on the Draft Environmental Assessment: Emergency Grazing and Haying Leases on Select FWP Wildlife Management Areas.

I feel that emergency grazing on WMAs will help reduce fire danger for those areas grazed and provide relief for stock growers in the area during times of hardship.

#35

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Tuesday, August 03, 2021 10:35:16 AM
Last Modified: Tuesday, August 03, 2021 11:27:16 AM
Time Spent: 00:51:59
IP Address: 71.32.57.219

Page 1

Q1

Please provide the following information:

Name: Chris Cauble
City/Town: Helena
State/Province: MT

Q2

Please comment on the Draft Environmental Assessment: Emergency Grazing and Haying Leases on Select FWP Wildlife Management Areas.

I support Alternative A--no action. I find no justification for reducing public wildlife habitat during a severe drought in order to benefit private property owners. The proposed actions will negatively impact wildlife during a year when wildlife is already under extreme stress. In such a time, FWP should be protecting habitat, not sacrificing it, so claims that proposed actions will benefit wildlife habitat in future years are not relevant. Your proposal would establish a destructive precedent for using our public lands for private benefit whenever private property owners claim some type of hardship. You should honor your tradition of defending public wildlife and public lands.

#36

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Tuesday, August 03, 2021 11:26:10 AM
Last Modified: Tuesday, August 03, 2021 11:34:38 AM
Time Spent: 00:08:27
IP Address: 75.143.195.223

Page 1

Q1

Please provide the following information:

Name: Gordon Robinson
City/Town: Great Falls
State/Province: MT

Q2

Please comment on the Draft Environmental Assessment: Emergency Grazing and Haying Leases on Select FWP Wildlife Management Areas.

I believe in the current conditions as long as it doesn't cause any fire danger the emergency grazing and haying should be allowed. We need to support each other during this time of emergency.

#37

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Tuesday, August 03, 2021 12:07:27 PM
Last Modified: Tuesday, August 03, 2021 12:09:17 PM
Time Spent: 00:01:49
IP Address: 72.174.185.205

Page 1

Q1

Please provide the following information:

Name: Dale George
City/Town: Great Falls
State/Province: MT

Q2

Please comment on the Draft Environmental Assessment: Emergency Grazing and Haying Leases on Select FWP Wildlife Management Areas.

I WOULD NOT want to see grazing on any WMA's

#38

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Tuesday, August 03, 2021 12:56:09 PM
Last Modified: Tuesday, August 03, 2021 12:59:13 PM
Time Spent: 00:03:03
IP Address: 98.127.138.147

Page 1

Q1

Please provide the following information:

Name: Richard L Juntunen
City/Town: Clancy
State/Province: MT

Q2

Please comment on the Draft Environmental Assessment: Emergency Grazing and Haying Leases on Select FWP Wildlife Management Areas.

Ranchers should sell their excess cattle during drought conditions. Cattle grazing is one of the worst impacts on game birds and should not be conducted on WMAs. Hunters paid for these areas for hunting to avoid grazing pressure.

#39

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Tuesday, August 03, 2021 12:42:43 PM
Last Modified: Tuesday, August 03, 2021 1:02:38 PM
Time Spent: 00:19:54
IP Address: 161.7.113.180

Page 1

Q1

Please provide the following information:

Name: Charles Maddox
City/Town: Twin Bridges
State/Province: MT

Q2

Please comment on the Draft Environmental Assessment: Emergency Grazing and Haying Leases on Select FWP Wildlife Management Areas.

I support the DFWP's decision to allow temporary use of the WMA's for haying or grazing. I am located nearest to the Blacktail WMA and have spent some time working and recreating on the WMA. As noted in the EA, the bottoms are primarily smooth brome with a high incidence of canada thistle that has been treated this year with herbicide. The overall impact will be affecting around 22% of the land area of the WMA as the total area is somewhere around 18,000 acres and affected acreage is 4,100. Native species such as basin wildrye should benefit from beating down some of the old smooth brome hayfields. Basin wildrye would provide better cover for wildlife than the current smooth brome dominated meadows.

#40

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Tuesday, August 03, 2021 1:01:51 PM
Last Modified: Tuesday, August 03, 2021 1:02:45 PM
Time Spent: 00:00:53
IP Address: 174.22.7.66

Page 1

Q1

Please provide the following information:

Name: Neil Jacobson
City/Town: Lakeside
State/Province: MT

Q2

Please comment on the Draft Environmental Assessment: Emergency Grazing and Haying Leases on Select FWP Wildlife Management Areas.

Why not let wildlife graze it instead of a black god

#41

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Tuesday, August 03, 2021 1:45:53 PM
Last Modified: Tuesday, August 03, 2021 1:50:09 PM
Time Spent: 00:04:16
IP Address: 184.166.49.8

Page 1

Q1

Please provide the following information:

Name: Rick Estabrook
City/Town: BIGFORK
State/Province: MT

Q2

Please comment on the Draft Environmental Assessment: Emergency Grazing and Haying Leases on Select FWP Wildlife Management Areas.

These are our friends and neighbors. As long as it isn't detrimental to wildlife in the area, of course they should be able to utilize WMAs. Tough times sometimes require innovative solutions.

#42

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Tuesday, August 03, 2021 2:03:52 PM
Last Modified: Tuesday, August 03, 2021 2:09:34 PM
Time Spent: 00:05:42
IP Address: 63.153.17.196

Page 1

Q1

Please provide the following information:

Name: **Norman Bishop**
City/Town: **Bozeman**
State/Province: **MT**

Q2

Please comment on the Draft Environmental Assessment: Emergency Grazing and Haying Leases on Select FWP Wildlife Management Areas.

Mid-drought, I cannot imagine how haying or cattle grazing can do anything but cause soil drying and riparian damage. WILDLIFE management areas must be grazed by WILDLIFE, not tractors or cattle. I favor Alternative A, No Action. If the areas need grazing to be healthy, restore native grazers.

#43

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Tuesday, August 03, 2021 1:33:30 PM
Last Modified: Tuesday, August 03, 2021 2:26:29 PM
Time Spent: 00:52:59
IP Address: 97.121.209.216

Page 1

Q1

Please provide the following information:

Name: Stanley Cook
City/Town: Manhattan
State/Province: MT

Q2

Please comment on the Draft Environmental Assessment: Emergency Grazing and Haying Leases on Select FWP Wildlife Management Areas.

Would like to see FWP limit grazing and haying on big game wintering grounds that will now have sparse grasses for the upcoming winter, acreage set aside adjacent to plots where there was recent haying and grazing and particularly in riparian areas that are so sensitive and necessary to protect in prolonged drought.

#44

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Tuesday, August 03, 2021 2:42:52 PM
Last Modified: Tuesday, August 03, 2021 2:44:03 PM
Time Spent: 00:01:10
IP Address: 216.161.216.213

Page 1

Q1

Please provide the following information:

Name: Chris Hyle
City/Town: Butte
State/Province: MT

Q2

Please comment on the Draft Environmental Assessment: Emergency Grazing and Haying Leases on Select FWP Wildlife Management Areas.

As long as there is still enough cover for upland birds.

#45

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Tuesday, August 03, 2021 4:21:57 PM
Last Modified: Tuesday, August 03, 2021 4:37:37 PM
Time Spent: 00:15:40
IP Address: 174.204.32.248

Page 1

Q1

Please provide the following information:

Name: RONNY BOWERS
City/Town: FORT PECK
State/Province: MT

Q2

Please comment on the Draft Environmental Assessment: Emergency Grazing and Haying Leases on Select FWP Wildlife Management Areas.

I am against the mowing of the grass that is needed for food and cover for wildlife. Especially in such a dry year. There is Plenty of hay available commercially both from dry land and irrigated fields. Let common sense prevail. Lets use the Wildlife Management Areas for what they were established for. And that is not for feeding livestock.

#46

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Tuesday, August 03, 2021 5:34:01 PM
Last Modified: Tuesday, August 03, 2021 5:38:41 PM
Time Spent: 00:04:39
IP Address: 205.149.15.88

Page 1

Q1

Please provide the following information:

Name: Doug Williams
City/Town: Belgrade
State/Province: MT

Q2

Please comment on the Draft Environmental Assessment: Emergency Grazing and Haying Leases on Select FWP Wildlife Management Areas.

I support the grazing and haying leases on WMA's. Not only are ranchers in a huge bind due to lack of forage for their stock but more actively managing the WMA land would be a benefit to wildlife and hunters.

#47

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Tuesday, August 03, 2021 2:15:36 PM
Last Modified: Tuesday, August 03, 2021 6:47:35 PM
Time Spent: 04:31:59
IP Address: 97.120.161.139

Page 1

Q1

Please provide the following information:

Name: George Wuerthner
City/Town: Livingston
State/Province: MT

Q2

Please comment on the Draft Environmental Assessment: Emergency Grazing and Haying Leases on Select FWP Wildlife Management Areas.

I am opposed to the emergency livestock grazing and haying for a host of reasons.

First and foremost these areas are to be managed for wildlife, not private livestock. During a drought, wildlife is already suffering from less forage, less hiding cover, more exposure to predators, and so forth. removing vegetation to benefit livestock or ranchers will only exacerbate this issue.

As noted, in nearly every category haying and livestock have significant impacts. Spread of weeds, displacement of wildlife, impacts on recreation, impacts on water quality, and so forth. The argument that all of these are "short lived" is not accurate. Once established weeds are difficult to remove. Trampling of riparian areas and wetlands can take years for the hydrological function to return. Wildlife displaced from these areas may be driven to less favorable locations, exposing them more to predators or other issues.

Heavy equipment and cattle compacts soils which exacerbates drought by reducing water infiltration.

The idea that these leases can be canceled if problems arise is happy talk. Once on the WMA if any problems are detected, the time remaining will be so short, removal will be politically difficult to enact.

Finally the idea that ranchers should not have to pay anything for the forage and hay is absurd. Even when they pay the regular fees, it is not enough to cover all the damage that is inflicted by these operations.

The idea that grazing "enhances" forage for elk etc. is another line from the livestock industry. I suppose the elk in Yellowstone, Grand Teton, etc. are suffering because they don't have cattle to "freshen up" the forage by grazing it. These animals are perfectly able to graze without livestock assistance. Or alternatively you can do a prescribed burn which is far better because it is non selective while grazing by livestock is always selective. .

Not only should all these proposed openings be prevented, grazing and haying of existing WMA should be terminated for all the above reasons.

#48

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Tuesday, August 03, 2021 8:21:24 PM
Last Modified: Tuesday, August 03, 2021 8:33:22 PM
Time Spent: 00:11:57
IP Address: 174.204.13.97

Page 1

Q1

Please provide the following information:

Name:	S. Buchholz
City/Town:	Billings
State/Province:	MT

Q2

Please comment on the Draft Environmental Assessment: Emergency Grazing and Haying Leases on Select FWP Wildlife Management Areas.

How about asking for public hunting access from the landowners involved, since they would not have enough forage on their land for wildlife? Also as a minimum ask that forage on these wildlife mgmt. Areas be limited so that these areas are not completely without forage, especially if this winter range.

#49

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Wednesday, August 04, 2021 5:44:30 AM
Last Modified: Wednesday, August 04, 2021 6:04:16 AM
Time Spent: 00:19:46
IP Address: 174.204.8.96

Page 1

Q1

Please provide the following information:

Name: Richard Newman
City/Town: Bozeman
State/Province: MT

Q2

Please comment on the Draft Environmental Assessment: Emergency Grazing and Haying Leases on Select FWP Wildlife Management Areas.

This is a permanent emergency, called global warming. Wildlife are having a hard time too. Forest Service and BLM lands are already getting publicly owned grass for ripoff fees. FWP should break the news to ranchers that welfare ranching has its limits. Cattle herds must be reduced. The fact that you are even considering letting cows into wildlife preserves is outrageous and totally disconnected from reality. The biggest threat to ranching is not wolf predation. It is Wall Street predation. Big investor run feedlot/slaughter operations have kept cattle ranchers on the brink ever since the federal govt stopped enforcing anti-monopoly legislation from the 30s in the 80s. Raiding the last bits of public lands to bail out a vastly over-extended industry is callous, short sighted and myopic.

#50

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Wednesday, August 04, 2021 6:30:09 AM
Last Modified: Wednesday, August 04, 2021 6:33:22 AM
Time Spent: 00:03:13
IP Address: 70.33.39.164

Page 1

Q1

Please provide the following information:

Name: Michael LaCour
City/Town: Canyon Creek
State/Province: MT

Q2

Please comment on the Draft Environmental Assessment: Emergency Grazing and Haying Leases on Select FWP Wildlife Management Areas.

This is a needed and desirable action. I fully support this and encourage said action to occur sooner than later. The benefit to those in need of hay...and the tremendous positive effect on the wildlife make this a win/win. Thank you. Michael

#51

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Wednesday, August 04, 2021 6:03:41 AM
Last Modified: Wednesday, August 04, 2021 7:18:14 AM
Time Spent: 01:14:33
IP Address: 63.153.82.21

Page 1

Q1

Please provide the following information:

Name: Keith Kubista
City/Town: Stevensville MT
State/Province: MT

Q2

Please comment on the Draft Environmental Assessment: Emergency Grazing and Haying Leases on Select FWP Wildlife Management Areas.

I support the proposal for grazing/haying on WMA's based on the following reasons:
We are in an undeniable emergency situation that requires special treatments due to the current extraordinary dry conditions.
The proposal recommends equitable, science-based measures for resource utilization with mitigation for impacts if any, created by this temporary program.
As a sportsman I am very supportive of the wise use of resources that benefit wildlife and the agricultural community who often suffer losses due to wildlife impacts.
I also believe when sportsmen endorse this type of program it will produce positive relations between local ranchers and hunters.

#52

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Wednesday, August 04, 2021 7:25:31 AM
Last Modified: Wednesday, August 04, 2021 7:30:40 AM
Time Spent: 00:05:09
IP Address: 72.250.157.30

Page 1

Q1

Please provide the following information:

Name: Jay J Hanson
City/Town: Lewistown
State/Province: MT

Q2

Please comment on the Draft Environmental Assessment: Emergency Grazing and Haying Leases on Select FWP Wildlife Management Areas.

Concerns: reduced upland bird habitat, hunter conflicts, becoming an annual option or frequent occurrence, like emergency CRP grazing/haying has become.
However, due to the small tracts that this applies to, it appears to be acceptable. Ideally, it would be first offered to Block Management cooperators.
Thanks.

#53

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Wednesday, August 04, 2021 7:29:07 AM
Last Modified: Wednesday, August 04, 2021 7:32:42 AM
Time Spent: 00:03:34
IP Address: 192.161.71.254

Page 1

Q1

Please provide the following information:

Name: Kimball Leighton
City/Town: Livingston
State/Province: MT

Q2

Please comment on the Draft Environmental Assessment: Emergency Grazing and Haying Leases on Select FWP Wildlife Management Areas.

Do not emergency grazing and haying leases on FWP WMAs. Big Ag has enough handouts in Montana, and increasing grazing and allowing haying on WMAs would be at the cost of wildlife.

#54

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Wednesday, August 04, 2021 7:30:34 AM
Last Modified: Wednesday, August 04, 2021 7:37:39 AM
Time Spent: 00:07:04
IP Address: 209.95.36.151

Page 1

Q1

Please provide the following information:

Name: **Jeremy Gingerich**
City/Town: **Manhattan**
State/Province: **MT**

Q2

Please comment on the Draft Environmental Assessment: Emergency Grazing and Haying Leases on Select FWP Wildlife Management Areas.

I support Alternative B: Proposed Action. This alternative would result in proceeding with offering emergency haying and/or grazing leases on portions of selected WMAs.

The judicious and planned use of haying and grazing will provide some relief to Montana agricultural producers, and has the potential to rejuvenate decadent plants and habitats in WMA's largely left without periodic disturbance.

Haying and grazing in WMA's should not become a regular prescription, but should be retained as a management option.

Monitoring pre and post haying/grazing treatment would provide useful information for the effects of periodic haying and grazing on WMA's.

#55

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Wednesday, August 04, 2021 7:31:21 AM
Last Modified: Wednesday, August 04, 2021 7:43:17 AM
Time Spent: 00:11:55
IP Address: 76.75.35.166

Page 1

Q1

Please provide the following information:

Name: Arthur Hall
City/Town: Sheridan
State/Province: MT

Q2

Please comment on the Draft Environmental Assessment: Emergency Grazing and Haying Leases on Select FWP Wildlife Management Areas.

I am a retired Range Management Specialist. I have proposed to the US Forest Service that they relax the upland grazing use standards to 70 or even 80%, and allow pastures already grazed to be grazed again to those standards.

I suggest the FWP do the same.

Reasoning for this is: After grasses set seed they go dormant. Grazing them at this time will not hurt the plant unless the crown is grazed. 70-80% use will stop grazing before the crown is grazed. It is late enough in the season that relaxing the standards without regrazing pastures, won't help ranchers much.

Jeff Mosley of MSU agrees that grazing grass plants to 70-80% at this time of year will do no harm to the plant. I would recommend that Riparian use levels remain the same. Riparian Bank Disturbance can take years to rebuild. To protect riparian areas but allow more use of uplands, ranchers should be allowed to erect temporary electric fence.

Relaxing the standards could only be done on Non Winter Range, as this would affect wildlife wintering.

Ranchers provide much forage for wildlife throughout the year. Ranchers need the help now.

#56

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Wednesday, August 04, 2021 8:14:44 AM
Last Modified: Wednesday, August 04, 2021 8:16:29 AM
Time Spent: 00:01:44
IP Address: 174.242.232.11

Page 1

Q1

Please provide the following information:

Name: **Danny Crabtree**
City/Town: **Hilger**
State/Province: **MT**

Q2

Please comment on the Draft Environmental Assessment: Emergency Grazing and Haying Leases on Select FWP Wildlife Management Areas.

This would be an absolute God send for so many ranchers and farmers after the brutal year we have endured! Our family fully supports this.

#57

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Wednesday, August 04, 2021 8:28:55 AM
Last Modified: Wednesday, August 04, 2021 8:32:21 AM
Time Spent: 00:03:25
IP Address: 71.36.48.241

Page 1

Q1

Please provide the following information:

Name: Jerry black
City/Town: Missoula
State/Province: MT

Q2

Please comment on the Draft Environmental Assessment: Emergency Grazing and Haying Leases on Select FWP Wildlife Management Areas.

Absolutely NOT! These areas are for wildlife and not domestic livestock. Ranchers need to minimize their herds!

#58

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Wednesday, August 04, 2021 8:38:09 AM
Last Modified: Wednesday, August 04, 2021 8:40:39 AM
Time Spent: 00:02:30
IP Address: 174.204.0.215

Page 1

Q1

Please provide the following information:

Name: McCormick Jack
City/Town: Butte
State/Province: MT

Q2

Please comment on the Draft Environmental Assessment: Emergency Grazing and Haying Leases on Select FWP Wildlife Management Areas.

Irresponsible proposal. This is indicative of this administration. It's all about agriculture never about wildlife.

#59

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Wednesday, August 04, 2021 8:40:06 AM
Last Modified: Wednesday, August 04, 2021 8:43:32 AM
Time Spent: 00:03:26
IP Address: 161.7.39.7

Page 1

Q1

Please provide the following information:

Name: Heather
City/Town: Great Falls
State/Province: MT

Q2

Please comment on the Draft Environmental Assessment: Emergency Grazing and Haying Leases on Select FWP Wildlife Management Areas.

As a hunter I do not think there should be any more grazing on the WMAs, they are called Wildlife Management Areas not cattle management areas. I don't want my license dollars going to cattle efforts, their are different programs for that. I understand there is a drought but different programs handle these types of situations I don't think HUNTING license dollars should. The wildlife are also suffering from the drought and who is making sure they are well fed?

#60

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Wednesday, August 04, 2021 8:33:40 AM
Last Modified: Wednesday, August 04, 2021 8:44:34 AM
Time Spent: 00:10:53
IP Address: 161.7.93.216

Page 1

Q1

Please provide the following information:

Name: Aaron Pedersol
City/Town: Helena
State/Province: MT

Q2

Please comment on the Draft Environmental Assessment: Emergency Grazing and Haying Leases on Select FWP Wildlife Management Areas.

In order for leasees to graze or hay on FWP WMA's, enrollees must allow public hunting on equivalent acreages, either by enrolling in the BMA program or through a special access agreement administered through FWP. Loss of feed and wildlife habitat on FWP WMA's will have consequences for both wildlife and hunters by displacing game onto private properties and reducing the carrying capacity of WMAs. By trading access for feed, enrollees can help manage a potential influx of game onto their private lands while at the same time improving access and benefitting from access to supplemental feed.

#61

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Wednesday, August 04, 2021 8:30:59 AM
Last Modified: Wednesday, August 04, 2021 8:49:43 AM
Time Spent: 00:18:43
IP Address: 76.75.18.64

Page 1

Q1

Please provide the following information:

Name: **Diane Hutton**
City/Town: **Wisdom**
State/Province: **MT**

Q2

Please comment on the Draft Environmental Assessment: Emergency Grazing and Haying Leases on Select FWP Wildlife Management Areas.

I found the document very vague and lacking in any analysis. In regards to weeds I have found that many WMA are infested with leafy spurge and knapweed. Just saying your going to mitigate weeds with current monitoring isn't enough. I would encourage a more aggressive identification and spray program. I would also like to see cattle inspected before entering sites for houndstongue. I also think grazing cattle on Fleecer, which is critical winter range, in the fall prior to going into winter would hurt elk who rely on that feed. I didn't see any analysis concerning effects to winter range and elk and deer that need that feed to survive the winter. I don't think areas critical to winter range should be grazed by cattle and should be excluded from consideration. Also I couldn't tell from your map if those areas are fenced to keep cattle in those specified areas How do lease permittees plan to keep cattle in those identified areas if they are not fenced. The Blacktail area stood out as one of those. Please address how you plan on keeping cattle in those areas? Thanks for opportunity to comment. I found this EA lacking in any meaningful analysis what so ever.

#62

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Wednesday, August 04, 2021 8:52:13 AM
Last Modified: Wednesday, August 04, 2021 8:53:19 AM
Time Spent: 00:01:05
IP Address: 76.75.43.190

Page 1

Q1

Please provide the following information:

Name: **Harold Johnson**
City/Town: **Plentywood**
State/Province: **MT**

Q2

Please comment on the Draft Environmental Assessment: Emergency Grazing and Haying Leases on Select FWP Wildlife Management Areas.

Let them hay it. We need to support our Farmers and Ranchers.

#63

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Wednesday, August 04, 2021 9:09:50 AM
Last Modified: Wednesday, August 04, 2021 9:18:19 AM
Time Spent: 00:08:29
IP Address: 161.7.104.246

Page 1

Q1

Please provide the following information:

Name:	Concerned Citizen
City/Town:	Choteau
State/Province:	MT

Q2

Please comment on the Draft Environmental Assessment: Emergency Grazing and Haying Leases on Select FWP Wildlife Management Areas.

No grazing for hay should be allowed by any for profit rancher on state land. Why is state resources being used to help ranchers? They do not pay anything, they are looked at as bullies....because they complain until they get what they want. These are for profit business that should not be benefitting from state lands. It makes me sick to see this state being run for own personal gain by the republican party.

The grasshoppers are destroying my entire land. Are you going to give me money to restore it back. I have the only trees/shrubs for miles. It is habitat for so many birds and big game. If this lease is allowed, which I know it will pass no matter what the comments say, I believe the ranchers should have to reimburse those WMA sites and pay a leasing fee of \$500 per acre. A fee needs to be assessed to those folks.

#64

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Wednesday, August 04, 2021 9:20:22 AM
Last Modified: Wednesday, August 04, 2021 9:24:38 AM
Time Spent: 00:04:15
IP Address: 216.129.239.4

Page 1

Q1

Please provide the following information:

Name: Linda Owens
City/Town: McAllister
State/Province: MT

Q2

Please comment on the Draft Environmental Assessment: Emergency Grazing and Haying Leases on Select FWP Wildlife Management Areas.

I am in favor of opening up FWP Management Areas for emergency grazing. I believe it should then be followed up with assessing range health impacts from the grazing. Happy grasslands are ones that are utilized for grazing by a variety of species.

#65

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Wednesday, August 04, 2021 10:33:14 AM
Last Modified: Wednesday, August 04, 2021 10:38:22 AM
Time Spent: 00:05:08
IP Address: 206.127.75.153

Page 1

Q1

Please provide the following information:

Name: Jon Largis
City/Town: Helena
State/Province: MT

Q2

Please comment on the Draft Environmental Assessment: Emergency Grazing and Haying Leases on Select FWP Wildlife Management Areas.

Due to the extreme drought conditions that continue to affect wildlife, habitat and agricultural producers in Montana I strongly support the Emergency Grazing and Haying proclamation.

#66

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Wednesday, August 04, 2021 10:58:59 AM
Last Modified: Wednesday, August 04, 2021 11:07:12 AM
Time Spent: 00:08:12
IP Address: 192.230.170.69

Page 1

Q1

Please provide the following information:

Name: Will Dewey
City/Town: Choteau
State/Province: MT

Q2

Please comment on the Draft Environmental Assessment: Emergency Grazing and Haying Leases on Select FWP Wildlife Management Areas.

While I recognize this summer has been especially trying to hay and graze, these WMA's are also suffering from the ill effects of drought and presumably the wildlife they are supposed to protect are suffering as well. It seems that if grazing is acknowledged as a positive impact on these WMA's- why hasn't it been implemented in the management strategies to begin with? Justifying the decision to graze on the WMA's is not a decision being made to help the landscape and should not be advertised as such. Call a spade a spade. The well being of the protected State Lands is clearly of secondary concern to bottom line dollar considerations of the ranching economy. Not necessarily a bad thing but it shouldn't be hidden behind the fact that this decision is being made to the detriment of the WMA's.

#67

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Wednesday, August 04, 2021 11:28:59 AM
Last Modified: Wednesday, August 04, 2021 11:31:00 AM
Time Spent: 00:02:01
IP Address: 69.144.195.42

Page 1

Q1

Please provide the following information:

Name: Cheryl Hren
City/Town: Dillon
State/Province: MT

Q2

Please comment on the Draft Environmental Assessment: Emergency Grazing and Haying Leases on Select FWP Wildlife Management Areas.

Please allow this and it would be a good idea to continue into next year due to the fire devastation in the state.

#68

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Wednesday, August 04, 2021 11:31:57 AM
Last Modified: Wednesday, August 04, 2021 11:34:53 AM
Time Spent: 00:02:55
IP Address: 98.127.251.86

Page 1

Q1

Please provide the following information:

Name: **Felix Spinelli**
City/Town: **Bozeman**
State/Province: **MT**

Q2

Please comment on the Draft Environmental Assessment: Emergency Grazing and Haying Leases on Select FWP Wildlife Management Areas.

Please do not allow this provision to occur and destroy our valuable habitat. I am sympathetic to agricultural interests after having worked for USDA for 35 years, but do not sacrifice our wildlife habitat for many years to appease these short-run needs by these means. Look for other solutions to help out producers!!!

#69

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Wednesday, August 04, 2021 12:32:37 PM
Last Modified: Wednesday, August 04, 2021 12:34:44 PM
Time Spent: 00:02:06
IP Address: 174.247.114.215

Page 1

Q1

Please provide the following information:

Name: **Steve Wright**
City/Town: **Missoula**
State/Province: **MT**

Q2

Please comment on the Draft Environmental Assessment: Emergency Grazing and Haying Leases on Select FWP Wildlife Management Areas.

What part of ' FWP has the authority under Section 87-1-201 MCA to protect, enhance, and regulate the use of Montana's fish and wildlife resources for public benefit now and in the future.' does this support? It doesn't. In fact, it harms wildlife by misusing WMAs. Please don't.

#70

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Wednesday, August 04, 2021 11:58:25 AM
Last Modified: Wednesday, August 04, 2021 12:42:43 PM
Time Spent: 00:44:18
IP Address: 170.173.16.10

Page 1

Q1

Please provide the following information:

Name: **Joshua Valerius**
City/Town: **Missoula**
State/Province: **MT**

Q2

Please comment on the Draft Environmental Assessment: Emergency Grazing and Haying Leases on Select FWP Wildlife Management Areas.

In general, I am opposed to emergency grazing on FWP Wildlife Management Areas. The use of these lands for agricultural purposes will have profound effects on wildlife, especially grazing wildlife, that will create pressure for commonly hunted species. These species hold tremendous value to the state and will already be experiencing pressure from the drought. The Draft Environmental Statement clearly states that recreation quantity and quality will be impacted, which in and of itself is unacceptable.

The issue of weeds is mentioned in the Draft Environmental Assessment. FWP will monitor for the spread of invasive weeds on these grazing lands. If FWP is to move forward with the proposition, ranchers and industry should directly fund the monitoring process as opposed to placing the cost on hunters, anglers, or general tax payers.

Another reason I am opposed to the Draft Environmental Assessment is that it does not have a section that specifically states the impact of grazing livestock on disease transmission to wildlife. FWP should be required to discuss the impact of disease transmission to local wildlife from grazing animals before considering moving forward with the proposal.

Overall, I believe that emergency grazing and haying on public land would be detrimental to the resources we own and would be a flagrant mismanagement by the state that holds these resources in trust. The agency should seriously reconsider moving forward with this proposition.

#71

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Wednesday, August 04, 2021 1:34:50 PM
Last Modified: Wednesday, August 04, 2021 1:37:52 PM
Time Spent: 00:03:01
IP Address: 142.129.137.221

Page 1

Q1

Please provide the following information:

Name: Dr. Austin Spence
City/Town: Brea
State/Province: CA

Q2

Please comment on the Draft Environmental Assessment: Emergency Grazing and Haying Leases on Select FWP Wildlife Management Areas.

I am a PhD scientist in Ecology and Evolutionary Biology, and I am firmly against the emergency grazing initiative. This initiative will imperil many birds who need this grassland area, including the Sprague's Pipit and Baird's Sparrow. These birds are protected under the Migratory Bird Treaty Act of 1916, and it is federally illegal to destroy their habitat.

#72

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Wednesday, August 04, 2021 1:52:20 PM
Last Modified: Wednesday, August 04, 2021 1:55:00 PM
Time Spent: 00:02:39
IP Address: 207.225.4.70

Page 1

Q1

Please provide the following information:

Name: Jeff Darrah
City/Town: Stevensville
State/Province: MT

Q2

Please comment on the Draft Environmental Assessment: Emergency Grazing and Haying Leases on Select FWP Wildlife Management Areas.

I feel if the grazing is done appropriately and the haying is done responsibly, that it can benefit wildlife as well as our ranching community. So my vote is yes on this idea!!

#73

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Wednesday, August 04, 2021 2:35:15 PM
Last Modified: Wednesday, August 04, 2021 2:54:11 PM
Time Spent: 00:18:55
IP Address: 68.70.24.91

Page 1

Q1

Please provide the following information:

Name: Maggie Frazier
City/Town: Windsor
State/Province: NY

Q2

Please comment on the Draft Environmental Assessment: Emergency Grazing and Haying Leases on Select FWP Wildlife Management Areas.

Considering how long it took me to find the actual comment site (since it did not come up on the provided link) I have to assume MFWP would prefer that there were very few comments in regard to this EIS. Considering that these are FREE leases, there should be more publicity in regard to this EIS!

I did find it and post it elsewhere. I was under the impression that Fish, Wildlife & Parks were responsible for WILDLIFE - not private livestock operations. Turning cattle out in Wildlife Management Areas doesnt really strike me as a wildlife emergency - more like a private enterprise emergency - and those private enterprises should be responsible for their own products (livestock). In putting private livestock into Wildlife Management Areas in a drought situation sort of gives the impression that domestic livestock is more important to the MFWP than the wildlife they are charged to protect. Pasturing cattle in these areas not only pushes the wildlife out, but contaminates any riparian areas with e-coli from their manure, because as anyone with common sense knows, cattle will hang in or close by these riparian areas. Then there are the "haying leases" - exactly how long does MFWP expect this emergency to last? Long enough to grow, rake, & collect or bale this hay? Where will the actual native wildlife be grazing at this point when there are fields of hay being grown AND the water necessary to grow this hay? I would think these are all questions that should be asked & answered BEFORE this "assessment" is done.

#74

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Wednesday, August 04, 2021 4:13:53 PM
Last Modified: Wednesday, August 04, 2021 4:30:19 PM
Time Spent: 00:16:25
IP Address: 69.146.144.86

Page 1

Q1

Please provide the following information:

Name: **stephen Capra**
City/Town: **Missoula**
State/Province: **MT**

Q2

Please comment on the Draft Environmental Assessment: Emergency Grazing and Haying Leases on Select FWP Wildlife Management Areas.

Once again, FWP is heading in the wrong direction with a proposal. Footloose Montana strongly objects to this proposal. In a time of real drought opening wildlife areas for cattle grazing is wrong and is not science based. This is yet another gift to livestock interests, at the cost of wildlife that is also struggling. The agency must use sound science in its determinations, not jump to support special interests that already have a profound impact on predators and other keystone species in our state.

Ranching like any business involves risk. We cannot remove that risk for political purposes which is exactly what the proposal reeks of. The agency mission is for wildlife, not domestic livestock. This forage belongs to wildlife and to give it to cattle is a theft of our natural resources.

The agency has a responsibility to the citizens of this state to manage wildlife, this proposal does nothing to move that mission forward.

#75

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Wednesday, August 04, 2021 4:39:01 PM
Last Modified: Wednesday, August 04, 2021 4:44:01 PM
Time Spent: 00:04:59
IP Address: 35.133.44.60

Page 1

Q1

Please provide the following information:

Name:	Chuck Neal
City/Town:	Cody
State/Province:	WY

Q2

Please comment on the Draft Environmental Assessment: Emergency Grazing and Haying Leases on Select FWP Wildlife Management Areas.

Wildlife Management Areas must be and have to be for wildlife first and foremost. In a drought year particularly wildlife must not be forced to compete with exotic non-native ungulate for food and cover. Do not permit livestock on these WMAs under any circumstances.

#76

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Wednesday, August 04, 2021 4:51:59 PM
Last Modified: Wednesday, August 04, 2021 4:57:36 PM
Time Spent: 00:05:37
IP Address: 161.7.25.183

Page 1

Q1

Please provide the following information:

Name: Samantha Nimmick
City/Town: Havre
State/Province: MT

Q2

Please comment on the Draft Environmental Assessment: Emergency Grazing and Haying Leases on Select FWP Wildlife Management Areas.

I think this would be an excellent idea, as long as leases are only available to Montana residents.

#77

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Wednesday, August 04, 2021 6:06:32 PM
Last Modified: Wednesday, August 04, 2021 6:08:18 PM
Time Spent: 00:01:45
IP Address: 72.175.210.66

Page 1

Q1

Please provide the following information:

Name: Kim konen
City/Town: Dillon
State/Province: MT

Q2

Please comment on the Draft Environmental Assessment: Emergency Grazing and Haying Leases on Select FWP Wildlife Management Areas.

Please allow this to happen!! Ranchers need the grass to stay in business. We are the number one stewards of the land and this grazing will help with the future of these areas.

#78

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Wednesday, August 04, 2021 6:04:06 PM
Last Modified: Wednesday, August 04, 2021 6:15:20 PM
Time Spent: 00:11:13
IP Address: 63.153.31.179

Page 1

Q1

Please provide the following information:

Name: **Charlie Donnes**
City/Town: **Billings MT**
State/Province: **MT**

Q2

Please comment on the Draft Environmental Assessment: Emergency Grazing and Haying Leases on Select FWP Wildlife Management Areas.

MT F W & P's assertion that the emergency grazing and haying will be minor and temporary is STRAIGHT BULLSHIT. There is very little to graze or hay, and the wildlife and grasshoppers are taking all of that.

What are the pronghorns, deer, elk, moose and bison going to eat meanwhile? Then this winter, when/if the domestic stock is gone, what will be left?? Have you considered this??? No! You've only considered what the domestic livestock lobby has allowed you to consider: Their interest (as usual).

If, as you assert, the haying and grazing will be minor and temporary, the yield from such will be minor and temporary. Just whom do you think is fooled by your disingenuous rhetoric? If there is inadequate forage, it is inadequate for domestic stock or game.

#79

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Wednesday, August 04, 2021 9:26:40 PM
Last Modified: Wednesday, August 04, 2021 9:29:56 PM
Time Spent: 00:03:15
IP Address: 69.145.59.26

Page 1

Q1

Please provide the following information:

Name: **Jo Ann Kish**
City/Town: **Bozeman**
State/Province: **MT**

Q2

Please comment on the Draft Environmental Assessment: Emergency Grazing and Haying Leases on Select FWP Wildlife Management Areas.

You have to be crazy to even consider allowing haying and grazing on WMA's. I realize ranchers are in a huge bind this year. But so is wildlife and the WMA's are all they have to get through a forecasted "normal" winter. Whomever proposed this B.S. should be tarred and feathered and ran out of the state.

#80

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Wednesday, August 04, 2021 9:22:34 PM
Last Modified: Wednesday, August 04, 2021 9:34:52 PM
Time Spent: 00:12:18
IP Address: 65.219.130.12

Page 1

Q1

Please provide the following information:

Name: Michaiah Smith
City/Town: Livingston
State/Province: MT

Q2

Please comment on the Draft Environmental Assessment: Emergency Grazing and Haying Leases on Select FWP Wildlife Management Areas.

Forget the environmental assessment and just open it up! There are people losing their farms and businesses because of all the red tape! Graze it, and hay it, or it will just burn up like the rest of Montana and the western states and then the rest of us will starve because there's no food for our food to eat! There's lots of grass out there on public lands that is just going to waste and polluting the air and atmosphere when (not if) it burns. OPEN IT UP! ALL OF IT!

#81

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Thursday, August 05, 2021 6:31:36 AM
Last Modified: Thursday, August 05, 2021 6:43:54 AM
Time Spent: 00:12:17
IP Address: 72.255.179.130

Page 1

Q1

Please provide the following information:

Name: Scott Hughes
City/Town: Stanford
State/Province: MT

Q2

Please comment on the Draft Environmental Assessment: Emergency Grazing and Haying Leases on Select FWP Wildlife Management Areas.

All WMAs should be open to emergency grazing immediately until October. The fuel load on some of these WMAs is significant. There are a few cows on some WMAs, but FWP should take animals in from operations that feed a large number of public's wildlife on private ground. So much more can be done by FWP to reduce wildlife populations. I hope the department is taking addition steps to reduce pressure on private lands. Respectfully, Scott

#82

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Thursday, August 05, 2021 7:03:40 AM
Last Modified: Thursday, August 05, 2021 7:09:15 AM
Time Spent: 00:05:34
IP Address: 174.45.254.203

Page 1

Q1

Please provide the following information:

Name: Andrew Guttenberg
City/Town: Bozeman
State/Province: MT

Q2

Please comment on the Draft Environmental Assessment: Emergency Grazing and Haying Leases on Select FWP Wildlife Management Areas.

It seems non-game wildlife is not a consideration in this proposal. Grazing/haying might help pheasants and white-tailed deer, but it harms almost all native bird species. Especially in wetlands, riparian areas and native grassland, the impact of cows should be kept to a minimum. I understand the drought severity, and cows do need to eat, but if this proposal moves forward, it should be only in existing agricultural sections of these WMAs, not native habitat.

#83

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Thursday, August 05, 2021 7:40:37 AM
Last Modified: Thursday, August 05, 2021 7:49:08 AM
Time Spent: 00:08:31
IP Address: 71.37.189.201

Page 1

Q1

Please provide the following information:

Name: Ronald T Biglen
City/Town: LEWISTOWN
State/Province: MT

Q2

Please comment on the Draft Environmental Assessment: Emergency Grazing and Haying Leases on Select FWP Wildlife Management Areas.

I am voting YES to allow FWP Emergency Grazing on select Wildlife Management Areas. I am hold my nose to do so.

#84

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Thursday, August 05, 2021 8:47:04 AM
Last Modified: Thursday, August 05, 2021 8:52:02 AM
Time Spent: 00:04:58
IP Address: 192.161.71.177

Page 1

Q1

Please provide the following information:

Name: Daryl L Shehan
City/Town: Clyde Park
State/Province: MT

Q2

Please comment on the Draft Environmental Assessment: Emergency Grazing and Haying Leases on Select FWP Wildlife Management Areas.

I believe it would be a good practice to allow grazing and haying state lands during these drought conditions. For one it will probably improve the the habitat in those areas in the years to come and also help farmers and ranches maybe survive these times. The more ag producers there are the better for wildlife.

#85

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Thursday, August 05, 2021 10:24:58 AM
Last Modified: Thursday, August 05, 2021 10:36:29 AM
Time Spent: 00:11:31
IP Address: 216.161.218.240

Page 1

Q1

Please provide the following information:

Name: Jim Lewis
City/Town: Frenchtown
State/Province: MT

Q2

Please comment on the Draft Environmental Assessment: Emergency Grazing and Haying Leases on Select FWP Wildlife Management Areas.

Thank you for the opportunity to comment. I fully support the proposal, and would ask that you also consider including other FWP lands such as fishing access sites. For example, Erskine, Council Grove, and other access sites across the state could offer some high quality grazing to assist ranchers in this drought emergency, with similar impacts to the natural and human environment. Assisting ranchers AS MUCH AS POSSIBLE in these tough times will hopefully help them to be able to maintain their ranches, which are known to have immeasurable benefits to wildlife and their habitats, particularly compared to the alternative of subdivision and development.
Thank you for your consideration.

#86

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Thursday, August 05, 2021 11:02:04 AM
Last Modified: Thursday, August 05, 2021 11:09:56 AM
Time Spent: 00:07:52
IP Address: 108.174.114.110

Page 1

Q1

Please provide the following information:

Name: Clair Cabal
City/Town: Stevensville
State/Province: MT

Q2

Please comment on the Draft Environmental Assessment: Emergency Grazing and Haying Leases on Select FWP Wildlife Management Areas.

You are ignoring the high physical stress our wildlife is under in this drought. Sorry for our ranchers - but this is a fiscal issue for them. For our wildlife it's life or death. This is political, this is wrong. Please put our wild lands and wildlife first. I was raised in ranching country but I am sick of subsidizing ranchers and cattle at the expense of taxpayers, wildlife, wild land health and rivers.
Considerations:

Livestock grazing and haying operations will add additional stress to already stressed wildlife populations.

WMAs are set aside to support wildlife and wildlife habitat and should not be given away to livestock producers.

Despite claims in the environmental assessment that haying and grazing will increase forage and cover for wildlife following the proposed operations, there is no scientific evidence to support this and we all know it's crap you put in there to push this through.

With reduced production of plants due to drought, any further reduction from livestock use will result in adverse impacts to wildlife that rely on the WMAs.

#87

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Thursday, August 05, 2021 2:59:56 PM
Last Modified: Thursday, August 05, 2021 3:02:13 PM
Time Spent: 00:02:16
IP Address: 174.247.116.118

Page 1

Q1

Please provide the following information:

Name: Mary Hone
City/Town: Nephi
State/Province: UT

Q2

Please comment on the Draft Environmental Assessment: Emergency Grazing and Haying Leases on Select FWP Wildlife Management Areas.

This is ridiculous. I have spent a lot of time in Montana, and have always enjoyed the wildlife there. But now, the wildlife is getting thrown under the bus. And for what? Livestock?! Really? If they want to grow cows, they can go get their own land and stay off our public land. The wildlife is far more important.

#88

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Thursday, August 05, 2021 3:14:00 PM
Last Modified: Thursday, August 05, 2021 3:20:23 PM
Time Spent: 00:06:23
IP Address: 73.4.182.34

Page 1

Q1

Please provide the following information:

Name: Kimberly Tilley
City/Town: Walpole
State/Province: NH

Q2

Please comment on the Draft Environmental Assessment: Emergency Grazing and Haying Leases on Select FWP Wildlife Management Areas.

Leave wild places to the wildlife. Stop allowing cows to destroy and pollute. People are not going without food because there isn't enough, people are going hungry because other people are keeping good from them. More foods get to the landfills than humans can consume. People are giving up eating animals, it's time to embrace this and stop breeding cows. 80% off the wild vegetation is eaten by the cows and not the wild equines. You are suppose to be an agency to protect the wildlife, start doing that and say no to cattle, no to oil, no to developers. Earth is dieing and you need to help protect her. Do better for the survival of wildlife. Do better so there can be clean water, air, landscape. Do better so there will be less wildfires. Do good for wildlife.

#89

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Thursday, August 05, 2021 6:17:45 PM
Last Modified: Thursday, August 05, 2021 6:18:27 PM
Time Spent: 00:00:42
IP Address: 184.90.59.255

Page 1

Q1

Please provide the following information:

Name: **Sherri Williams**
City/Town: **HOLLY HILL**
State/Province: **FL**

Q2

Please comment on the Draft Environmental Assessment: Emergency Grazing and Haying Leases on Select FWP Wildlife Management Areas.

Livestock grazing and haying operations will add additional stress to already stressed wildlife populations.

WMAs are set aside to support wildlife and wildlife habitat and should not be given away to livestock producers.

Despite claims in the environmental assessment that haying and grazing will increase forage and cover for wildlife following the proposed operations, there is no scientific evidence to support this.

With reduced production of plants due to drought, any further reduction from livestock use will result in adverse impacts to wildlife that rely on the WMAs.

#90

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Thursday, August 05, 2021 6:36:24 PM
Last Modified: Thursday, August 05, 2021 6:47:35 PM
Time Spent: 00:11:11
IP Address: 68.184.157.201

Page 1

Q1

Please provide the following information:

Name: Valerie Miller
City/Town: McDonough
State/Province: GA

Q2

Please comment on the Draft Environmental Assessment: Emergency Grazing and Haying Leases on Select FWP Wildlife Management Areas.

Livestock grazing is a blight on public lands. Enough with the over population of cattle on our public lands and abuse of taxpayers money all for the billionaire and millionaire welfare ranchers. #BLMNational & USDA wildlife services are exterminating wild horses and trapping wildlife all for the big beef & big Ag. industries. No to cattle of wildlife refuges. This is unacceptable.

#91

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Thursday, August 05, 2021 6:45:19 PM
Last Modified: Thursday, August 05, 2021 6:53:25 PM
Time Spent: 00:08:05
IP Address: 69.149.152.202

Page 1

Q1

Please provide the following information:

Name: Carol E Jones
City/Town: Tooeka
State/Province: KS

Q2

Please comment on the Draft Environmental Assessment: Emergency Grazing and Haying Leases on Select FWP Wildlife Management Areas.

The wildlife needs to take priority over the grazing and haying leases on FWP wildlife Management Areas. That's the problem with all Management Areas regardless of it being wildlife or wild horses and burro management areas. Take the ranchers off and let the animals have what is due them.

#92

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Thursday, August 05, 2021 8:16:42 PM
Last Modified: Thursday, August 05, 2021 8:20:04 PM
Time Spent: 00:03:21
IP Address: 174.204.28.125

Page 1

Q1

Please provide the following information:

Name:	Brian Fladstol
City/Town:	Conrad
State/Province:	MT

Q2

Please comment on the Draft Environmental Assessment: Emergency Grazing and Haying Leases on Select FWP Wildlife Management Areas.

This process should have taken place months ago if it was to be allowed to happen. It is too late now considering a couple of factors. 1. The footage on these sites will be too old and too low in animal digestible value to be worth anything. 2. It is far too dry and hot to allow machinery in to hay it or fence areas off for grazing. This should not be allowed and FWP should reevaluate their decision making process to be able to help in a timely manner.

#93

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Tuesday, August 03, 2021 2:02:23 PM
Last Modified: Friday, August 06, 2021 8:28:23 AM
Time Spent: Over a day
IP Address: 69.144.71.14

Page 1

Q1

Please provide the following information:

Name: Raylee Honeycutt
City/Town: Helena
State/Province: MT

Q2

Please comment on the Draft Environmental Assessment: Emergency Grazing and Haying Leases on Select FWP Wildlife Management Areas.

Montana Fish, Wildlife and Parks
c/o Rick Northrup
Box 200701
Helena, MT 59620-0701

Re: Emergency Grazing and Haying Leases on Select FWP Wildlife Management Areas

Dear Mr. Northrup:

On behalf of the Montana Stockgrowers Association (MSGA), the Montana Public Lands Council (MPLC), and the Montana Association of State Grazing Districts (MASGD), we thank the Montana Department of Fish, Wildlife and Parks (FWP) for assisting in finding solutions to address the current drought emergency in Montana and provide options to Montana ranching families during this challenging time.

Our organizations fully support the proposed action recommended in the draft Environmental Assessment, to open Wildlife Management Areas for one or more emergency haying or grazing leases. During this historic drought, where ranching families are experiencing substantial effects from drought, additional grazing and haying opportunities are needed throughout the state. In addition to the immediate need for forage for livestock, livestock grazing can additionally provide positive benefits to wildlife habitat.

MSGA, MPLC, and MASGD appreciates FWP for its continued work to look for proactive solutions to assist. Opening up grazing and haying on Wildlife Management Areas is a win for ranchers, wildlife habitat, and the range.

Sincerely,

Raylee A. Honeycutt
Director of Natural Resources | Montana Stockgrowers Association
Executive Staff | Montana Public Lands Council
Executive Staff | Montana Association of State Grazing Districts

#94

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Friday, August 06, 2021 8:49:26 AM
Last Modified: Friday, August 06, 2021 9:12:47 AM
Time Spent: 00:23:20
IP Address: 184.166.98.129

Page 1

Q1

Please provide the following information:

Name: **John B. Sullivan III**
City/Town: **Missoula**
State/Province: **MT**

Q2

Please comment on the Draft Environmental Assessment: Emergency Grazing and Haying Leases on Select FWP Wildlife Management Areas.

I am submitting the following on behalf of the Montana Chapter of Backcountry Hunters & Anglers in regards to FWP's proposal to implement emergency grazing and haying on portions of 14 Wildlife Management Areas (WMAs).

We have great sympathy for our ranching neighbors and communities who are suffering from this drought. We also firmly agree with FWP that WMAs should be managed with wildlife and wildlife habitat conservation as the priority. In the face of these hard times we respectfully ask that this emergency order include the following:

- 1) Implementation that universally improves winter feed for publicly owned wildlife, while taking into consideration the needs of other wildlife including upland game and ground-nesting birds who rely on plant growth for cover.
- 2) Grazing and haying priority be given to our neighbors who are currently enrolled in FWP's Block Management Program. Some 1,200 landowners are enrolled in Block Management and have generously opened their private lands for public hunting access; many of them could surely use the extra help, and if we're opening hunter-funded public wildlife management areas for private use, we would like to reciprocate their goodwill first and foremost.

Thank you for your consideration.

Regards,

John B. Sullivan III
Chairman
Montana Chapter Backcountry Hunters & Anglers
Cell: 406-360-4086
montana@backcountryhunters.org

#95

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Friday, August 06, 2021 10:13:19 AM
Last Modified: Friday, August 06, 2021 10:15:42 AM
Time Spent: 00:02:23
IP Address: 161.7.39.7

Page 1

Q1

Please provide the following information:

Name: Chris
City/Town: Cascade
State/Province: MT

Q2

Please comment on the Draft Environmental Assessment: Emergency Grazing and Haying Leases on Select FWP Wildlife Management Areas.

I am 100% against this project. State lands should not be used to help for profit business'. Ranchers should have to take care of their own property. I be non of them practice any type of forest/land management for fires.

#96

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Friday, August 06, 2021 10:17:21 AM
Last Modified: Friday, August 06, 2021 10:18:43 AM
Time Spent: 00:01:22
IP Address: 161.7.39.7

Page 1

Q1

Please provide the following information:

Name: Bill Hayes
City/Town: Helena
State/Province: MT

Q2

Please comment on the Draft Environmental Assessment: Emergency Grazing and Haying Leases on Select FWP Wildlife Management Areas.

I do not support any part of this project. I hope it does be allowed to happen. Everyone is affected by fire and not everyone can steal from the state to take care of cattle that they will be selling for PROFIT!!

#97

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Friday, August 06, 2021 10:19:47 AM
Last Modified: Friday, August 06, 2021 10:25:58 AM
Time Spent: 00:06:11
IP Address: 72.174.136.246

Page 1

Q1

Please provide the following information:

Name: Ellen Pero
City/Town: Missoula
State/Province: MT

Q2

Please comment on the Draft Environmental Assessment: Emergency Grazing and Haying Leases on Select FWP Wildlife Management Areas.

I am completing my PhD in wildlife management at the University of Montana on elk. I am writing to express that I do NOT support FWP's emergency grazing proposal on ~8500 acres of habitat managed expressly for wildlife. While ranchers and livestock are no doubt feeling the effects of climate change induced heat, drought, and wildfire - we must find solutions to mitigating climate change effects that does not threaten to further disrupt wildlife populations that themselves are being threatened by these same climate effects. We look to FWP to be a science-based organization responsibility for safe-guarding and promoting healthy wildlife populations in perpetuity. This proposal is not in line with that responsibility and related objectives.

#98

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Friday, August 06, 2021 10:28:56 AM
Last Modified: Friday, August 06, 2021 10:32:17 AM
Time Spent: 00:03:20
IP Address: 161.7.39.7

Page 1

Q1

Please provide the following information:

Name: Nancy P
City/Town: Bozeman
State/Province: MT

Q2

Please comment on the Draft Environmental Assessment: Emergency Grazing and Haying Leases on Select FWP Wildlife Management Areas.

I am against allowing this project to happen. This current Gov is only worried about votes and ranchers are powerful groups. This is NOT in the best interest of Montana folks.

#99

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Friday, August 06, 2021 10:32:34 AM
Last Modified: Friday, August 06, 2021 10:33:26 AM
Time Spent: 00:00:51
IP Address: 161.7.39.7

Page 1

Q1

Please provide the following information:

Name: Marty F
City/Town: Craig
State/Province: MT

Q2

Please comment on the Draft Environmental Assessment: Emergency Grazing and Haying Leases on Select FWP Wildlife Management Areas.

I am against this project. I hope that it is not allowed!!

#100

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Friday, August 06, 2021 10:46:24 AM
Last Modified: Friday, August 06, 2021 11:13:22 AM
Time Spent: 00:26:58
IP Address: 76.113.47.68

Page 1

Q1

Please provide the following information:

Name: Magnolia Riley
City/Town: Las Cruces
State/Province: NM

Q2

Please comment on the Draft Environmental Assessment: Emergency Grazing and Haying Leases on Select FWP Wildlife Management Areas.

I am not going to sit here and be all passive about this, enough is enough. Montana has one of the best natural wildlife areas in the country and you guys don't even value it. Now, you want to bulldoze the land for farming, isn't that rich? Are you satisfied, yet? You want to know why you're in a drought? It's the same reason why New Mexico is... we live in the western part of the country, rainfall is scarce once you move past a certain region, I should know this because I'm from the eastern part of the country where it rains abundantly. You want to blame on wolves? Blame it on yourself and your love of eating meat, if you did your research you wouldn't be bringing up this proposal like you are right now. Livestock agriculture is the one of the worst ways to combat climate change and yet here we are. Seriously, I don't think this is going to help with your drought issue, it will only intensify it. But, what do I know, right? I'm not a member of Congress or anything, so my voice isn't considered up to your standards... the whole world is facing natural disasters, but now it's only Montana that matters to you, right? Give me a break. We are all suffering and it's because people don't give a lick about changing their behavior to notice how utterly and truly the environment is degrading at more rapid speeds than ever before because of human interaction. So, in retrospect, you can either listen to what I'm saying and do something about this by not following through with it or do whatever you please with your ego as your main concern and gasp for air along the way in the many years to come.

#101

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Friday, August 06, 2021 12:13:32 PM
Last Modified: Friday, August 06, 2021 12:18:20 PM
Time Spent: 00:04:48
IP Address: 172.58.44.179

Page 1

Q1

Please provide the following information:

Name: Robert Donat
City/Town: Whitehall
State/Province: MT

Q2

Please comment on the Draft Environmental Assessment: Emergency Grazing and Haying Leases on Select FWP Wildlife Management Areas.

Do not let the cattle barons destroy our wildlife refuges. They already have over grazed the blm and forest service for 20 years. Montana used to have 3 million cattle now its 5.5 million. They are destroying our environment this drought Is nature fighting back Let it happen

#102

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Friday, August 06, 2021 12:34:03 PM
Last Modified: Friday, August 06, 2021 12:36:04 PM
Time Spent: 00:02:00
IP Address: 70.172.123.107

Page 1

Q1

Please provide the following information:

Name: Claudia Bloom
City/Town: Mesa
State/Province: AZ

Q2

Please comment on the Draft Environmental Assessment: Emergency Grazing and Haying Leases on Select FWP Wildlife Management Areas.

The welfare ranchers need to sell their cows. We are tired of our public lands being ruined by a few "ranchers" who live on the dole and have everything killed in the process. No cows in Wildlife Management Areas.

#103

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Friday, August 06, 2021 1:43:52 PM
Last Modified: Friday, August 06, 2021 2:11:00 PM
Time Spent: 00:27:07
IP Address: 76.75.35.91

Page 1

Q1

Please provide the following information:

Name: **John C Anderson**
City/Town: **Alder**
State/Province: **MT**

Q2

Please comment on the Draft Environmental Assessment: Emergency Grazing and Haying Leases on Select FWP Wildlife Management Areas.

I think it is quite appropriate for FWP to make forage available to neighbors of their Wildlife Management Areas. In this time of severe drought any available forage is critical to livestock producers sustaining our herds. It would be my suggestion that Grazers in close proximity to the WMAs be given priority use of those areas.

#104

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Friday, August 06, 2021 4:38:00 PM
Last Modified: Friday, August 06, 2021 4:39:18 PM
Time Spent: 00:01:18
IP Address: 162.244.234.219

Page 1

Q1

Please provide the following information:

Name: Steve Schindler
City/Town: Glasgow
State/Province: MT

Q2

Please comment on the Draft Environmental Assessment: Emergency Grazing and Haying Leases on Select FWP Wildlife Management Areas.

I oppose any cattle grazing in wildlife management area's,

#105

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Friday, August 06, 2021 4:17:56 PM
Last Modified: Friday, August 06, 2021 4:41:28 PM
Time Spent: 00:23:31
IP Address: 76.75.24.219

Page 1

Q1

Please provide the following information:

Name: William Arnold
City/Town: Fishtail
State/Province: MT

Q2

Please comment on the Draft Environmental Assessment: Emergency Grazing and Haying Leases on Select FWP Wildlife Management Areas.

Yes, by all means, help the ranchers keep their livelihood possible. Of course wildlife is valuable too, but they need to share! Thanks.

#106

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Friday, August 06, 2021 5:37:23 PM
Last Modified: Friday, August 06, 2021 5:39:07 PM
Time Spent: 00:01:43
IP Address: 216.166.172.205

Page 1

Q1

Please provide the following information:

Name: Jesse LeMay
City/Town: Manhattan
State/Province: MT

Q2

Please comment on the Draft Environmental Assessment: Emergency Grazing and Haying Leases on Select FWP Wildlife Management Areas.

I do not approve of this. The wildlife are already having to compete for food. Enough is enough. These large ranches have pristine grass. Let the cows come home and eat at home and leave my elk and deer habitat alone.

#107

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Friday, August 06, 2021 7:17:52 PM
Last Modified: Friday, August 06, 2021 7:20:33 PM
Time Spent: 00:02:41
IP Address: 73.22.23.192

Page 1

Q1

Please provide the following information:

Name: **Connie Burris**
City/Town: **Springfield**
State/Province: **IL**

Q2

Please comment on the Draft Environmental Assessment: Emergency Grazing and Haying Leases on Select FWP Wildlife Management Areas.

No more cattle grazing or haying leases on any wild areas
No more displacing and killing wildlife for these ranchers

#108

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Friday, August 06, 2021 8:13:11 PM
Last Modified: Friday, August 06, 2021 8:19:44 PM
Time Spent: 00:06:32
IP Address: 72.255.141.68

Page 1

Q1

Please provide the following information:

Name: Michael Ley
City/Town: Havre
State/Province: MT

Q2

Please comment on the Draft Environmental Assessment: Emergency Grazing and Haying Leases on Select FWP Wildlife Management Areas.

There should be no grazing or haying on the wildlife areas. These areas were set aside for wildlife and hunting opportunities. There is very little public land left in the Havre area and many other locations. Grazing of cattle destroys bird habitat

#109

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Friday, August 06, 2021 8:38:45 PM
Last Modified: Friday, August 06, 2021 8:41:46 PM
Time Spent: 00:03:01
IP Address: 69.145.61.215

Page 1

Q1

Please provide the following information:

Name: Harvey Paugh
City/Town: Bozeman
State/Province: MT

Q2

Please comment on the Draft Environmental Assessment: Emergency Grazing and Haying Leases on Select FWP Wildlife Management Areas.

I would like to point out up front that I voted for Gov Gianforte and am also pro farm and ranch. This appears to be another step in the Gianforte's and the new FWP director to turn wildlife management over to the ranchers and outfitters. Most of the public land is already overgrazed. These wildlife management areas were set aside mostly with sportsmens dollars for wildlife in tough times. If they are grazed off also then this winter the game will have one more reason to camp out on these private lands. Then the landowners will once again ask the new commission who is already in the back pocket of the farmers and ranchers to kill more elk and deer. Everyone seems to forget that much of this private land was and is traditional winter range for wildlife. Let the landowners do their own work and find hay or grazing or maybe sell off some critters. I have never spoken against grazing FS or state lands before and I am not against it but this proposal is not needed and enough is enough. leave some forage for the wild critters.

#110

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Friday, August 06, 2021 3:50:04 PM
Last Modified: Friday, August 06, 2021 9:04:18 PM
Time Spent: 05:14:13
IP Address: 205.233.46.104

Page 1

Q1

Please provide the following information:

Name: Brian McCarty
City/Town: Harrison
State/Province: MT

Q2

Please comment on the Draft Environmental Assessment: Emergency Grazing and Haying Leases on Select FWP Wildlife Management Areas.

I think it's a great idea that should be implemented immediately and done more often even in non drought years.

#111

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Saturday, August 07, 2021 8:21:52 AM
Last Modified: Saturday, August 07, 2021 8:48:29 AM
Time Spent: 00:26:36
IP Address: 63.153.83.223

Page 1

Q1

Please provide the following information:

Name: Rick Simpson
City/Town: Helena
State/Province: MT

Q2

Please comment on the Draft Environmental Assessment: Emergency Grazing and Haying Leases on Select FWP Wildlife Management Areas.

wildlife management areas should be just that, although grazing/over grazing has mostly been allowed anyway. they should not be welfare management areas.

#112

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Saturday, August 07, 2021 9:06:51 AM
Last Modified: Saturday, August 07, 2021 9:51:59 AM
Time Spent: 00:45:07
IP Address: 72.250.133.199

Page 1

Q1

Please provide the following information:

Name:	Terry Kombol
City/Town:	Roundup
State/Province:	MT

Q2

Please comment on the Draft Environmental Assessment: Emergency Grazing and Haying Leases on Select FWP Wildlife Management Areas.

YES, it needs to be done. However, you are not including two very important refuge pieces that NEED to be grazed. The Lake Mason and Lake Mason North refuge units. These have not been grazed in over 10 years. These areas have been studied and the Lake Mason Unit deemed not a healthy eco system anymore due to non grazing, it has no healthy bugs anymore, sage grouse chicks can not get to water sources, etc. We are permit holders of the Lake Mason North Unit since approx 1950, we have not been allowed to graze over 10 years, there are 8 sections of grass. The elk will need to water at our tanks this year to survive, their water sources are drying up. Please take a look at these two units, we are ranchers in desperate need of pasture. Our family homesteaded here in 1909 and we are planning on the 5th generation to be here someday. We have participated in the block management program for going on 20 years now and believe in public hunting. We are neighbors to the Wilkes Ranches bordering us on 2-3 sides which harbors over 9,000 head of elk, 800% over population goals. Thank you for the ability to comment

#113

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Saturday, August 07, 2021 11:44:14 AM
Last Modified: Saturday, August 07, 2021 11:52:53 AM
Time Spent: 00:08:39
IP Address: 24.72.196.147

Page 1

Q1

Please provide the following information:

Name: **David Noell**
City/Town: **Laurel**
State/Province: **MT**

Q2

Please comment on the Draft Environmental Assessment: Emergency Grazing and Haying Leases on Select FWP Wildlife Management Areas.

I urge the FWP to proceed with alternative A. These lands were paid for with sportsmen's dollars. When there is an extreme drought, wildlife is up against it as much as farming and ranching. The overwhelming priority for these lands should be for wildlife, not as a safety net for agriculture.

#114

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Saturday, August 07, 2021 1:21:50 PM
Last Modified: Saturday, August 07, 2021 1:25:27 PM
Time Spent: 00:03:37
IP Address: 174.45.65.187

Page 1

Q1

Please provide the following information:

Name: Mark Haroldson
City/Town: MANHATTAN
State/Province: MT

Q2

Please comment on the Draft Environmental Assessment: Emergency Grazing and Haying Leases on Select FWP Wildlife Management Areas.

I support Alternative A: No Action. Wildlife is also being impacted by the heat and drought. Alternative B would add to those impacts to wildlife on the WMAs.

#115

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Saturday, August 07, 2021 1:31:04 PM
Last Modified: Saturday, August 07, 2021 1:37:40 PM
Time Spent: 00:06:36
IP Address: 65.131.192.26

Page 1

Q1

Please provide the following information:

Name: Dee Pier
City/Town: Columbia Falls
State/Province: MT

Q2

Please comment on the Draft Environmental Assessment: Emergency Grazing and Haying Leases on Select FWP Wildlife Management Areas.

I would like to go on record as supporting this proposal for FWP To assist the MT ag community.. It seems an ideal situation for the State of MT to assist our beleaguered ag producers in this emergency situation. Itis a good opportunity for the State/Private sector to work together, to both improve wildlife habitat, and assist our neighbors who are struggling.to survive this drought.

Dee Pier,
Columbia Falls

#116

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Saturday, August 07, 2021 1:32:19 PM
Last Modified: Saturday, August 07, 2021 1:44:03 PM
Time Spent: 00:11:43
IP Address: 68.70.24.91

Page 1

Q1

Please provide the following information:

Name: Maggie Frazier
City/Town: Windsor
State/Province: NY

Q2

Please comment on the Draft Environmental Assessment: Emergency Grazing and Haying Leases on Select FWP Wildlife Management Areas.

In a drought situation the idea of adding domestic livestock & hay production to a Wildlife Management Area would certainly seem to be counter productive. Not sure exactly where the "emergency" issue aligns with wildlife already suffering from a drought. Certainly the wildlife and its habitat are already in an emergency situation - Putting domestic livestock into this Area would seem to me to be much more damaging to the wildlife & its habitat. If indeed these livestock operations are in an emergency situation, perhaps they need to lower the numbers of their animals - not put these domestic animals into a Wildlife Management Area where the habitat is already compromised. To add producing hay fields in this area where quantities of forage are already questionable is, quite frankly, idiotic.

#117

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Saturday, August 07, 2021 1:56:52 PM
Last Modified: Saturday, August 07, 2021 2:10:10 PM
Time Spent: 00:13:17
IP Address: 98.202.12.155

Page 1

Q1

Please provide the following information:

Name: Mick Sutliff
City/Town: Salt Lake City
State/Province: UT

Q2

Please comment on the Draft Environmental Assessment: Emergency Grazing and Haying Leases on Select FWP Wildlife Management Areas.

Please don't. Displacing wildlife for the needs of livestock seems to be the exact opposite of what MFWP is supposed to do when managing wildlife and its habitat. And to do so at no cost to the ranchers directly benefiting from this proposal is idiotic. [REDACTED]
[REDACTED] MFWP needs to grow a spine. Tell those ranchers to manage their herds and their own resources better.

#118

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Saturday, August 07, 2021 2:47:42 PM
Last Modified: Saturday, August 07, 2021 2:57:59 PM
Time Spent: 00:10:16
IP Address: 72.250.140.158

Page 1

Q1

Please provide the following information:

Name: Mark and Deanna Robbins
City/Town: Roy
State/Province: MT

Q2

Please comment on the Draft Environmental Assessment: Emergency Grazing and Haying Leases on Select FWP Wildlife Management Areas.

We absolutely support this proposal. We don't appear to be in an area that would directly benefit, but support the benefit to those who are. It would be irresponsible for FWP to withhold grazing and haying where available on WMA's, when ranchers are facing grass and hay shortages yet still hosting wildlife. We appreciate the forward thinking of this proposal, and the spirit of working together in challenging times.

#119

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Saturday, August 07, 2021 3:51:47 PM
Last Modified: Saturday, August 07, 2021 3:52:30 PM
Time Spent: 00:00:43
IP Address: 69.236.104.29

Page 1

Q1

Please provide the following information:

Name: Jillian
City/Town: Rancho Murieta
State/Province: CA

Q2

Please comment on the Draft Environmental Assessment: Emergency Grazing and Haying Leases on Select FWP Wildlife Management Areas.

WMAs are set aside to support wildlife and wildlife habitat and should not be given away to livestock producers. Despite claims in the environmental assessment that haying and grazing will increase forage and cover for wildlife following the proposed operations, there is no scientific evidence to support this. With reduced production of plants due to drought, any further reduction from livestock use will result in adverse impacts to wildlife that rely on the WMAs.

#120

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Saturday, August 07, 2021 4:27:36 PM
Last Modified: Saturday, August 07, 2021 4:29:06 PM
Time Spent: 00:01:30
IP Address: 67.143.192.235

Page 1

Q1

Please provide the following information:

Name:	Jim Homison
City/Town:	STANFORD
State/Province:	MT

Q2

Please comment on the Draft Environmental Assessment: Emergency Grazing and Haying Leases on Select FWP Wildlife Management Areas.

All,

Given the emergency nature of this proposal, I support approval of this draft Environmental Assessment. I think the "exchange for services" form of payment as part of the proposal would be an efficient means of accomplishing some on-the-ground improvements if used correctly while supporting the agriculture interests around the state.

There is one addition that should be included in the final decision notice. It is proposed that lessees would be selected using a random drawing system, (page 16). My suggestion is that for an agricultural producer to be eligible to participate in the random drawing, they have previously demonstrated at least some commitment to providing public hunting opportunities on properties under their control. Some examples of this commitment could include participation in the block management program or wildlife easements that include hunting opportunity or simply allowing some hunters that stop-and-knock.

From the 50000 feet level, it concerns me that an Environmental Assessment is required to respond to Governor Greg Gianforte's statewide drought emergency declaration as required by MCA 87-1-209. Ideally, the emergency declaration would have included a temporary exemption to this process for the life of the declaration for one-time emergency proposals. Of course, FWP is not responsible for that oversight and for this reason, the governors' office is receiving a copy of this comment and hopefully the governor will consider temporary exclusions in future emergency declarations.

Or, again looking to the future, perhaps legislature should address exemptions to the MEPA process this by amending MCA 87-1-209 so that actions such as this proposal can be implemented when needed without delay. I'm sending a copy of this comment to key members of legislature's fish/wildlife/game/parks committees with hopes that they agree.

Emergency fishing closures, hoot owl fishing restrictions and the like seem to be a product of the Administrative Rules of Montana (ARM) process. I'm thinking the ARM process would probably not be a useful tool in this case unless the MCA was changed. My reason for bringing up emergency fishing closures and hoot owl fishing restrictions is that I believe that leasing appropriate WMA land for grazing/haying should be no more difficult than implementing those closures and restrictions when appropriate management action points are reached. In this case of leasing appropriate WMA land for grazing/haying the appropriate management action point would be the Governors drought emergency declaration.

Lastly, this proposal seems to be driven by the Wildlife Division of FWP since only WMA lands are included. My personal observations suggest that certain Fishing Access properties could have been included. I suspect some state parks properties would work too. For this reason, I am sending Director Worsech a copy of this comment although I expect he'll see it anyway.

Thank you for the opportunity to comment.

Respectfully,

Jim Homison
Stanford, Montana

#121

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Saturday, August 07, 2021 5:51:36 PM
Last Modified: Saturday, August 07, 2021 5:53:13 PM
Time Spent: 00:01:37
IP Address: 108.218.57.52

Page 1

Q1

Please provide the following information:

Name: Irene Simmons
City/Town: Pasadena
State/Province: CA

Q2

Please comment on the Draft Environmental Assessment: Emergency Grazing and Haying Leases on Select FWP Wildlife Management Areas.

Livestock grazing and haying operations will add additional stress to already stressed wildlife populations.

WMAs are set aside to support wildlife and wildlife habitat and should not be given away to livestock producers.

Despite claims in the environmental assessment that haying and grazing will increase forage and cover for wildlife following the proposed operations, there is no scientific evidence to support this.

With reduced production of plants due to drought, any further reduction from livestock use will result in adverse impacts to wildlife that rely on the WMAs.

#122

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Saturday, August 07, 2021 6:51:53 PM
Last Modified: Saturday, August 07, 2021 6:53:21 PM
Time Spent: 00:01:27
IP Address: 99.20.69.156

Page 1

Q1

Please provide the following information:

Name: Suzanne Hodges
City/Town: Rancho Cordova
State/Province: CA

Q2

Please comment on the Draft Environmental Assessment: Emergency Grazing and Haying Leases on Select FWP Wildlife Management Areas.

Leave the lands for wildlife to graze, including wild horses, burros

#123

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Saturday, August 07, 2021 7:17:30 PM
Last Modified: Saturday, August 07, 2021 7:39:59 PM
Time Spent: 00:22:28
IP Address: 71.37.190.213

Page 1

Q1

Please provide the following information:

Name: **Richard HOFFMAN**
City/Town: **FLORENCE**
State/Province: **MT**

Q2

Please comment on the Draft Environmental Assessment: Emergency Grazing and Haying Leases on Select FWP Wildlife Management Areas.

Since we all know that we are in the midst of the worst drought in past years, I do see leases for this year to take place as the FWP has proposed on Wildlife area's. These leases should only be just for this year. Just a note on the ninepipes area. The habitat has really went down hill since the tribe has take over the management of that area and bird hunting is suffering from that..

#124

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Saturday, August 07, 2021 7:52:16 PM
Last Modified: Saturday, August 07, 2021 7:54:08 PM
Time Spent: 00:01:51
IP Address: 24.255.213.210

Page 1

Q1

Please provide the following information:

Name: Victoria Bieber
City/Town: Manhattan
State/Province: KS

Q2

Please comment on the Draft Environmental Assessment: Emergency Grazing and Haying Leases on Select FWP Wildlife Management Areas.

Drought is no reason to hv cattle on your Wildlife management areas. The wildlife NEED every opportunity to thrive. TAKE cattle off, Wildlife will thrive!!

#125

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Saturday, August 07, 2021 7:56:15 PM
Last Modified: Saturday, August 07, 2021 7:58:57 PM
Time Spent: 00:02:42
IP Address: 76.14.63.173

Page 1

Q1

Please provide the following information:

Name: Barbara Ellen
City/Town: Walnut Creek
State/Province: CA

Q2

Please comment on the Draft Environmental Assessment: Emergency Grazing and Haying Leases on Select FWP Wildlife Management Areas.

Cattle are already overpopulated, not to mention subsidized. No more are needed. Wildlife areas are for wildlife, NOT for overrunning with more and more cattle. Why is this not crystal clear to FWP?

#126

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Saturday, August 07, 2021 8:50:11 PM
Last Modified: Saturday, August 07, 2021 9:03:21 PM
Time Spent: 00:13:09
IP Address: 96.235.63.245

Page 1

Q1

Please provide the following information:

Name: Wendy Reitenauer
City/Town: Pittsburgh
State/Province: PA

Q2

Please comment on the Draft Environmental Assessment: Emergency Grazing and Haying Leases on Select FWP Wildlife Management Areas.

Leave wildlife areas for WILDLIFE ONLY. Stop treating wildlife like they are garbage to be disposed of. They belong to the American people no matter what state we live in. Public lands are for wildlife, not for the benefit of private individuals or companies. It's not our job to support the habitat-destroying cattle industry. Maybe they need to scale back.

#127

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Saturday, August 07, 2021 10:29:31 PM
Last Modified: Saturday, August 07, 2021 10:30:27 PM
Time Spent: 00:00:55
IP Address: 208.104.196.69

Page 1

Q1

Please provide the following information:

Name: **Rod Ridenour**
City/Town: **Draper**
State/Province: **UT**

Q2

Please comment on the Draft Environmental Assessment: Emergency Grazing and Haying Leases on Select FWP Wildlife Management Areas.

Montana needs to STOP killing Wildlife-Livestock grazing and haying operations will add additional stress to already stressed wildlife populations.

#128

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Sunday, August 08, 2021 7:05:11 AM
Last Modified: Sunday, August 08, 2021 7:14:46 AM
Time Spent: 00:09:35
IP Address: 154.21.216.117

Page 1

Q1

Please provide the following information:

Name: Charles Denowh
City/Town: Helena
State/Province: MT

Q2

Please comment on the Draft Environmental Assessment: Emergency Grazing and Haying Leases on Select FWP Wildlife Management Areas.

On behalf of United Property Owners of Montana, I urge your support of adopting the emergency grazing and haying leases on WMAs. This devastating drought will leave lasting impacts on Montana's agriculture economy as it will take years for ranchers to build back their cow herds. The state should do everything in its power to mitigate the effects of this drought, including grazing and haying on WMAs.

The loss of hay and forage by ranchers has been exacerbated by the over-objective big game populations in many areas, particularly elk. Elk numbers today are nearly double the statewide objective level.

#129

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Sunday, August 08, 2021 9:33:56 AM
Last Modified: Sunday, August 08, 2021 9:34:37 AM
Time Spent: 00:00:41
IP Address: 68.226.69.170

Page 1

Q1

Please provide the following information:

Name: **pauline st denis**
City/Town: **brooklyn**
State/Province: **NY**

Q2

Please comment on the Draft Environmental Assessment: Emergency Grazing and Haying Leases on Select FWP Wildlife Management Areas.

"With the impacts of climate change steadily increasing, this drought could be a tipping point for many native wildlife populations in Montana," said Leroux. "It is critical that officials in Montana start to recognize the immense value of protecting our native wildlife and ecosystems and conserving their habitats, especially under the stress of drought." I'd like wildlife prioritized over private cattle operations -

#130

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Sunday, August 08, 2021 9:44:06 AM
Last Modified: Sunday, August 08, 2021 9:46:41 AM
Time Spent: 00:02:35
IP Address: 68.226.69.170

Page 1

Q1

Please provide the following information:

Name: pauline st denis
City/Town: brooklyn
State/Province: NY

Q2

Please comment on the Draft Environmental Assessment: Emergency Grazing and Haying Leases on Select FWP Wildlife Management Areas.

Livestock grazing and haying operations will add additional stress to already stressed wildlife populations. WMAs are set aside to support wildlife and wildlife habitat and should not be given away to livestock producers. Despite claims in the environmental assessment that haying and grazing will increase forage and cover for wildlife following the proposed operations, there is no scientific evidence to support this. With reduced production of plants due to drought, any further reduction from livestock use will result in adverse impacts to wildlife that rely on the WMAs. As a photographer I want my public lands protected from wildlife- I want the range protected by future generations. I have witnessed the destruction of public land from wild stock grazing - Livestock grazing is the single most ecologically destructive activity happening in the Western United States today. ... [T]o stop the continued destruction of the entire region, public lands ranching must cease.

#131

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Sunday, August 08, 2021 11:35:06 AM
Last Modified: Sunday, August 08, 2021 12:06:36 PM
Time Spent: 00:31:30
IP Address: 76.75.53.80

Page 1

Q1

Please provide the following information:

Name: Spencer Metzler
City/Town: Lima
State/Province: MT

Q2

Please comment on the Draft Environmental Assessment: Emergency Grazing and Haying Leases on Select FWP Wildlife Management Areas.

DO NOT ALLOW THIS!! There is barely any forage for wildlife let alone ranch stock. Next to nothing grew this year, it is already going to be a hard winter for deer and elk.

#132

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Sunday, August 08, 2021 1:52:52 PM
Last Modified: Sunday, August 08, 2021 1:54:44 PM
Time Spent: 00:01:52
IP Address: 184.166.147.36

Page 1

Q1

Please provide the following information:

Name: Joe Jacobs
City/Town: East Helena
State/Province: MT

Q2

Please comment on the Draft Environmental Assessment: Emergency Grazing and Haying Leases on Select FWP Wildlife Management Areas.

Why is it that when domestic livestock suffer we seem to always tap wildlife to make up the shortfall? This might be the year that giving cows access to that grass in the high country takes it away from the elk. Officials had better hope that we don't have a severe winter...

#133

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Sunday, August 08, 2021 2:08:48 PM
Last Modified: Sunday, August 08, 2021 2:19:03 PM
Time Spent: 00:10:15
IP Address: 206.127.117.247

Page 1

Q1

Please provide the following information:

Name: **George Ochenski**
City/Town: **Helena**
State/Province: **MT**

Q2

Please comment on the Draft Environmental Assessment: Emergency Grazing and Haying Leases on Select FWP Wildlife Management Areas.

Totally opposed to this. As someone who has bought fishing and hunting licenses in Montana for 50 years -- and has supported using those revenues to purchase wildlife management areas -- this is an abuse of publicly owned resources for private, for-profit businesses.

If their herd is too big for their ranch, sell some cows -- that's how the FREE MARKET so totally embraced by this anti-government governor works. And of course there's always the very generous federal bailout for "producers" whenever they get in trouble from drought, rain, snow, heat, cold, grasshoppers, hail or just about anything else that diminishes their expected crop revenues.

Given the federal \$\$ they will receive, there's no reason to allow cattle ranchers to feed and water their private cattle on public wildlife management area lands.

Moreover, there are many other "non-game" species on these lands that need the cover, the water, the intact riparian areas, all of which will suffer under this unbelievable proposal to allow private parties to simply "live off the land" -- the public land, resources, and specifically-dedicated wildlife management land at that.

The public gains nothing from this proposal and stands to lose wildlife forage, cover, water and beat the range to death since it's already suffering the same drought conditions as the private rangelands. Speaking of which, if cows were so beneficial to the landscape, how come they have to go to wildlife management areas to graze and drink? You'd think their wonderful stewardship would have kept their home range in better shape than the "unmanaged" wildlife areas. Guess not, eh?

No, no, a thousand times no. This is a betrayal of public trust to take care of our public wildlife on public lands specifically paid for to do just that.

What next from this benighted administration?

#134

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Monday, August 09, 2021 6:47:19 AM
Last Modified: Monday, August 09, 2021 6:51:11 AM
Time Spent: 00:03:51
IP Address: 172.58.43.117

Page 1

Q1

Please provide the following information:

Name: Bob Donat
City/Town: Whitehall
State/Province: MT

Q2

Please comment on the Draft Environmental Assessment: Emergency Grazing and Haying Leases on Select FWP Wildlife Management Areas.

You people seem to work for the cattle industry and not the people or wildlife

You need to be kicking ranchers off public land and creating better habitat for native species. End shoulder seasons this is a joke there are no elk left now

■■■■ cattle

#135

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Monday, August 09, 2021 9:12:29 AM
Last Modified: Monday, August 09, 2021 9:18:35 AM
Time Spent: 00:06:06
IP Address: 47.45.142.46

Page 1

Q1

Please provide the following information:

Name: Richard Douglass
City/Town: Butte
State/Province: MT

Q2

Please comment on the Draft Environmental Assessment: Emergency Grazing and Haying Leases on Select FWP Wildlife Management Areas.

If conducted properly, the occasional cattle grazing may be helpful. Mt Hagin is an example. However, if this is to be used to simply expand cattle grazing, it may not be good.

Three comments:

1. don't expect wildlife range improvement until after the 2022 growing season. Some negative impacts to wildlife will occur this winter.
 2. Only ranchers that support public hunting should participate.
 3. Grazing fees should be at market value not US Forest Service rates.
-

#136

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Monday, August 09, 2021 9:13:18 AM
Last Modified: Monday, August 09, 2021 9:25:02 AM
Time Spent: 00:11:44
IP Address: 71.15.222.178

Page 1

Q1

Please provide the following information:

Name: Trevor Mills
City/Town: Missoula
State/Province: MT

Q2

Please comment on the Draft Environmental Assessment: Emergency Grazing and Haying Leases on Select FWP Wildlife Management Areas.

You guys are supposed to be protecting OUR PUBLIC LANDS! Now we are opening up hunter-funded wmas to private landowners at no charge? If you guys are going to allow ranchers to come benefit from OUR PUBLIC LANDS, maybe you guys could work it out so their PRIVATE lands are benefitting hunters. All private landowners who want to benefit from our public lands should have to enroll in Block Management. It's only fair. This damn country is always bailing out the HAVES at the expense of the HAVE NOTS. Where is the reciprocation?!?!

#137

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Monday, August 09, 2021 9:26:47 AM
Last Modified: Monday, August 09, 2021 9:28:35 AM
Time Spent: 00:01:47
IP Address: 72.255.183.168

Page 1

Q1

Please provide the following information:

Name: Lacey Rasmussen
City/Town: White Sulphur Springs
State/Province: MT

Q2

Please comment on the Draft Environmental Assessment: Emergency Grazing and Haying Leases on Select FWP Wildlife Management Areas.

This is a very beneficial idea - especially for this year of drought and fires.

#138

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Monday, August 09, 2021 11:13:20 AM
Last Modified: Monday, August 09, 2021 11:32:03 AM
Time Spent: 00:18:43
IP Address: 71.15.218.217

Page 1

Q1

Please provide the following information:

Name: Ryan
City/Town: Great Falls
State/Province: MT

Q2

Please comment on the Draft Environmental Assessment: Emergency Grazing and Haying Leases on Select FWP Wildlife Management Areas.

I spend a lot of time hunting State Lands that are terribly overgrazed without any repercussions for the offenders. When the State addresses these problems I will have more confidence in future issues such as this. The proposal also address noxious weeds by saying you selected areas that noxious weeds were not the dominant species but not where the cattle are being brought in from. Monitoring grazed sites in subsequent years and spraying weeds is expensive.

#139

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Monday, August 09, 2021 12:33:53 PM
Last Modified: Monday, August 09, 2021 12:35:00 PM
Time Spent: 00:01:07
IP Address: 12.164.121.34

Page 1

Q1

Please provide the following information:

Name: Paul futch
City/Town: Missula
State/Province: MT

Q2

Please comment on the Draft Environmental Assessment: Emergency Grazing and Haying Leases on Select FWP Wildlife Management Areas.

This is bullshit dislike not fair don't pass this

#140

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Monday, August 09, 2021 12:33:00 PM
Last Modified: Monday, August 09, 2021 12:36:09 PM
Time Spent: 00:03:08
IP Address: 72.174.142.240

Page 1

Q1

Please provide the following information:

Name: Clare Beelman
City/Town: Missoula
State/Province: MT

Q2

Please comment on the Draft Environmental Assessment: Emergency Grazing and Haying Leases on Select FWP Wildlife Management Areas.

Wildlife Management Areas should be managed for wildlife, not livestock. The drought will undoubtedly negatively affect wildlife. FWP should not allow livestock interests to further negatively impact wildlife, especially in WMAs.

#141

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Monday, August 09, 2021 2:59:37 PM
Last Modified: Monday, August 09, 2021 3:02:42 PM
Time Spent: 00:03:05
IP Address: 174.70.70.60

Page 1

Q1

Please provide the following information:

Name: Cecilia M
City/Town: Turah
State/Province: MT

Q2

Please comment on the Draft Environmental Assessment: Emergency Grazing and Haying Leases on Select FWP Wildlife Management Areas.

If you're opening up OUR public land for private landowners to use, that must mean you are also expecting the private landowners to open up THEIR land for the public's use. If that isn't the case, then I strongly oppose this "emergency" measure!

#142

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Tuesday, August 10, 2021 8:55:30 AM
Last Modified: Tuesday, August 10, 2021 9:13:00 AM
Time Spent: 00:17:29
IP Address: 216.14.237.187

Page 1

Q1

Please provide the following information:

Name: Skip Palmer
City/Town: Charlo
State/Province: MT

Q2

Please comment on the Draft Environmental Assessment: Emergency Grazing and Haying Leases on Select FWP Wildlife Management Areas.

More weeds than hay. It must be cut or burnd. To emprove management of the Ninepipe WMA ! Hay for Cows is #2 weed managent #1. Skip Palmer former oner of the land on your map of Ninepipe. Thank You.

#143

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Tuesday, August 10, 2021 9:50:56 AM
Last Modified: Tuesday, August 10, 2021 10:26:59 AM
Time Spent: 00:36:03
IP Address: 35.133.17.179

Page 1

Q1

Please provide the following information:

Name: garrett (Gary) ouldhouse
City/Town: Anaconda
State/Province: MT

Q2

Please comment on the Draft Environmental Assessment: Emergency Grazing and Haying Leases on Select FWP Wildlife Management Areas.

The Anaconda Sportsmen's Club supports this one time Agriculture Lease of Haying or Grazing on the WMA's listed. We see this to be a win/win for Stock Growers it's more feed for their Livestock helping them get threw this drought: for the Sportsmen and the Public it's one time " treatment" to invigorate the WMA's grasses and forbs for the Wildlife to feed on. We request that an accountable analysis of the condition of the WMA be done before and after. Thank You Gary Ouldhouse ASC President

#144

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Tuesday, August 10, 2021 2:05:27 PM
Last Modified: Tuesday, August 10, 2021 2:09:38 PM
Time Spent: 00:04:10
IP Address: 69.146.14.116

Page 1

Q1

Please provide the following information:

Name:	Clinton Nagel
City/Town:	Bozeman
State/Province:	MT

Draft Environmental Assessment: Emergency Grazing and Haying Leases on Select FWP Wildlife Management Areas

Q2

Please comment on the Draft Environmental Assessment: Emergency Grazing and Haying Leases on Select FWP Wildlife Management Areas.

August 10, 2021

Rick Northrup
Habitat Bureau Chief
Montana Fish, Wildlife and Parks
P.O. Box 200701
Helena, MT 59620

Dear Mr. Northrup:

In recent weeks, the Department of Montana Fish, Wildlife and Parks (FWP) publicly disclosed they were planning to open a select group of wildlife management areas (WMA) around the state to livestock grazing and haying interests as a result of drought conditions hampering the state. The draft environmental assessment released on July 30, 2021 specifies the scope of this program. The list of 14 different WMAs encompasses a range of acreages from 8 to 4100 acres. In reviewing the treatment rationale for this action, FWP seems to be relying back on the old theory that livestock grazing and associated actions are good for at least most wildlife. Please cite the research that backs this statement. In the past, The Gallatin Wildlife Association (GWA) has submitted many peer-reviewed articles contrary to this theory. GWA is not convinced this proposed action by FWP is as sound as it is being promoted.

First let us describe why the Gallatin Wildlife Association has an interest in this issue. We are a local, all volunteer wildlife conservation organization dedicated to the preservation and restoration of wildlife, fisheries, habitat and migration corridors in Southwest Montana and the Greater Yellowstone Ecosystem, using science-based decision making. We are a nonprofit 501 (c)(3) organization founded in 1976. GWA recognizes the intense pressures on our wildlife from habitat loss and climate change, and we advocate for science-based management of public lands for diverse public values, including but not limited to hunting and angling.

The first thought that came to mind is what is FWP doing to mitigate the effects of drought and climate change on wildlife? These lands were set aside, designated to be for wildlife. Where is the concern of how drought conditions are affecting our biodiversity, flora and fauna? This organization has tirelessly raised the issue of how livestock grazing has affected the quality of riparian and other habitats on several WMAs for more than 10 years. Has there been any progress in the habitat status of these lands? One would think that when it came time for emergency use, such as in times of drought, wildlife designated lands would have first priority for the purpose for which they were intended. Why does this not seem to be the case? We think we know why, but we want to express our disappointment in the priorities and tone chosen by FWP at this time. The picture below highlights our concern of past actions in how livestock have deteriorated riparian habitat.

This picture is of Fleecer WMA taken on June 3, 2015. Note the hoof action by livestock on this resource, and the lack of woody riparian vegetation. This is not proper wildlife habitat management. We hope this condition would not be allowed to perpetuate, especially in times of drought. One would only hope this condition has been rectified and repaired.

Basically, GWA is not reassured. We have not seen evidence where FWP has changed its policy toward wildlife when it comes to the proper management and priorities on WMAs. In fact, on page 16 of the draft EA, there is a statement indicating that FWP already manages 40 farming, grazing and haying leases on 24 different WMAs within the system. This raises the question, when will wildlife obtain the priority they deserve? Livestock grazing will increase more soil compaction, more soil erosion around riparian areas, place wildlife in competition with livestock for food, increase likelihood of weed infestation and place more human activity on wildlife habitat. We don't see the overall benefit here for wildlife. We don't automatically buy into the proclaimed theory by FWP that livestock grazing

Draft Environmental Assessment: Emergency Grazing and Haying Leases on Select FWP Wildlife Management Areas

improves the habitat for elk or other ungulates. Again, we would like to see the evidence and science of this fact. Most science we have seen is contrary.

Moreover, we have suggested that FWP test its theory that livestock grazing is enhancing any big-game herd using an experimental design including randomization, replication and controls. Across 24 WMAs, there must be several good opportunities to test if private livestock grazing on a WMA has achieved stated FWP goals. Such testing is the essence of adaptive management.

What some species may benefit from livestock grazing, could very well likely be detrimental to others. Biodiversity takes a hit and if there is one thing we must do during times of drought; it is to protect the biodiversity. Placing crops upon the land is the opposite of that goal. Our fear is based upon the fact that so many times agencies promote actions utilizing the best management practices, but in reality, those practices don't seem to materialize. We may have good intentions, but we as a people and those properly assigned government agencies are poor in the follow through. We have seen no evidence this will change.

For all of these reasons, GWA cannot support the policy as stated in the draft EA as Alternative B, the Proposed Alternative. We are not sure that FWP has earned the trust of our organization to support such action. therefore, we favor Alternative A, the No Action Alternative. We believe this action is politically based, reflecting the political dominance of the Montana livestock industry. That said, we recognize the appropriateness of FWP being a good neighbor when there can be collaboration that allows only a minimum of new stress upon our wildlife in the short term. We recommend that FWP review the list of emergency grazing projects and eliminate those for which the potential for significant impacts to wildlife habitat cannot be verified.

FWP states the following in the draft EA itself. Page 15 of the draft EA states.

"Montana's Wildlife Management Areas (WMAs) provide a system of lands managed by FWP for the primary purpose of providing effective wildlife habitat and secondarily supporting recreation opportunities that are compatible with wildlife."

We believe that FWP needs to return to that original purpose. There is no better time to do so than now.

It is ironic that at the time we are writing these comments, the United Nations Intergovernmental Panel on Climate Change has come out with a new report calling the status of the world's climate as "Code Red for Humanity" claiming that the wild weather events will worsen as a result of climate change. If this is the description for our species, what would it be for the variety of other species existing on this planet? This is the warning that we are trying to raise. Agencies who are responsible for wildlife, state, tribal and federal, must not ignore the conditions on the ground, yet it seems like that is exactly what is happening. At some point, wildlife must become the priority. We repeat, there is no better time than now.

Sincerely,

Clinton Nagel, President
Gallatin Wildlife Association

#145

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Tuesday, August 10, 2021 3:53:27 PM
Last Modified: Tuesday, August 10, 2021 4:01:58 PM
Time Spent: 00:08:30
IP Address: 71.15.203.165

Page 1

Q1

Please provide the following information:

Name: Patricia Simmons
City/Town: Bozeman
State/Province: MT

Q2

Please comment on the Draft Environmental Assessment: Emergency Grazing and Haying Leases on Select FWP Wildlife Management Areas.

I am opposed to your plan to allow private businesses to utilize for free our public lands that were purchased for wildlife and wildlife habitat by the sportsmen and women of Montana through Habitat Montana. These WMAs are supporting the wildlife of Montana, both game and non-game species. Climate change is impacting everyone - humans, agriculture, wildlife of all types. Agriculture consists of private ranches and farms both owned and leased and it is up to private businesses to figure out their own ways to protect their animals, provide for their food, etc. They should be providing their own methods of maintaining their businesses from weather, climate and other events. For free is outrageous and taking away food from wildlife, allowing waters and streams to be stomped on, roads and haying equipment and other destruction of our WMAs is unconscionable. We've had droughts before in many years, and the ranchers and farmers figured out on their own how to deal with their situation. MTFWP should be managing WMAs totally for the wildlife needs and the hunters and recreationists usage. STOP THE STEAL!

#146

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Tuesday, August 10, 2021 4:59:22 PM
Last Modified: Tuesday, August 10, 2021 5:19:21 PM
Time Spent: 00:19:58
IP Address: 97.121.204.248

Page 1

Q1

Please provide the following information:

Name: Ellen Trygstad
City/Town: Bozeman
State/Province: MT

Q2

Please comment on the Draft Environmental Assessment: Emergency Grazing and Haying Leases on Select FWP Wildlife Management Areas.

Thank you for the opportunity to comment. Opening up FWP Wildlife Management Areas for livestock will bring many problems. First, is the increased potential for disease transfer. Second, is the damage to landscape, especially with any rain or in any riparian areas, due to the impacts of many livestock species notably harder on the landscape than wildlife. Third, is the damage to plants - both forbes and grasses- from overgrazing as well as footfall. Fourth, cattle will be exposed to plant varieties that may safely flourish with wildlife, but are poisonous to cattle and other livestock. Finally, the presence of livestock in a wildlife management area is disruptive to wildlife - stressful, competitive for food and water, and inviting of predator activity. This latter could lead to lethal culling of predators as well as giving predators in the area a "taste" for livestock.

Helping out ranchers and farmers with livestock is hugely important. I recommend a big, statewide, even national, fund drive to buy appropriate hay from regions that have hay for sale, or/and to buy other feeds - corn, bagged food, whatever appropriate for the species. Drought in the West is a national crisis, and I have no doubt people from all over would help out with whatever is specifically requested.

No one wants farmers and ranchers to have to downsize, or struggle through the winter. A land bank could be set up establishing who has grazing on private property, type of forage, size of area, and description of fencing and farmers/ranchers could relocate livestock to currently unused areas that are typically livestock pasturage.

But mostly, a central collection place for financial donations, and purchase of appropriate types and tonnage of forage makes the most sense. This could be stored at fairgrounds in every county in the affected regions, and picked up by farmers/ranchers as they can. If they can haul livestock to FWP wildlife management areas, they can pick up hay. Likely much closer to them so more convenient.

This is an opportunity for residents and citizens to help out their food producers, their family farmers and ranchers. I think it would be very successful to raise plenty of money to purchase feed.

#147

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Tuesday, August 10, 2021 5:49:27 PM
Last Modified: Tuesday, August 10, 2021 6:04:49 PM
Time Spent: 00:15:22
IP Address: 108.59.124.126

Page 1

Q1

Please provide the following information:

Name:	David Harris
City/Town:	Crane
State/Province:	MT

Q2

Please comment on the Draft Environmental Assessment: Emergency Grazing and Haying Leases on Select FWP Wildlife Management Areas.

We pay good money to have wildlife biologists manage our wildlife areas. I believe in multiple use, however, in this case it is a horrible idea. Due to the drouth our fish, birds, and all wildlife is also severely stressed. I do not believe it is in the best interest of wildlife to curtail the amount of feed and cover they have. Ranchers have already overgrazed their land as well as state land they have leased. If the government had not been cutting the CRP every yer without really needing the hay., it would be available now. If we short our wildlife in favor of cows,it could be devastating. Maybe it is time to lower theaums on state leases and check how they are managed.

#148

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Wednesday, August 11, 2021 4:48:35 AM
Last Modified: Wednesday, August 11, 2021 5:15:59 AM
Time Spent: 00:27:24
IP Address: 69.145.59.26

Page 1

Q1

Please provide the following information:

Name: Lester Kish
City/Town: Bozeman
State/Province: MT

Q2

Please comment on the Draft Environmental Assessment: Emergency Grazing and Haying Leases on Select FWP Wildlife Management Areas.

Removal of residual vegetation during a drought year is misguided wildlife management. Clearly, this action benefits a select few. And, they're not leases, they're freebies.

#149

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Wednesday, August 11, 2021 10:13:36 AM
Last Modified: Wednesday, August 11, 2021 10:22:56 AM
Time Spent: 00:09:20
IP Address: 69.145.231.49

Page 1

Q1

Please provide the following information:

Name: michael wickes
City/Town: bozeman
State/Province: MT

Q2

Please comment on the Draft Environmental Assessment: Emergency Grazing and Haying Leases on Select FWP Wildlife Management Areas.

I do Not support these grazing and haying leases. Most, if not all of these WMA's areas designated for grazing and haying are also winter habitat for a broad range of species. Winter habitat is deemed critical habitat and removing (grazing) the native grasses deprives that native species of feed (larger mammals, birds, etc.)) or cover (smaller mammals, insects, birds, etc.). The ranchers can find other sources of feed for their livestock, the wild/native species cannot.

#150

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Monday, August 09, 2021 9:17:09 AM
Last Modified: Wednesday, August 11, 2021 12:13:00 PM
Time Spent: Over a day
IP Address: 97.121.195.105

Page 1

Q1

Please provide the following information:

Name: Verne W House
City/Town: Bozeman
State/Province: MT

Q2

Please comment on the Draft Environmental Assessment: Emergency Grazing and Haying Leases on Select FWP Wildlife Management Areas.

The State should drop this proposal. FWP is to choose whether to starve wildlife of their winter food and habitat or help a few stockgrowers cope with their losses. Now, I sympathize with the stockgrowers; come winter, I will sympathize with starving wildlife on denuded WMA's.

Temporary is the key word. Agriculture's need for assistance is not temporary because the cause of drouth is not temporary, so why should we not expect the same sorry conditions next year? This proposal will set a precedent for further commercialization of WMA's.

The proposal was easy to read but hard to swallow. It reveals a view that WMA's are just space if they aren't hayed or grazed by livestock.

Free vs bid: What is to prevent a lottery winner from quietly sell its opportunity to someone else?

The "benefits" from hoofed animals are dubious at best. I served on State Water Development Advisories, recommending approval of many grants to fence cows off streambanks, and here we are to buy your proposition that lessees will be monitored. By whom? Wardens? Using what authority?

The proposal touts other supposed benefits: durf removal and pheasants galore. Bull.

Given the severity of the drouth, there may not be anything left for either livestock or wildlife. We need to take action on global warming. Proponents will be back next year with the same plea. Your Goal 1 is the only one you should pursue.

#151

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Tuesday, August 10, 2021 11:49:17 PM
Last Modified: Wednesday, August 11, 2021 5:38:51 PM
Time Spent: 17:49:33
IP Address: 72.174.222.126

Page 1

Q1

Please provide the following information:

Name: Rachel Cone, Montana Farm Bureau Federation
City/Town: Bozeman
State/Province: MT

Q2

Please comment on the Draft Environmental Assessment: Emergency Grazing and Haying Leases on Select FWP Wildlife Management Areas.

The Montana Farm Bureau Federation wishes to express support for this proposal. This year, farmers and ranchers are facing so many challenges caused by the severe drought in the American West, especially in Montana. This drought will force many of them to make the tough choices of selling their herds.

With drought, comes the lack of ability to produce enough feed and forages for these animals to make it through the cold winter months. This has brought the price of hay up to extremely high levels, most of which ranchers cannot pencil out to continue their business. Allowing this proposal to move forward, would give that much more ability for ranchers to utilize resources to be able to feed their herds.

The proposed Emergency Grazing and Haying for leases on Select FWP Wildlife Management Areas could benefit many ranchers that are seeing the challenges caused by this year's drought. We strongly support getting as many resources to ranchers as possible and see this being a great option. We appreciate greatly the work by FWP to give ranchers another option in these trying times.

#152

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Wednesday, August 11, 2021 9:34:57 PM
Last Modified: Wednesday, August 11, 2021 10:18:00 PM
Time Spent: 00:43:02
IP Address: 107.77.200.20

Page 1

Q1

Please provide the following information:

Name: **Jeffrey Sturm**
City/Town: **Helena**
State/Province: **MT**

Q2

Please comment on the Draft Environmental Assessment: Emergency Grazing and Haying Leases on Select FWP Wildlife Management Areas.

Although I'm not excited about cattle and haying equipment on some favorite hunting grounds I understand the critical times we are in with the extended drought.

FWP should although consider if these emergency grazing and haying leases are in line with the management plans of those WMA's and do not change the overall purposes of the WMA's which I believe is largely to support wildlife. In some cases the use of livestock to regenerate some old stands of grass may be helpful but should be a part of a management plan not a short term solution to the current situation.

I have a few concerns including if grazing would be allowed in riparian ares where the damage could be long term, grazing in shelterbelts where again the damage could be long term, the lease time frames overlapping with the hunting season and the random selection process of successful bidders. I think some consideration should be given to individuals who have a history of leasing land from FWP and have a good record of compliance with FWP on those leases

#153

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Thursday, August 12, 2021 11:48:32 AM
Last Modified: Thursday, August 12, 2021 11:59:28 AM
Time Spent: 00:10:55
IP Address: 161.7.120.8

Page 1

Q1

Please provide the following information:

Name: Martin Landry
City/Town: Helena
State/Province: MT

Q2

Please comment on the Draft Environmental Assessment: Emergency Grazing and Haying Leases on Select FWP Wildlife Management Areas.

I support alternative A. If the drought is significant enough to impact livestock. I is significant enough to impact wildlife. The farmer and rancher have alternatives that wildlife do not. If these areas truly would benefit from grazing, as noted in the assessment. Put them on your schedule to do them when the areas are not under drought pressure.

#154

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Thursday, August 12, 2021 1:20:17 PM
Last Modified: Thursday, August 12, 2021 1:36:08 PM
Time Spent: 00:15:51
IP Address: 69.144.171.198

Page 1

Q1

Please provide the following information:

Name: **Dan Vermillion**
City/Town: **Livingston**
State/Province: **MT**

Q2

Please comment on the Draft Environmental Assessment: Emergency Grazing and Haying Leases on Select FWP Wildlife Management Areas.

Montanans purchased these ranches for the purpose of providing winter range and habitat for Montana's wildlife in an effort to reduce wildlife's impact on surrounding ranchlands during the brown grass months. However, if WMA's are hayed or grazed, that takes much needed protein from wildlife and increases conflict between wildlife and Montana's agricultural producers. This is wildlife habitat purchased for the express purpose of decreasing these conflicts. If you decide to move ahead with this, then I think it is only correct to assume that you will decrease any late season hunts and any game damage hunts in the area when the ungulates leave the WMA in pursuit of food. If this grazing/haying exemption would have a meaningful impact on helping a producer get through the year, then I would be supportive. But, this approach feels like it is too late to do any good and would do irreparable harm to the Department's ability to manage our WMA's for wildlife AND livestock as intended. I should also note that, in the DSA, these WMA's help minimize the commingling of livestock and potentially sero-positive elk. By forcing elk off the WMAs and into the proximity of livestock, you will be increasing the likelihood of a positive brucellosis hit in a local producer. This is a reasonable risk if the reward was adequate but, in this case, I don't think the benefit to local producers will outweigh the potential risks to them. This has been a tough year for everyone. Let's not make it harder.

#155

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Saturday, August 07, 2021 10:27:36 PM
Last Modified: Thursday, August 12, 2021 2:08:02 PM
Time Spent: Over a day
IP Address: 216.14.237.41

Page 1

Q1

Please provide the following information:

Name:	Travis Heater
City/Town:	Trout Creek
State/Province:	MT

Q2

Please comment on the Draft Environmental Assessment: Emergency Grazing and Haying Leases on Select FWP Wildlife Management Areas.

I strongly disagree with the proposal for emergency grazing and haying of FWP's Wildlife Management Areas. These WMAs were purchased with hunter and angler dollars with the understanding that the primary purpose of these lands is for the benefit of wildlife. I understand the dire situation that some ranchers are currently facing due to the severe drought currently affecting Montana, but the wildlife that depends on the forage and water found on these WMAs is also facing a dire situation. The grazing and haying MAY provide some limited benefit for wildlife in the future, but right now and during the upcoming winter is when these drought stricken wildlife species are the most vulnerable to loss of secure habitat, loss of forage, intrusion by domestic animals and machinery, and negative effects to local water sources. This proposal has the potential to dramatically negatively affect not only big game animals but many other birds, amphibians, small game and other species during an extremely stressful long term drought.

The long term negative consequences of this proposal also has the potential to far outstrip any possible positives the action would have on the wildlife habitat found on these WMAs. In the proposal it even admits that "There may be debate by some as to the nature of the impacts of the Proposed Action, as there are varying perspectives as to the effectiveness of working lands approaches to habitat improvement and conservation." Ground compaction from cattle can actually have a negative impact by increasing and prolonging drought impacts due to less moisture absorption and increased run-off.

By introducing domestic cattle and farm machinery to these areas that you say currently have low amounts of invasive weeds, the potential for the introduction and further spread of habitat damaging invasive weeds will increase dramatically. I see nothing in the proposal about requiring the owners of the cattle to have them feed on weed free hay for several days before turning them loose on the WMAs. Inevitably, they will bring weed seeds onto the WMAs both through their fecal matter as well as seeds trapped in their fur. Since these leases are proposed as being completely free, the future weed mitigation measures necessary to combat the inevitable increase in invasives will be money stolen from other important work being done on these WMAs.

This proposal will also result in long term harm to riparian areas on the WMA's. Cattle have been shown to have very detrimental effects on stream side vegetation and bank stability resulting in more turbidity, warmer waters, less species diversity and diminished fish habitat. In the short term the unexpected increased activity of domestic animals and the human presence involved with grazing and haying will push wildlife away from these vital water sources. The proposal admits this will be a result of this action with the statement: "it is likely wildlife species would avoid the presence of livestock and increased human activity".

As a Montanan that hunts, fishes and recreates on many of these WMA, I strongly hope that you will not follow through with this proposal and manage these Wildlife Management Areas for the benefit wildlife, not private livestock as they were intended.

#156

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Thursday, August 12, 2021 1:58:08 PM
Last Modified: Thursday, August 12, 2021 2:14:22 PM
Time Spent: 00:16:13
IP Address: 76.75.23.22

Page 1

Q1

Please provide the following information:

Name: **Chisholm Christensen**
City/Town: **Hinsdale**
State/Province: **MT**

Q2

Please comment on the Draft Environmental Assessment: Emergency Grazing and Haying Leases on Select FWP Wildlife Management Areas.

To whom it may concern,

Wildlife Management areas are a valued tool for wildlife health and habitat. I'm happy to live and ranch adjacent to one. It improves our block management program and species regeneration. From time to time it is pertinent and beneficial for older vegetation and litter to be cleared on WMA's with regard to time of year, duration and degree. Clearing old, dry forage allows the land to regenerate much like clearing a yard that hasn't been mowed for a number of years. This becomes even more important in dry drought stricken years when fire is a pertinent threat.

I speak in support of opening grazing on wma's also because it is a help to many ranchers and farmers who are hurting due to drought. Many of whom support and work with fwp on their own properties and take wildlife considerations to account when making decisions on their own parcels.

Grazing is a tool, dry forage is a fire hazard to surrounding land and the trees existing on wma's, and making forage available to local ranchers and farmers is well received in their view of the department.

Good for the land, good for the animals, good for the people, good for the department.

Support responsible grazing of wildlife management areas.

#157

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Thursday, August 12, 2021 2:01:25 PM
Last Modified: Thursday, August 12, 2021 2:14:54 PM
Time Spent: 00:13:28
IP Address: 71.36.55.232

Page 1

Q1

Please provide the following information:

Name: Pam Willison
City/Town: Kalispell
State/Province: MT

Q2

Please comment on the Draft Environmental Assessment: Emergency Grazing and Haying Leases on Select FWP Wildlife Management Areas.

I oppose using the Wildlife Managment Areas for grazing or haying. My opposition is based on several reasons, but mainly, if the cattle/ranchers are short on feed because of drought conditions, then the wildlife is too. These areas were funded with taxpayer money for the specific purpose of assisting wildlife, so that's what they should be used for. Additionally, I strongly oppose that these areas would be given to cattle ranchers for free. Farmers and ranchers already get massive amounts of free government handouts/subsidies, courtesy of the taxpayers. Plus, if opening the WMA's is done now, then during the next legislative session, they will be there asking that such access be made permanent - bad precedent. Lastly, the damage the cattle grazing will do (trampled stream beds, soil compaction, spreading weeds, eating shrubs and trees, etc.) will take decades to recover. There are many reasons this is a bad idea and shouldn't be done.

#158

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Thursday, August 12, 2021 2:42:14 PM
Last Modified: Thursday, August 12, 2021 3:11:23 PM
Time Spent: 00:29:09
IP Address: 216.14.246.93

Page 1

Q1

Please provide the following information:

Name: Bruce Sterling
City/Town: Thompson Falls
State/Province: MT

Q2

Please comment on the Draft Environmental Assessment: Emergency Grazing and Haying Leases on Select FWP Wildlife Management Areas.

Over the course of my career with FWP I helped or directly purchase five Wildlife Management Areas in my jurisdiction. WMA's were purchased primarily for the sole benefit of wildlife species from elk to upland birds. While grazing and haying can prove to be a valuable management tool, it is typically designed for long term benefits. Emergency grazing/haying on our WMA's will remove quality forage that is needed for big game to help them survive this upcoming winter.

Grazing/haying will have zero benefits for wildlife and could have some long term negative impacts as well. Less forage could lead to lower fawn and calf over winter survival. Poor nutrition also can reduce production the following spring by reducing body condition of pregnant does and cows. Removal of residual and hiding cover by fall grazing/haying will have detrimental effects on upland game birds at Ninepipes WMA.

Our WMA's were purchased to benefit wildlife and not the private agriculture segment in Montana. Wildlife needs these areas along with the habitat and forage they produce now more than ever in this time of exceptional drought.

For these reasons, do not allow emergency grazing or haying on our wildlife management areas.

Sincerely,

Bruce Sterling

Retired FWP wildlife biologist

#159

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Thursday, August 12, 2021 3:15:36 PM
Last Modified: Thursday, August 12, 2021 3:36:51 PM
Time Spent: 00:21:14
IP Address: 67.42.174.24

Page 1

Q1

Please provide the following information:

Name: Dick Walton and Susan Newell
City/Town: Billings
State/Province: MT

Q2

Please comment on the Draft Environmental Assessment: Emergency Grazing and Haying Leases on Select FWP Wildlife Management Areas.

Too much of our public land is used for multiple purposes that negatively impact wildlife. By failing to address climate change we have caused and exacerbated this drought. WMAs are set aside for the benefit of wildlife - in contrast to the many areas in which other uses dominate. Yes the drought is challenging to our human activities including agriculture, But it is unconscionable for we (and FWP), who caused this and future droughts, to withdraw this protection for wildlife in the time they need it most. Would we withdraw food from hungry people when they are hungriest? If anything we should be REDUCING grazing and haying on public land for the benefit of wildlife during this drought. It is silly to suggest that grazing cattle and haying on land set aside for wildlife will benefit that wildlife.

#160

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Thursday, August 12, 2021 4:05:58 PM
Last Modified: Thursday, August 12, 2021 4:16:09 PM
Time Spent: 00:10:11
IP Address: 150.131.149.148

Page 1

Q1

Please provide the following information:

Name: Rebish/Konen Livestock
City/Town: Dillon
State/Province: MT

Q2

Please comment on the Draft Environmental Assessment: Emergency Grazing and Haying Leases on Select FWP Wildlife Management Areas.

Rebish/Konen Livestock is in support of establishing emergency haying and grazing leases on portions of 14 WMA's in the state. Our operation is specifically in support of establishing emergency grazing/haying on the Blacktail WMA east of Dillon. Opening these areas will be of great benefit to livestock producers throughout the state as a way to lessen the impact of the drought. Our ranch sees a huge benefit to this emergency agreement in regards to our sheep and cattle operation. Sheep follow efficient, effective grazing patterns and are under continual watch by our sheep herders making them perfect for this type of emergency grazing. Our cattle would also benefit from this type of grazing as they are currently in the area for summer and fall pasture. If passed, our ranch would like to be considered for this program. Thanks for your consideration and work to help livestock producers during this difficult cycle.

Sincerely,

Jon & Cathy Konen

Don Rebish

Keeley Konen-Fitzgerald

Kevin Konen

Kim Konen

#161

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Thursday, August 12, 2021 6:52:34 PM
Last Modified: Thursday, August 12, 2021 7:10:43 PM
Time Spent: 00:18:09
IP Address: 184.167.229.40

Page 1

Q1

Please provide the following information:

Name: LES CASTREN
City/Town: Butte
State/Province: MT

Q2

Please comment on the Draft Environmental Assessment: Emergency Grazing and Haying Leases on Select FWP Wildlife Management Areas.

Interested parties; I OPPOSE the emergency grazing-haying on the WMA's. A few considerations are (1) With the hot - dry summer winter ranges are also in poor condition. To now graze or hay off potential winter food sources for wildlife will only force them down on private lands sooner causing more problems feeding livestock this winter. (2) These properties were acquired by sportsmen for WILDLIFE to help keep wildlife off private lands. (3) Having these areas with grasses and forbs that may need treatments will end up being utilized by wildlife this winter with drought conditions affecting winter ranges also. (4) IF these areas are not used by wildlife this winter maybe a early and SHORT spring grazing program will help ranchers get livestock off regular feed areas sooner and benefit both the WMA and landowner grazing older grasses before spring green up.
THANK YOU
LES CASTREN

#162

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Thursday, August 12, 2021 7:36:06 PM
Last Modified: Thursday, August 12, 2021 7:41:47 PM
Time Spent: 00:05:40
IP Address: 98.127.177.168

Page 1

Q1

Please provide the following information:

Name: Jesse Coonfare
City/Town: BILLINGS
State/Province: MT

Q2

Please comment on the Draft Environmental Assessment: Emergency Grazing and Haying Leases on Select FWP Wildlife Management Areas.

I for one am completely against the emergency grazing draft. The biggest reason being lots less food for the elk in the winter months to come. Every animal is in a bad spot with this drought. And ranchers made a choice to raise cattle. So it should be their responsibility to find food for their cows. Elk aren't able to make a choice of where to eat. They can only eat where they find the food. And do not have a superior being such as a human looking after them. And yes, it does seem that private profit is taking priority when it comes to Montana wildlife. And don't think that us sportsman haven't taken notice. I myself, and lots of other fellow outdoorsman that I know personally have discussed this a few times in the last few years. I do hope you guys start to take that into consideration. The Montana resident who only has public land to hunt on to feed themselves for the winter to ease burden of buying food. Thats who your number 1 priority should be in this state. Thank you for your time and hope you make the right decision.

#163

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Thursday, August 12, 2021 9:17:32 PM
Last Modified: Thursday, August 12, 2021 9:21:04 PM
Time Spent: 00:03:31
IP Address: 66.97.229.165

Page 1

Q1

Please provide the following information:

Name: Glenn Ferren
City/Town: Saint Regis
State/Province: MT

Q2

Please comment on the Draft Environmental Assessment: Emergency Grazing and Haying Leases on Select FWP Wildlife Management Areas.

This is a bad idea and sets a bad precedent.... (2) thumbs down, I am opposed to EGHL on WMA's.

#164

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Friday, August 13, 2021 7:10:06 AM
Last Modified: Friday, August 13, 2021 7:11:12 AM
Time Spent: 00:01:05
IP Address: 216.187.131.101

Page 1

Q1

Please provide the following information:

Name: Kathy Nordahl
City/Town: Molt
State/Province: MT

Q2

Please comment on the Draft Environmental Assessment: Emergency Grazing and Haying Leases on Select FWP Wildlife Management Areas.

Great idea, A win for everyone.

#165

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Friday, August 13, 2021 7:59:38 AM
Last Modified: Friday, August 13, 2021 8:01:23 AM
Time Spent: 00:01:44
IP Address: 209.206.245.254

Page 1

Q1

Please provide the following information:

Name: **Mark Magill**
City/Town: **Whitefish**
State/Province: **MT**

Q2

Please comment on the Draft Environmental Assessment: Emergency Grazing and Haying Leases on Select FWP Wildlife Management Areas.

I think the grazing on wma lands is a horrible idea. The wildlife utilizing this land is a major source of financial and cultural wealth to montana and would be displaced and or die if they loose their already limited access.

Please consider other options like volunteer grazing on private lands.

#166

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Friday, August 13, 2021 9:41:39 AM
Last Modified: Friday, August 13, 2021 9:48:03 AM
Time Spent: 00:06:23
IP Address: 47.34.209.252

Page 1

Q1

Please provide the following information:

Name: Jens macAller
City/Town: Helena
State/Province: MT

Q2

Please comment on the Draft Environmental Assessment: Emergency Grazing and Haying Leases on Select FWP Wildlife Management Areas.

I urge land managers NOT to allow increased grazing and haying. Removing plants and plant matter worsens droughts by increasing evaporation of soil moisture. Grazing compacts already fragile soils increasing erosion. Grasses shade soils and provide vital habitat for insects, birds, and feeding grounds for big game. I AM AGAINST INCREASED GRAZING AND HAYING

#167

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Friday, August 13, 2021 10:13:16 AM
Last Modified: Friday, August 13, 2021 10:24:52 AM
Time Spent: 00:11:35
IP Address: 174.22.7.188

Page 1

Q1

Please provide the following information:

Name: Meg Sedgwick
City/Town: Whitefish Montana
State/Province: MT

Q2

Please comment on the Draft Environmental Assessment: Emergency Grazing and Haying Leases on Select FWP Wildlife Management Areas.

I am against leases in wildlife management areas. Those areas needs to be protected for wildlife as intended not grazing for those making a profit. There are more efficient ways to feed cattle without damaging habitat for so many other species.

#168

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Friday, August 13, 2021 9:43:50 AM
Last Modified: Friday, August 13, 2021 10:32:03 AM
Time Spent: 00:48:12
IP Address: 47.34.209.252

Page 1

Q1

Please provide the following information:

Name: **Emily Sedgwick**
City/Town: **Helena**
State/Province: **MT**

Q2

Please comment on the Draft Environmental Assessment: Emergency Grazing and Haying Leases on Select FWP Wildlife Management Areas.

I am AGAINST grazing and haying on WMA land.

I think the environmental damage done by livestock will be greater than the benefit. Livestock destroy waterways, increase erosion and turbidity of water. These areas are meant to be beneficial to wildlife and native plants. Allowing livestock and grazing on sections of these areas disturbs wildlife and decreases their food resources. By allowing livestock and machinery into these areas, we increase the risk of invasive plant growth as well on disturbed soil. Livestock are already allowed on large portions of public and wildlife lands; their movements are not controlled and they are not monitored by farmers. I do not feel that farmers need access to these specific wildlife areas as well, especially during a drought when wildlife are relying on these areas for shelter and food. Climate change is here to stay, we need to come up with new, bigger solutions for these problems without encroaching further on wildlife for commercial benefit. If farmers are desperate for more land access for livestock, then it is time to start asking for access to the large portions for private land in MT. Thank you.

#169

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Friday, August 13, 2021 11:17:14 AM
Last Modified: Friday, August 13, 2021 11:20:31 AM
Time Spent: 00:03:17
IP Address: 174.45.43.66

Page 1

Q1

Please provide the following information:

Name: Kristine Ellis
City/Town: Helena
State/Province: MT

Q2

Please comment on the Draft Environmental Assessment: Emergency Grazing and Haying Leases on Select FWP Wildlife Management Areas.

FWP's job is to protect and manage wildlife and its habitat. Turning these prime WMAs over to private interests does neither. Just say no.

#170

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Friday, August 13, 2021 11:32:12 AM
Last Modified: Friday, August 13, 2021 11:38:34 AM
Time Spent: 00:06:21
IP Address: 137.26.92.46

Page 1

Q1

Please provide the following information:

Name: Greg Price
City/Town: Missoula
State/Province: MT

Q2

Please comment on the Draft Environmental Assessment: Emergency Grazing and Haying Leases on Select FWP Wildlife Management Areas.

It is hard to understand how haying and cow grazing is good for wildlife, when the fact is that cow grazing and haying have ruined the native landscape by replacing it with grasses that are worthless to wildlife for most of the year. So, no, I do not think it is a good idea and the agency should not approve this. It is just more public resources subsidizing a private, profiteering enterprise. There should be no cows or grazing on any WMAs, or wilderness areas. Bring back native grasslands and cows can eat that too, and it is much more valuable to a whole host of wildlife. Thanks you for the opportunity to comment.

Greg Price

#171

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Friday, August 13, 2021 11:41:39 AM
Last Modified: Friday, August 13, 2021 11:46:23 AM
Time Spent: 00:04:44
IP Address: 72.255.177.46

Page 1

Q1

Please provide the following information:

Name: **Sen. Ryan Osmundson**
City/Town: **Buffalo**
State/Province: **MT**

Q2

Please comment on the Draft Environmental Assessment: Emergency Grazing and Haying Leases on Select FWP Wildlife Management Areas.

I think this is a great idea. Land needs to be managed and this will help keep the fire danger down. It is a great way to be a good neighbor! Thank you

#172

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Friday, August 13, 2021 11:15:10 AM
Last Modified: Friday, August 13, 2021 12:16:21 PM
Time Spent: 01:01:10
IP Address: 72.174.38.126

Page 1

Q1

Please provide the following information:

Name:	Dave Hagen
City/Town:	Helena
State/Province:	MT

Q2

Please comment on the Draft Environmental Assessment: Emergency Grazing and Haying Leases on Select FWP Wildlife Management Areas.

The rationale for the treatments proposed at each site simply does NOT match “the purposes and intended benefits of these properties” as described in ARM 12.9.510.

Also, the notion that in a year of extreme drought and consequently low seed production “seeded grasslands” would somehow “benefit from hoof action to improve forb abundance and fill in open spaces with seed trample” is a ridiculous one. I do not doubt that “forb abundance” would increase but it seems most likely that UNDESIRABLE forbs would benefit the most from cattle disturbance. Livestock are well-documented importers of noxious weeds and their presence and impact would simply make conditions more favorable for competitive undesirable plant species in future years.

#173

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Monday, August 09, 2021 5:00:31 PM
Last Modified: Friday, August 13, 2021 1:17:24 PM
Time Spent: Over a day
IP Address: 71.63.163.152

Page 1

Q1

Please provide the following information:

Name: Jane Marsh
City/Town: Eugene
State/Province: OR

Q2

Please comment on the Draft Environmental Assessment: Emergency Grazing and Haying Leases on Select FWP Wildlife Management Areas.

Dear MDFWP,

I believe Wildlife Management Areas should be managed for wildlife, not private livestock. I would support solutions that would not open up these lands to "emergency haying and grazing." We need to be managing for wildlife, not against it. We need to take steps forward, because any step backward will become harder and harder to overcome as we get deeper and deeper into our human-caused climate and biodiversity crisis.

It is clear that prolonged periods of drought – and wildfire - are in our future and in Montana's future. It will likely get much worse. We need to mitigate where we can. If we are to have wildlife in our ecosystems, we need to start "managing" like we mean it. It is counter-intuitive to me why the MDFWP would open up some (or any) wildlife management areas (WMA) to livestock grazing and haying. What is the purpose of a WMA? Is it to feed livestock? I think not. Furthermore, I know MDFWP proposes to keep any WMA currently being grazed or hayed open for that use, despite the drought's effects on wildlife. I don't agree with this action.

If there is any time when wildlife needs vegetation – especially the limited production that comes during drought - it is now. From what I read, it is estimated that during a severe drought, grass production is reduced up to 1/3 of what might otherwise occur on a site. To allocate this limited vegetation to private and non-native species as grazed forage is not right.

I hope the agency recalls that we, our country, our planet, are in a fast-moving biodiversity crisis. Wild places are collapsing all over the world, in our country, and in Montana too. I hope the agency recognizes the importance of biodiversity and devises policies to support it. Opening up WMAs to livestock is a surefire way to decrease biodiversity of animals and plants. This is not new news.

Ultimately I believe that private livestock need to graze on private land. Period.

I know that Montana Governor Gianforte is pushing MDFWP to make the forage available to private livestock. What makes this even worse is that MDFWP proposes to allow all grazing for free. This is not acceptable. Are these ranchers destitute? Why do taxpayers have to foot the bill for private livestock to graze? Cattle in particular, are not suited to the arid West. That is why only 2% of all cattle raised in the US are in the West. This is simply unacceptable. Furthermore, once livestock grazing and the haying operation cause the inevitable damage, the taxpayer will have to pay to attempt to restore these areas – that will take decades. Do you not see the destructive cycle?

I am so very tired of hearing hollow arguments about the "benefits of cattle for the land," how cattle and livestock are "restorative." It seems clear in your ESA that you recognize that most of the "benefits" you espouse for grazing and haying are disingenuous, while the impacts are significant. I also do not abide that you are a champion for wildlife. Another spurious statement is that you will "monitor" leases, and if any "significant" impacts occur, you will close the leases. Based on my experience watching these issues for several years, the chance that a lease is monitored is minimal; and even less that it will ever be revoked! And then it might be reinstated! Just recall Cliven Bundy and the Hammonds – notoriously bad actors who break the law and get away with it, courtesy of the governmental agencies "monitoring" their behavior. How many wannabe Bundys-and Hammonds are there? Who knows? But lack of agency oversight is a big problem.

Furthermore:

- The agency says that somehow grazing will improve the habitat for ungulates like elk. This is a strange assertion since elk in lands where livestock are excluded appear to do just well without the benefit of livestock grazing.

- The agency suggests that "it is likely wildlife species would avoid the presence of livestock and increased human activity" on leased lands. It doesn't give a reason. It is well documented that the mere presence of livestock causes the social displacement of native ungulates like elk.

- It is well known and documented (for decades) that livestock can spread weeds and make it easy for invasive species like cheatgrass (well known for decades) to take over. For some inexplicable reason, MDFWP intends to put livestock in areas with minor weed infestation. This is counter-intuitive! Why would the agency do this?

- You admit that haying operations could kill some birds; machinery can cause fires and spread weeds; and the loss of vegetation

Draft Environmental Assessment: Emergency Grazing and Haying Leases on Select FWP Wildlife Management Areas

could harm recreation such as hunting, which I, for one, don't think should be allowed, especially when wildlife is in such peril.

- While you note that "wildlife cover and winter forage would be reduced in areas leased in the fall for haying and grazing," you say it will be "short term." You then attempt to justify haying, suggesting that removing vegetation "may" invigorate plant cover. However, the MDFWP fails to note that plant vigor is less critical than hiding cover for most ground-nesting birds like pheasant and grouse. Not to mention native herbivores like elk and deer, not to mention prairie dogs, ground squirrels, grasshoppers and so forth are capable of reinvigorating vegetation as well.

I am afraid your thinking is short term. We need to be thinking long term. We need to be managing for wildlife, not against it. We need to take steps forward, because any step backward will become harder and harder to overcome as we get deeper and deeper into climate and biodiversity crisis.

One more comment: I do not live in the beautiful state of Montana, but I have visited many times. More importantly, I feel I have standing to comment to these proposals as a citizen stakeholder because the way our ecosystems ("the land" - soils, watersheds, animals, plants - all life) are managed affects all of us in the country, and particularly in the West. I care deeply about these issues.

Thank you for your consideration.

#174

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Page 1

Q1

Please provide the following information:

Name: Jocelyn Leroux
City/Town: MISSOULA
State/Province: MT

Q2

Please comment on the Draft Environmental Assessment: Emergency Grazing and Haying Leases on Select FWP Wildlife Management Areas.

August 13, 2021

Rick Northrup
Montana Fish, Wildlife and Parks
PO Box 200701
Helena, MT 59620

Submitted electronically via: <https://fwp.mt.gov/public-notices/news/2021/jul/0730-emergency-grazing-and-haying-leases-on-select-fwp-wildlife-management-areas-draft-environmental-assessment>

Dear Mr. Northrup,

Thank you for the opportunity to comment on the Emergency Grazing and Haying Leases on Select FWP Wildlife Management Areas Draft Environmental Assessment. Please accept these comments on behalf of Western Watersheds Project (WWP) and our 12,000 members and supporters. Founded in 1993, WWP has field offices in Montana, Idaho, Wyoming, Arizona, Utah, Oregon, Nevada and California. WWP works to influence and improve public lands management throughout the West with a specific emphasis on the protection and preservation of western watersheds and wildlife.

We urge Montana Fish, Wildlife, and Parks (MFWP) to keep all Wildlife Management Areas (WMAs) in the state closed to emergency livestock grazing and haying operations. The drought conditions that are causing MFWP to consider allowing emergency grazing and haying on the WMAs are also causing stress for native wildlife⁽¹⁾. We urge you to maintain these areas that have been set aside for wildlife as wildlife habitat, rather than give them away for free to livestock producers.

Livestock Grazing Impacts on Vegetation, Wildlife, and Riparian Areas

Livestock grazing has damaging impacts on vegetation, riparian areas, and wildlife even in the best conditions. However, with 98.7 percent of the state in severe to exceptional drought⁽²⁾, these impacts will only be exacerbated.

There is a substantial body of research that describes the detrimental impacts that livestock grazing has on vegetation with a few select quotes included here:

- Livestock graze and trample native plants which clears vegetation and destroys soil crusts; all contributing to weed invasion. This prepares weed seedbeds through hoof action. Additionally, livestock transport and disperse seeds on their coats and through their digestive tracks. ⁽³⁾
- In central Washington, grazing was responsible for changing the physical structure of ponderosa pine forest from an open, park-like tree overstory with dense grass cover to a community characterized by dense pine reproduction and lack of grasses. ⁽⁴⁾
- The Oregon-Washington Interagency Wildlife Committee, composed of biologists from several government agencies, concluded that grazing is the most important factor in degrading wildlife and fisheries habitat throughout the 11 western states. Likewise, ecologists in Montana suggested that livestock grazing is the major cause of habitat disturbance in most western riparian communities. ⁽⁵⁾
- Grazing has reduced the density and biomass of many plant and animal species, reduced biodiversity, aided the spread of exotic species, interrupted ecological succession, impeded the cycling of the most important limiting nutrient (nitrogen), changed habitat structure, disturbed community organization, and has been the most severe impact on one of the biologically richest habitats in the region. ⁽⁶⁾

Fleischner summarized the ecological costs of livestock grazing as: ⁽⁷⁾

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- Alteration of species composition of communities, including decreases in density and biomass of individual species, reduction of species richness, and changing community organization.
- Disruption of ecosystem functioning, including interference in nutrient cycling and ecological succession.
- Alteration of ecosystem structure, including changing vegetation stratification, contributing to soil erosion, and decreasing availability of water to biotic communities.

In addition to the direct impacts to vegetation and soils are the impacts to native wildlife species. It is well understood that livestock significantly displace certain native ungulates(8). Research has found that some deer species are known to avoid cattle(9). Additional research has found that elk and deer densities can decline by as much as 92 percent in response to the introduction of livestock(10). However, the EA claims on numerous occasions(11) that the proposed “treatments” will benefit deer and elk habitat. This is not supported by any evidence and is in fact disputed in many studies.

A southwestern Montana study found that, “elk generally avoided pastures being grazed, making relatively greater use of rested pastures and grazed pastures before and after grazing. Elk also used steeper slopes than cattle, apparently as a response to the presence of cattle. Elk avoided meadow sites heavily used by cattle during the previous year during the early summer. Elk were rarely observed in close proximity to cattle(12).” All of this describes social displacement of elk by cattle, yet is ignored in the EA.

Elk can be found on almost all of the WMAs that are proposed for leasing and so this social displacement must be taken seriously. In fact, even the admission in the EA that, “for areas receiving proposed treatments, as a general rule there are considerable areas that wouldn’t receive any treatment to retain effective wildlife habitats, consistent with the purposes of these properties(13),” would imply that the areas available for haying and grazing will not retain effective wildlife habitats and will therefore not be consistent with the purposes of the WMAs. This must be examined in further detail prior to giving away any leases that will negatively impact wildlife.

Along with forage competition and social displacement, the fencing required for livestock grazing can have serious impacts on various wildlife species. Yet, the EA does not disclose the extent to which fencing will be used. The use of temporary electric fencing is mentioned briefly as something leasees will be required to maintain(14), something that may temporarily impact wildlife movements(15), and as a fire hazard(16). Considering the extreme fire danger present throughout the state this year, it is alarming that MFWP does not spend more time considering this possible impact of electric fencing. Beyond being a potential fire hazard, fences are known to have numerous direct and indirect impacts on various wildlife species which must be taken into consideration, particularly in the Fleecer Mountain, Smith River, Dodson Dam, Hinsdale, and Sleeping Buffalo WMAs that contain occupied Greater Sage Grouse habitat. It is well understood that fencing has negative impacts on sage-grouse with many recent studies examining these impacts. Fencing poses a risk to sage-grouse by providing perches and corridors for predators(17), and pose direct mortality threats due to collisions(18).

Additional indirect impacts of fences include, “heightened stress of negotiating fences, obstructed movements, habitat loss and fragmentation(19).” Animals can experience extreme stress from “search[ing] frantically for a place to cross by pacing up and down the fence, or negotiat[ing] multiple fences on a landscape(20).” Simply claiming that these impacts will be temporary does not reduce the fact that this stress can cause “increased energy expenditure, higher mortality rates, and decreased overall fitness of individuals(21).” In short, the impacts of fencing on the wildlife accustomed to using the WMAs cannot be ignored or downplayed.

Livestock grazing on several of these WMAs also has the potential to impact local sage grouse populations, through vegetative removal. Sage grouse rely on sufficient grass and shrub cover for food and nesting respectively through the winter. Successful nests “were best predicted by residual grass cover and height(22).” By letting cattle graze in sage grouse habitat during a drought year where there has been less grass production, MFWP is increasing the risk that the sagebrush and grass cover required by sage grouse will be diminished, increasing the likelihood of nest failure.

Livestock grazing also has significant impacts on riparian areas, which, due to livestock’s propensity for the cooler temperatures, shade, and abundant food present in close proximity to a water source, tend to experience the greatest and most concentrated impacts. Riparian ecosystems only account for approximately 2 percent of the West’s total land area, yet they provide habitat for close to one-third of the plant species. These riparian ecosystems are disproportionately important to overall ecosystem health and function because of the heavy reliance on riparian areas by plants and animals alike. In fact, “[w]estern riparian zones are the most productive habitats in North America (Johnson et al. 1977), providing essential wildlife habitat for breeding, wintering, and migration(23).”

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Fleischner concluded that, “[l]ivestock grazing is one of the principal factors contributing to the decline of native trout in the West. Cattle activities especially deleterious to fish are the removal of vegetative cover and the trampling of over-hanging streambanks(24).” This is of particular concern on WMAs that propose emergency grazing and/or haying leases along the banks of trout streams. For example, the proposed leases on the Kootenai Falls WMA border the Kootenai River which has westslope cutthroat trout and threatened bull trout. Bull trout are also found in the Stillwater River, which borders a proposed lease in the Ray Kuhn WMA. Norton Creek, which runs through a proposed lease on the Fleecer Mountain WMA contains genetically unaltered westslope cutthroat trout. MFWP must take this into consideration. With widespread drought and high temperatures this year, many rivers have been closed to fishing to protect these same species that will then suffer damage from livestock grazing.

The Emergency Haying and Grazing EA proposes allowing haying and grazing to occur on 330 acres of wetlands and riparian areas(25). However, due to the vague nature of the EA, it is hard to understand the specific and localized impacts of this grazing. Table 1 in the EA gives a brief overview of “Treatment Information” for each WMA, and riparian grazing is only mentioned for one WMA, Blacktail(26). Is it accurate that riparian grazing will only happen on this one WMA? What will the impacts be to specific species in this location from this grazing? If there is riparian grazing in additional WMAs why is this not disclosed or discussed? There are 14 WMAs proposed for grazing and haying across the state in a variety of different ecosystems, a nineteen-page document cannot accurately assess all of these different impacts.

The False Claim That Haying and Grazing Can Be Beneficial To Wildlife

Suggesting that livestock grazing can provide beneficial impacts to vegetation is unproven and wishful thinking. When plants regrow post grazing, the EA claims that this provides excellent forage and habitat for native ungulates. However, what is most likely happening during this post-grazing regrowth is a defense mechanism that allows plants to regenerate enough surface area for photosynthesis. This compensation for aboveground biomass is frequently at the expense of belowground tissue(27). If there is not adequate recovery, the plants can die(28). In fact;

“[c]onsumption of plant tissues by herbivores reduces the amount of green photosynthetic tissue that produces the sugars and starches that plants require for survival and growth. Consumption of plant tissues also reduces plant height, making grazed plants more likely to be shaded by their ungrazed neighbors. Finally, plant consumption reduces the number of flowering stalks, seeds, and rhizomes, which are necessary for plant reproduction, and reduces the length and mass of the root system, which is required for water and nutrient absorption(29).”

The EA's claim that allowing grazing and haying operations on portions of these WMAs will increase herbaceous plant cover, forage and cover value, invigorate vegetation, and improve forb abundance(30) among other things is unsubstantiated. It is disingenuous for MFWP to claim these benefits with no evidence to support it. Researchers have actually asserted the opposite and stated that, “bunchgrasses in arid environments are more likely to die from the removal of their photosynthetic and other living tissues by grazers, or from desiccation, drought, or freezing if their standing dead tissues are removed(31).” This is particularly relevant in this case, because the EA claims that livestock will help remove “excess” grass. Rather than reinvigorate the vegetation as the EA claims, this will leave these grasses vulnerable to death from drought and/or freezing. Belsky also noted that she “could find no published examples of native grasslands that deteriorated in terms of total plant cover, biodiversity, soil stability, water infiltration, or soil fertility due to “overrest(32).” If MFWP has such publications they should be shared with the EA to support the claim that these “idled” areas are in need of a grazing treatment. Otherwise, MFWP should leave these areas for wildlife habitat as they are intended.

Cumulative Impacts of Drought and Opening Additional Areas in the State Meant for Wildlife to Grazing and Haying

Drought causes widespread impacts to water availability, soil moisture, vegetation changes, wildlife habitat, plant physiology, as well as plant growth, abundance, and productivity. The latest IPCC report predicts with high confidence that drought will increase in Western North America(33). This must be taken into consideration prior to authorizing emergency haying and grazing on WMAs, because even one time use can cause damage that can take years to reverse, particularly if drought in the region continues as is predicted.

Soil moisture declines in the summer as significant moisture is lost to evaporation, and it can take numerous low intensity rain events for moisture to penetrate into the soil again. When soil moisture is lacking, vegetative growth is inhibited. Researchers have found a

Draft Environmental Assessment: Emergency Grazing and Haying Leases on Select FWP Wildlife Management Areas

for moisture to penetrate into the soil again. When soil moisture is lacking, vegetative growth is inhibited. Researchers have found a direct correlation between soil moisture and aboveground net primary production, showing that in drought years, vegetative growth decreases accordingly(34). The duration and severity of drought can change how plants respond, but research has shown that one of the first drought adaptations that grasses employ is reduced leaf growth, followed by reduced root growth(35). According to the U.S. Drought Monitor, places experiencing “severe drought” begin to see nonexistent subsoil moisture(36). Without subsoil moisture, plants will struggle, meaning a lack of cover and forage for various bird and other wildlife species likely already exists prior to further removal of vegetation associated with haying and grazing. While the drought undoubtedly impacts livestock producers throughout the state, it is important that MFWP keep in mind the primary purpose of WMAs, “providing effective wildlife habitat(37).”

The drought impacts are felt beyond livestock producers, and thus MFWP should manage their lands to best support wildlife. Livestock grazing will only exacerbate the issues that have been caused by drought this year, potentially having significant impacts on fish and wildlife populations that rely on WMAs for habitat. Further, MFWP should take a look at the cumulative impacts of wildlife lands being opened to livestock grazing across the state. In July, Governor Gianforte urged US Department of Agriculture Secretary Tom Vilsack to open up all of Montana’s Conservation Reserve Program (CRP) acres to emergency haying and grazing. CRP is a land conservation program that pays landowners to remove land from agricultural production and plant native species to enhance water retention, soil stability, and wildlife habitat. Also in July, Montana Senator Steve Daines and Representative Matt Rosendale asked Secretary of the Interior Deb Haaland to allow emergency livestock grazing on the Charles M. Russell National Wildlife Refuge due to drought conditions.

This trend of prioritizing private profits over wildlife in Montana is concerning, especially considering the economic benefit of wildlife from hunting, fishing, and wildlife viewing. It is also concerning that MFWP plans to give these leases away for free. This proposal is incompatible with the Habitat Montana policies because allowing haying and grazing in the midst of a historic drought year cannot be considered “habitat-friendly agriculture.” Montana wildlife deserve better than to have their habitat given away to private industry.

MFWP admits that some haying operations will reduce cover and forage and may kill birds. It also admits that livestock damage riparian areas and may spread weeds. These impacts cannot be ignored simply because this is a “one-time use.” Such impacts in an incredibly dry year will have lasting consequences, including setting a precedent to allow emergency haying and grazing on WMAs again in the future.

We urge you to not approve this proposal as the ecological costs are great and the benefits are few. Montana must preserve some spaces for wildlife, or risk destroying one of the things that makes this state so great. Thank you for the opportunity to comment. Please don’t hesitate to reach out at the information below if you have any questions.

Sincerely,

Jocelyn Leroux
Washington and Montana Director
Western Watersheds Project
P.O. Box 8837
Missoula, MT 59807
(406) 960-4164
jocelyn@westernwatersheds.org

(1)This will be described in detail below, but it is notable that MFWP sent out a press release on August 3, noting that hot and dry conditions require special considerations for wildlife because of how drought can impact various species of wildlife.

<https://fwp.mt.gov/homepage/news/2021/aug/0803-dry-hot-conditions-call-for-special-consideration-when-living-with-wildlife>

(2) Found at <https://droughtmonitor.unl.edu/CurrentMap/StateDroughtMonitor.aspx?MT>. Last visited August 13, 2021.

(3)Belsky, A. J., & Gelbard, J. L. (2000). Livestock grazing and weed invasions in the arid West. Portland: Oregon Natural Desert Association.

(4)Fleischner, T. L. (1994). Ecological costs of livestock grazing in western North America. Conservation biology, 8(3), 629-644.

(5)Id. citing: Oregon-Washington Interagency Wildlife Committee. 1979. Managing riparian ecosystems for fish and wildlife in eastern Oregon and eastern Washington. Oregon-Washington Interagency Wildlife Committee, available from Washington State Library, Olympia, Washington; Mosconi, S. L., and R L. Hutto. 1982. The effect of grazing on the land birds of a western Montana riparian

Draft Environmental Assessment: Emergency Grazing and Haying Leases on Select FWP Wildlife Management Areas

habitat. Pages 221-233 in L. Nelson, J. M. Peek, and P. D. Dalke, editors. Proceedings of the wildlife-livestock relationships symposium. U.S. Forest, Wildlife, and Range Experiment Station, University of Idaho, Moscow, Idaho.

(6)Id.

(7)Id.

(8)Wallace, Mark C. and Paul R. Krausman. 1987. Elk, Mule Deer, and Cattle Habitats in Central Arizona. *Journal of Range Management*, Vol. 40, No. 1 (Jan., 1987), pp. 80-83. Society for Range Management. Stable URL: <http://www.jstor.org/stable/3899367>.

(9)Krämer, August. 1973. Interspecific Behavior and Dispersion of Two Sympatric Deer Species *The Journal of Wildlife Management*, Vol. 37, No. 3 (Jul., 1973), pp. 288-300. Wiley on behalf of the Wildlife Society Stable URL: <http://www.jstor.org/stable/3800119>.

(10)Clegg, Kenneth, "Density and Feeding Habits of Elk and Deer in Relation to Livestock Disturbance." 1994. All Graduate Theses and Dissertations. 969. <https://digitalcommons.usu.edu/etd/969>.

(11)EA at 17: These sites have been idled for a number of years but would benefit from a grazing treatment to improve forage production and invigorate forbs, benefiting deer, elk, and forest grouse, one-time treatment would rejuvenate cover, mostly on elk spring transition habitat, a grazing treatment would reduce built up senescent vegetation and invigorate growth, enhancing elk forage

(12)Gniadek, Steve; 1987. Elk and cattle relationships on summer range in southwestern Montana. Master's Thesis U of Montana.

(13)EA at 16.

(14)EA at 16.

(15)EA at 28.

(16)EA at 28.

(17)Braun, C. E. (1998). Sage grouse declines in western North America: what are the problems. *Proceedings Western Association of Fish and Wildlife Agencies*, Jackson, Wyoming, USA.

(18)Boyd, C. S., Beck, J. L., & Tanaka, J. A. (2014). Livestock grazing and sage-grouse habitat: impacts and opportunities. *Journal of Rangeland Applications*, 1, 58-77.

(19)Jakes, A. F., Jones, P. F., Paige, L. C., Seidler, R. G., & Huijser, M. P. (2018). A fence runs through it: A call for greater attention to the influence of fences on wildlife and ecosystems. *Biological Conservation*, 227, 310-318.

(20)Id.

(21)Id.

(22)Boyd, C. S., Beck, J. L., & Tanaka, J. A. (2014). Livestock grazing and sage-grouse habitat: impacts and opportunities. *Journal of Rangeland Applications*, 1, 58-77.

(23)Fleischner, T. L. (1994). Ecological costs of livestock grazing in western North America. *Conservation biology*, 8(3), 629-644.

(24)Id. Citing: Behnke, R.J., and M. Zarn. 1976. Biology and management of threatened and endangered western trouts. General Technical Report RM-2B: U.S. Forest Service, Rocky Mountain Forest and Range Experiment Station, Fort Collins, Colorado.

(25)EA at 14.

(26)EA at 17.

(27)PAINTER, E. L.. 1996. EFFECTS OF HERBIVORY (GRAZING/BROWSING) ON PLANTS AND VEGETATION. CALIFORNIA NATIVE PLANT SOCIETY, SACRAMENTO CA.

(28)Belsky, Joy A., et al., 1993. Overcompensation by plants: herbivore optimization or red herring? *Evolutionary Ecology*, 1993, 7, 109-121.

(29)Belsky, Joy. A, n.d. Holistic Management: Some Ecological Concerns.

(30)EA at 17.

(31)Belsky, Joy. A, n.d. Holistic Management: Some Ecological Concerns.

(32)Id.

(33)See IPCC, 2021: Climate Change 2021: The Physical Science Basis. Contribution of Working Group I to the Sixth Assessment Report of the Intergovernmental Panel on Climate Change [Masson-Delmotte, V., P. Zhai, A. Pirani, S. L. Connors, C. Péan, S. Berger, N. Caud, Y. Chen, L. Goldfarb, M. I. Gomis, M. Huang, K. Leitzell, E. Lonnoy, J. B. R. Matthews, T. K. Maycock, T. Waterfield, O. Yelekçi, R. Yu and B. Zhou (eds.)]. Cambridge University Press. In Press. And North and Central America Regional Fact Sheet.

(34)Vose, J., Clark, J. S., Luce, C., & Patel-Weyand, T. (2016). Effects of drought on forests and rangelands in the United States: a comprehensive science synthesis. Gen. Tech. Rep. WO-93b. Washington, DC: US Department of Agriculture, Forest Service, Washington Office, 93, 1-289.

(35)Id.

(36)Found at <https://droughtmonitor.unl.edu/CurrentMap/StateDroughtMonitor.aspx?MT>. Last visited August 13, 2021.

(37)EA at 16.

#175

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Page 1

Q1

Please provide the following information:

Name: **Jess Wagner**
City/Town: **Lewistown**
State/Province: **MT**

Q2

Please comment on the Draft Environmental Assessment: Emergency Grazing and Haying Leases on Select FWP Wildlife Management Areas.

I would not like to see grazing and haying on WMA's this fall. Most of our public lands have already been grazed hard this year and WMA's are the few places where wildlife doesn't have to compete with cattle for feed. Haying and grazing on WMA's should be a last resort. My fear is that it would become a common practice in the future if we allow it to happen this year.

#176

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Page 1

Q1

Please provide the following information:

Name: Stacey Barta
City/Town: Bozeman
State/Province: MT

Q2

Please comment on the Draft Environmental Assessment: Emergency Grazing and Haying Leases on Select FWP Wildlife Management Areas.

Please consider Alternative B, these areas need vegetation management, and haying and grazing serves 2 purposes. 1st it meets a need by livestock producers for forage, 2nd it improves habitat. These areas should also be considered for a permanent haying grazing in the future.

#177

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Page 1

Q1

Please provide the following information:

Name: Senator MIKE IANG
City/Town: Malta
State/Province: MT

Q2

Please comment on the Draft Environmental Assessment: Emergency Grazing and Haying Leases on Select FWP Wildlife Management Areas.

Drought is upon this state. Grazing and haying will reduce the material for fires. 67% of Montana is private land on which wildlife life depend on habitat. Farmers and ranchers need feed for their livestock and wildlife .Hatching and rearing of chick stage are past for the year. While the haying and grazing will not be done at a time of high feed value, it will still provide forage benefits. Let agriculture hay and or graze the proposed WMA's in Montana.

#178

COMPLETE

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Time Spent: 00:05:42
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Page 1

Q1

Please provide the following information:

Name: Dan Salomon
City/Town: Ronan
State/Province: MT

Q2

Please comment on the Draft Environmental Assessment: Emergency Grazing and Haying Leases on Select FWP Wildlife Management Areas.

This is a very good idea. By allowing grazing and haying in the areas shown in Ninepipes reserve, wildlife habitat and vegetation will be invigorated. Ranchers will be allow to find some good feed which is in high demand.

#179

COMPLETE

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Page 1

Q1

Please provide the following information:

Name:	Rep. Steve Gunderson HD 1
City/Town:	Libby
State/Province:	MT

Q2

Please comment on the Draft Environmental Assessment: Emergency Grazing and Haying Leases on Select FWP Wildlife Management Areas.

Opening emergency grazing and haying on select FWP Wildlife Management Areas is a no brainer! We are in the middle of a severe drought across the State and with the additional severe impacts of wildfire. These areas will be a Godsend to help out many people in need across the state. The severe conditions we find ourselves in far outweigh any minor environmental impacts that may be incurred. Please open these areas up to allow for emergency grazing and haying.

Respectfully
Representative Steve Gunderson
Montana House District 1
Libby, Troy and the Bull River Valley
