

## Summary of Comments on Draft Alternatives (Fall 2008)

Below is a summary of the comments heard at seven public meetings held across Montana in September 2008 and from the written comments that were accepted early August-October 31, 2008. The comments are organized first by topic areas and then by alternatives. The Service values and considers all comments during the planning process. The next official public comment period will occur when the Draft Comprehensive Conservation Plan and Environmental Impact Statement is published in the *Federal Register*, anticipated to occur in Spring 2010.

### *Common Topics (not in order of significance)*

**Terms** that people questioned and that warrant clarification:

- Prescriptive grazing
- Passive management approach
- Patch burning
- Ecological processes
- Extirpated
- Biological Integrity
- Sentinel species

### **Wildlife and Habitat**

- Concerns about prairie dog management (both support and opposition to prairie dogs).
- Support for weed prevention efforts and more aggressive control.
- Concerns about the transportation of weeds by animals, people and vehicles.
- Propose greater coordination between the Service and other agencies to manage wildlife populations.
- Question management of sharp-tail grouse and pronghorn since they are in the refuge purpose.
- Clarification needed on what is meant by “enhanced and improved habitat” and “restoring biological diversity” and “ecological processes”.
- Support for controlling predators on the refuge.
- Support for predators on the refuge.
- Question whether refuge is a big enough area for the “restoration of ecological processes”.
- Concern about restoring to prehistoric pattern when context (i.e. habitat, economy) has changed. Cautioned importance of acknowledging today’s context.
- Concerns about the refuge monitoring process.
- Support for grazing in riparian areas.
- Opposition to grazing in riparian areas.
- Support for removing interior fencing as fences restrict animal movement and fragment habitat.
- Opposition to removing interior fencing. Fencing makes for good neighbors and keeps wildlife on the refuge and off private lands. Facilitates effective livestock grazing.
- Refuge has been recognized as an Important Bird Area and program is global. Service needs to adopt management policies that protect important habitats for birds. Need to develop targets for sage grouse. Burrowing owls and mountain plovers are closely associated with prairie dogs, and reintroductions should reflect habitat conditions that enhance these. Identify key parameters and strategies to improve habitat for declining grassland obligate birds.
- Concerns that there are too many elk and need to be managed with more hunting and working with Montana Fish, Wildlife and Parks.
- Research by Sam Fuhlendorf and Cecil Frost only represent a small portion of available science on rangeland resources and fire. Need fully functional interdisciplinary team.

### **Grazing**

- Opposition to the active reduction of grazing and the loss of animal unit months (AUMS).
- Opposition to using a prescriptive management approach.

- Concern with the effects of a reduction of grazing on the local economy.
- Suggestions that a passive management approach may be less expensive than active management.
- Support for the use of annual grazing to manage habitat and benefit wildlife.
- Support for an increase in annual grazing to reduce wildland fire and need for prescribed fire, use and reduce litter.
- Concerns about how a rancher could plan for the future under the “prescriptive grazing” management approach. Request that ample notification be given to ranchers about permit changes and that the Service works with ranchers in developing multi-year grazing plans.
- Concern about whether cattle will be permitted to graze in patch burn areas and the extent to which cattle will have to be transported when an area is slated to be burned.
- Suggestions that additional water development is needed in order to hold cattle in a particular grazing area.
- Concerned about Service knowledge of grazing management. Consider hiring a Rangeland Specialist.
- Support for using prescriptive grazing. Livestock grazing is a privilege not a right. Remind the Service what its mission is—wildlife conservation.
- Look at other examples where grazing has been used—Matador Ranch, Wall Creek Wildlife Management Area.
- Concerns about the use of livestock grazing or opposed to the use of livestock grazing. Concerns that the landscape has been overgrazed.
- Reevaluate the use of livestock grazing, recognizing the importance of wildlife and that wildlife conservation is the priority for the refuge and the National Wildlife Refuge System.
- Concerns that traditional grazing practices generally favor uniform grazing intensity across the landscape which results in homogeneous vegetation structure which reduces habitat diversity for grassland birds and other species.
- Support for using prescriptive grazing, particularly if grazed areas are not meeting wildlife and habitat objectives. Prescriptive grazing is a necessary course of action to bring the refuge into compliance with legal mandates.
- Use of livestock grazing can have adverse impacts, but if used properly, it can benefit wildlife.

### **Reintroductions**

- Opposition to bison reintroduction. Concerns about how a free roaming bison herd would be controlled on refuge. Also concerns about bison’s impact on the heavily foraged basin. Some proposed adding additional fencing if bison are introduced.
- Support for the reintroduction of bison including the additional hunting opportunities.
- Concern about bison control between the Service and state of Montana.
- Question the idea of the Service “maximizing” wildlife populations under Alternative B.
- Opposition toward wolves - “No way, no how.”
- Support for having a wolf management plan in order to be proactive in knowing how wolves would be managed if they showed up on the refuge.
- Support for regulated hunting of reintroduced species.
- Support for the consideration of reintroducing mountain lions and chukars and promoting wild turkey habitat.
- Concerns about reintroduced species spreading disease.
- Questions about how any reintroduction of bison or wolves would impact elk populations.
- Concerns about the economic impact to communities by replacing grazing cattle with bison.
- Support for bighorn sheep reintroductions both as a hunting opportunity and to complete reintroduction into their original range.
- Oppose bighorn sheep reintroduction due to concerns about diseases, etc.

### **Fire**

- Concern with how prescribed burning will affect sage grouse and sharp-tail grouse.
- Buffaloberry is a fire-adapted species that is important to many wildlife species including sharp-tail grouse.

- Although fire is a tool for enhancing habitat, feel that prescribed burning should be used with caution.
- Propose that grazing be used instead of prescribed fires. Opposed to prescribed fire. Cheatgrass follows fire.
- Recommend analyzing the economic difference between prescribed fire and prescribed grazing.
- Encourage Service to work with local communities to suppress fire. Worry about fire going onto private lands.
- Consider fire's effect on the refuge's carbon footprint as well as its affect on local economy.
- Encourage refuge to fight fire more aggressively. Desire more roads to fight fire.
- Support for prescribed fire and natural wildland fire policies.
- Concern using fire as a tool in light of climate change (longer, hotter summers)—is it safe to burn in these conditions?
- Concerns about fire because it takes 40-50 years for the trees to come back.
- Buffaloberry is important to a number of species. It is a fire-adapted species and requires fire to propagate. Important for sharp-tail grouse.
- Concerns about the ability of the Service to suppress fire due to the lack of roads. Let ranchers fight them.
- Need to put fire out at the roads.

#### **Riparian/Water Development**

- Concern about how to balance provision of water (for livestock) with plans to take out reservoirs in order to restore fish species in tributaries.
- Concern about Service restricting wildlife and livestock from riparian areas. Others support restoring riparian areas and streams to improve health and diversity of fish and aquatic populations.
- Support improvements and maintenance of water sources. Oppose capping of wells. Water rights are being taken away from ranchers that need them. Oppose acquisition of more water from any landowners.
- Concerns about grazing in riparian areas and effects on these fragile areas. Others support grazing in riparian areas and question the science the Service will use to assess the impacts and believe the Service is premature in developing alternatives without knowing this information.
- Service needs to map and identify streams that still exist, or are not currently in functional condition due to water quality, quantity, vegetative condition, poor aquatic health, and identify how CCP will return them to functional condition. Need to identify cumulative effects of stock watering ponds on stream flow, fish, and riparian condition.
- Each alternative should consider state regulations and TMDL (Total Maximum Daily Load) work, and other laws. None of these are mentioned in any alternative nor is any assessment or monitoring process identified. Use Proper Functioning Condition to assess riparian areas. Alternatives discuss restoration of water quality but no data is presented that establishes that water quality is an issue. More assessments need to be documented before alternatives are developed. Suggest bringing in the National Riparian Service Team to assess riparian conditions.

#### **Wilderness**

- Encourage Service to promote decisions on proposed wilderness.
- Concern about how the CCP will deal with private inholdings within wilderness.
- Support for consolidating and creating new wilderness and proposed looking at areas that are essentially functioning as wilderness and that are visited rarely. Support for the existing proposed wilderness areas. Suggestions for consolidating the wilderness areas around Beauchamp Creek and Garden Coulee if road 201 was rerouted or closed. Similar opportunity exists across the lake with the 3 areas near Timber Creek Bay if a trade for the inholding could be accomplished. Suggested looking at wilderness potential in the several sections of land forming the peninsula into Crooked Creek Bay.
- Concerns about the future of proposed wilderness.

- Questions about why the refuge needs wilderness at all or opposed to any new wilderness areas.
- Would like to see nonmotorized trail development within wilderness.

### **Public Use and Economic Uses**

- Would like to see more opportunities for multi-generational use of refuge (i.e. designated waterfowl, fishing areas and boat ramps).
- Concern about the lack of public facilities throughout refuge.
- Propose the creation of more passive recreation opportunities (i.e. wildlife observation) in conjunction with road system.
- Support for a huntable bison population.
- Support accessibility for all users and for the reopening of some roads.
- Propose that refuge adopt Service fishing policies, such as rules and regulations for fishing tournaments.
- Support for regulating commercial fishing on refuge.
- Opposition to regulating commercial fishing on the refuge.
- Propose the incorporation of outfitters may control public use, provide public services, and develop a possible ecotourism component.
- Concerns about jurisdiction overlap between refuge and law enforcement officers.
- Concerns about who receives and/or benefits from economic money acquired from hunting and recreation?
- Concerns about the refuge monitoring process.
- Encourage Service to listen to the public and accept recommendations.
- Opposition to limits on boat access or types of boats.
- Closing roads is good for hunters who desire a wilderness experience but not for outfitters.
- Support for biking opportunities and believe this hasn't been addressed under the alternatives.

### **Road Access**

- Opposition to the reduction of road stems.
- Support for the reduction of road stems and the 700-miles of refuge roads.
- Propose allowing increased hunting access (hunting retrieval) along seasonal roads for brief time periods.
- Prefer roads that make loops. (i.e. Timber Creek, Willow Creek).
- Support development of a multi-use trail system.
- Preference by some for all-season roads in exchange for seasonally-closed roads.
- Support for better trailheads and additional infrastructure.
- Concerns that the only place to launch a boat when it is wet is Kipp Recreation Area.
- Concerns that active public use (i.e. off-road recreation) will increase exponentially and adversely affect passive public use (i.e. birdwatching).
- Support for increased access.
- Consider the quality and quantity of roads accessible to seniors and persons with disabilities.
- Consider additional access for permittees for livestock management.
- Improve delineation of riding trails by adding signage.
- Suggestions that additional road access may help manage fire.
- Support for limiting road development and concerns about the 700-mile road network within the refuge.
- Use of GIS mapping and other mapping tools are available to aid in travel management planning that can result in better management of elk populations and achieving higher harvests.
- Concern that roads are hard to maintain, and government entities can't afford their road systems. Determine what arterial system is needed and call it good.

### **Adjacent Lands**

- Support for and opposition to acquisition of State lands on refuge.

- Support for permanent mineral withdrawal on refuge land.
- Opposition to any mineral withdrawals.

#### **Climate Change**

- Support for addressing climate change.
- Consider taking different approaches
- Don't see the science to address climate change

### ***Comments Organized By Alternatives***

#### **General Comments**

- ***Planning Process:*** Some encouraged the Service to listen to the public more and accept their recommendations. The Service should take their wildlife hat off. More opportunity should have been given in the public meetings for open testimony and recorded verbatim. The Service needs to form a Citizens Advisory Board. Still others liked the format of the meetings, the smaller group discussions, and praised the Service for the outreach efforts.
- ***Analysis:*** Some felt the Service hadn't provided any analysis, data, or science to propose or support any of the alternatives.
- ***Grazing:*** Some suggested that ranchers would need ample notification about permit changes and expressed concerns about the economic effects by limiting grazing permits.
- ***Climate Change:*** Many concerns were expressed about climate change and how the Service addresses it. Some suggested taking different approaches in the alternatives to addressing climate change. For example, Alternative B could present the most opportunity to radically change management, Alternative C could represent the least management latitude to adopt and Alternative D could represent the middle ground and management working with what they've got to address the results of climate change. Some support the Service's efforts to address climate change, but others wanted to know where the science is coming from to address climate change.
- ***Research:*** More opportunities for research should be considered and analyzed.
- ***Alternatives:*** Some expressed concern about the labeling of alternatives, specifically Public Use and Economic Emphasis vs. Ecological Processes Emphasis or Wildlife and Habitat Emphasis. Themes are not mutually exclusive. For example, studies have shown that managing public lands for well-being of wildlife and wilderness can lead to greater economic prosperity for the communities surround them. The public and media might have a different perception of the alternatives based on their labels. Labeling also seemed to imply that Service had a multiple-use mandate rather than a sole mandate to protect wildlife. The title for alternative C should be changed to Recreation Access and Grazing emphasis. Make it clear that Alt. D is not excluding positive economic impacts to the surround communities.
- ***Alternatives:*** Some felt the draft alternatives (A,B,C, D) all contain some good management directives and some bad management directives that are apparently included as a whole in the choices A,B,C,D. Some believed that the range of alternatives was adequate while others did not. Some opposed all the alternatives.
- ***Alternatives:*** Some felt there only needed to be one alternative that addressed sharp-tail grouse, pronghorn, and livestock grazing since they are listed in the original Executive Order (7509).
- ***Alternatives:*** Some felt each of the alternatives provides for a reduction in livestock grazing, and the Service should abandon all four alternatives.
- ***Alternatives:*** Some stated that the analysis hasn't been completed, and the Service had violated the Data Quality Act. Alternatives don't provide reviewers enough information to make informed comments. The Service hasn't fully assessed the 1985 Environmental Impact Statement and has jumped into draft alternatives without determining what needs to be changed and why.
- ***Alternatives:*** By ignoring livestock grazing as a purpose, the Service drafted the vision and goals and didn't include livestock grazing as a goal. Others disagreed stating that the original purpose protects pronghorn, sharp-tail grouse and other wildlife, and if there is anything left over, grazing can be allowed. Some reminded the Service that wildlife conservation is the priority for management on national wildlife refuges.

- **Alternatives:** Some felt alternatives C&D are not mutually exclusive and supported managing for diversity of species and diversity of access.
- **Alternatives:** Some opposed “hot season” grazing and grazing in riparian areas. Some oppose any reduction in internal fencing, while others believe it should be eliminated.
- **Minerals:** Some feel mineral development within the refuge should be aggressively pursued, but others would like to seek a permanent withdrawal for minerals on the refuge and want to see the cumulative impacts of mineral development analyzed.

#### Alternative A

- **General:** Some supported alternative A (no-action alternative) or key elements of it.
- **General:** Some felt alternative A allows for some multiple uses of renewable resources for the public and people that live near the refuge.

#### Alternative B

- **General:** Some felt that encouraging wildlife-dependent uses as in alternative D is not incompatible with alternative B.
- Some questioned whether managing large wildlife populations are compatible with maintaining wilderness. They questioned how pronghorn and sharp-tail grouse will be managed in this “wildlife alternative” since they are listed in the refuge purpose. Some questioned which species of migratory birds (game or nongame) would be managed for in Alternative B. Some suggested that “optimizing” is a better word over “maximizing” populations.
- **Grazing:** Many voiced opposition to actively reducing grazing, but others supported reducing livestock grazing. Many voiced concerns about the economic impact from reduced grazing permits.
- **Roads/Access:** Some opposed reducing road stems and desire increased hunter access for retrievals along seasonal roads for brief time periods.
- **Reintroductions/Bison:** Many voiced concerns about reintroducing bison and, in particular, controlling the herd, and suggested an increase in fencing to control wildlife. But others desire the consideration of reintroducing bison onto the landscape.
- **Hunting:** Many supported regulated hunting of reintroduced species (i.e. state registering for mountain lion hunts).
- **Fire:** Many proposed using grazing instead of prescribed fires. Fire may be recognized as a habitat enhancement, but should be used with caution.
- **Wilderness:** Some expressed support for the wilderness proposal of alternative B.
- **Elk:** Some suggested that elk are emphasized too heavily in the alternative and had concerns about the refuge becoming an elk factory and what may happen if the elk move outside the refuge. Need to collect more input on what is a tolerable elk population on refuge. Consider surveying the public and hunters.
- **Invasive species:** Some noted that alternative B is the most active in terms of weed control.

#### Alternative C

- **General:** Some noted that only Alternative C mentions using grazing to minimize fuel loads. Each alternative should contain a provision for grazing followed by work crews to reduce minimizing use of prescribed fire.
- **General:** Some support the goal of Alternative C to manage plant community that is a compromise between wildlife needs and livestock forage and find this to be a more balance way of managing habitat.
- **Public Use and Economic Emphasis:** Some had concerns about the “Economic Use” title and definition in Alternative C. They questioned whether maximizing use and access is the best use of the refuge. Some felt the title may be misleading. Some supported increased public use and encouraged development of trailheads and additional infrastructure. Others had concerns that active public use (i.e. off-road recreation) will increase exponentially affecting passive public use.

- (i.e. migratory birdwatching). There were concerns about who receives and/or benefits from economic money acquired from hunting and recreation. Some desired seeing public use and economic emphasis on separate alternatives. One person questioned, “if biological integrity is an ideal and you can get there via natural means, wouldn’t you lean toward that approach?”
- **Public Use:** A few supported more regulation of commercial fishing on refuge, but others were strongly opposed to more controls and felt the Service needed to work with other agencies and organizations. Some support more outfitter use on refuge, but others oppose it, and have concerns that outfitters would receive more consideration than the general public. Some desire more multi-generational public use opportunities. (i.e. designated waterfowl, fishing areas boat ramps). Many want increased road access for senior citizens, persons with disabilities, and the general public. A few desire better wild turkey habitat.
  - **Grazing:** Many opposed the “Prescriptive Management” approach. It’s not economical to move resources (i.e. fences, livestock). Grazing may bring money into the area in comparison to public use, and grazing has also been shown to increase elk numbers. Some suggested changing the language in the alternatives from “reduce annual grazing” to “modify” as sounding less negative.
  - **Roads/Access:** Some support reducing road stems and feeder roads if more all season roads could be created. Roads are valuable since they provide more opportunities for passive recreation such as wildlife observation. Additional signage on roads and trails would be helpful for visitors. Other support seasonal road closures and the better hunting opportunities like down on Slippery Ann and Rock Creek. Consider additional access for permittees, livestock management and bogs. Some proposed allowing daily retrievable periods along seasonally closed roads. Concerns about roads affecting wildlife distribution. Suggested that building more roads may affect wildlife management, create challenges when buying in-holdings and will increase access.
  - **Reintroductions:** Some desire the reintroduction of mountain lions and chukars. Others had concerns about reintroducing species and the spread of disease. Some worried about how neighboring BLM land and sheep ranches will be affected by sheep reintroductions. Still others wondered why Alternative C only has one reintroduced species.
  - **Trails:** Some support the creation of trails for a variety of non-motorized use (i.e. hiking, biking).
  - **Water Development:** Many support improvements and maintenance of water sources.
  - **Wilderness:** Some were concerned about modifying wilderness boundaries to accommodate more public access opportunities.
  - **Invasive species:** Some felt that not enough funds go to control under this alternative because more funds go to managing public uses.

#### Alternative D

- **General:** One person wondered “if biological integrity is an ideal and you can get there via natural means, wouldn’t you lean toward that approach?”
- **General:** Some felt it was difficult to understand the concept of managing for ecological processes and advised recognizing the limits of the size of the refuge. Is the refuge big enough to achieve this goal? Concerns about the implications of increased diversity and restoring to historic conditions.
- **General:** Some oppose restoration of extirpated species and questioned the legal mandate to do so. Others support restoration of extirpated species and believe the Service should pursue this.
- **Habitat:** Some had questions about it meant by a viable population of sentinel species and whether it is scientifically based. Others support the concept of managing for diversity of species, sustaining sentinel species, and having adequate habitat for a diversity of species. Identifying the sentinel species would be of help in understanding the alternative.
- **Wildlife:** Some had concerns with past and current management of the large elk population. Some support prairie dog and ferret restoration while others do not support prairie dogs.
- **Grazing:** If refuge moves to prescriptive grazing, it was suggested that the Service work with permittees to establish a five-year plan. Flexibility of permittees should not be expected. Some had concerns about the effects of prescriptive grazing on the ranchers’ current grazing practices. Many had concerns about the economic loss associated with loss of AUMs. Some support reducing fire

fuel through grazing. Many had questions on how patch burning and cattle grazing will co-exist. Will cattle be allowed on fire burns? How far will cattle have to be transported as a result of patch burning? Consider TNC's "Grass Bank" at Mattador Ranch as a model to provide a benefit to ranching communities and to benefit to refuge. Many others were opposed to "hot season" grazing or any grazing in riparian areas.

- **Roads/Access:** Some desire additional access is needed for game retrieval and accessibility for all users, but many others oppose opening additional access. Some Concerns about closing a numbered road and the fear of never reopening. Suggested that seasonal roads be converted to trails rather than closed. A few supported allowing more bicycle use, particular in game retrieval and allowing on closed roads. Some were concerned that ATV use wasn't addressed.
- **Reintroductions/Bison:** Concerns about the introduction of bison on elk populations. Concerns about the spread of disease from reintroduced species. Concerns about control a free roaming herd and how will this herd fit into a heavily foraged basin. Some opposed a free ranging bison herd while others supported a huntable bison population. Concern about how Service will manage the bison and cattle together. Concerns about the economic impact to communities by replacing grazing cattle with bison. Also some supported the reintroduction of chukars and others expressed concerns about re-introducing predator species.
- **Fire:** Service needs to consider fire's affect on carbon footprint and affect on local economy. Many want the Service to fight fire more aggressively. Others had concerns about adaptability built into prescriptive fire on the refuge with Alternative D. What other tools can be use? Mechanical?
- **Ecological Process Emphasis:** Some wondered about the size of refuge related to restoring ecological processes and questioned whether the refuge is big enough to achieve this goal. What are the implications of striving for increased diversity? There were concerns about restoring to historic conditions when the context (i.e. habitat, economy) has changed substantially since those times. Many support this as the proposed action alternative.
- **Water Development:** Some felt that there isn't enough water to hold cattle in a particular grazing area. Some were concerned about how to balance the provision of water in order to restore fish species in tributaries.
- **Public Use:** Propose that refuge adopt Service fishing policies, such as rules and regulations for fishing tournaments. Many voiced opposition to imposing limitations to river access without analyzing historic river use. Does refuge feel there is too much boat usage? How major of an issue is limiting boat sizes on the refuge? The Service shouldn't set arbitrary limits.
- **Riparian Habitat:** Some had concerns about Service restricting wildlife/livestock from riparian areas. Many others support restricting livestock from riparian areas.
- **Wilderness:** Some support consolidating and creating new wilderness. Some supported protecting areas that are essentially functioning as wilderness and that are visited rarely. Others cautioned the need to evaluate access issues prior to modifying proposed wilderness. Some desire the development of trails within wilderness for nonmotorized use. Other questioned why refuge needs wilderness. Wilderness areas tie management hands when they may need to manage that land (i.e. fire, etc.). Some had concerns that the Service is buying inholdings and expanding wilderness boundaries.
- **Weeds:** Many voiced concerns about weed management on a landscape scale.

