

May 6, 2018

Bernardo Garza and Vanessa Fields, Planning Team Leaders
U.S. Fish and Wildlife Service
Division of Refuge Planning
P.O. Box 25486
Denver, CO 80225-0486

Dear Planning Team Leaders:

For several years I have been an advocate of the National Bison Range (NBR). I have long supported a healthy, robust, and well-managed facility which fully supports the goals and mission of the National Wildlife Refuge System. I want to thank the U.S. Fish and Wildlife Service for this opportunity to comment on the scoping process during the formulation of the Comprehensive Conservation Plan (CCP).

The National Bison Range has been suffering from neglect, manpower shortages and proper funding over the last few years. Efforts to transfer the NBR lands and facility to the Confederated Salish and Kootenai Tribes a couple years ago have left a hollowed-out and broken park operated by a defeated, morale starved staff. The decision to retain the NBR within the National Wildlife Refuge System means that the USFWS must staff and fully fund the facility back to normal function. With that being said, science needs to be the driving force behind that proper management.

I fully support the goals as listed in the CCP. I support the draft vision as stated in the CCP. I would like to direct your attention to the statement below in the draft Vision.

“The units of the Complex safeguard these values and preserve connectivity across the landscape, forming continuity through time for future generations to treasure. Each unit is unique, and collectively they have, and will continue, to contribute to the Complex and the Refuge System.”

This statement needs to be constantly reaffirmed so that never again will these lands be considered as a bargaining chip for political action. These lands have a purpose and they fulfill a mission. They must always be held in the public trust.

There are five (5) alternatives listed in the CCP with Alternative A as the No Action alternative. Alternative C is entitled “Manage for Ecological Sustainability” and Alternative D is entitled “Species-Focused Management”. I support the combination

of these two with the preference of Alternative D. I think the strong consideration has to be for the protection of the resource, land, plant and animal. Corridor connectivity has got to be the new management goal on all of our public lands because the loss of wildlife habitat and climate change will be the 1-2 knock-out punch for the future of wildlife as we know it.

Time has run out on the traditional approaches of hoping sporadic habitat protection and multiple use management will be sufficient in the protection of wildlife. The encroachment of man on the landscape is in a whole new phase with the growing emphasis of public land accessibility and the feeling among user groups that every one has a right to that accessibility. When you add that with the advent of climate change, all mitigation and preservation measures must be undertaken and employed. And perhaps there is no better example of when measures need to be employed than when we discuss the importance of riparian areas. I believe this point cannot be overstated. These areas can be a source of protection as well as an oasis from a warmer, drier landscape. If the National Bison Range can even serve in a small capacity of being part of that connectivity, it should absolutely do so. After all, what better purpose and testimony is there than to realize that National Wildlife Refuges are part of the larger, wild landscape. They are not meant to be isolated, fenced-in wildlife parks; solely for the enjoyment of the public.

But part of that preservation mindset must also contain a sustainability concept. We must ensure that these lands and the wildlife contained therein will not be endangered of success. At some point it will be imperative that all entities, tribal and otherwise must understand that the land does not belong to the people, there is a higher calling that has set all this in motion. We must be good and proper stewards of the land. And since wildlife are part of that ecosystem, proper stewardship applies to them as well. Sustainability means that the lands and the habitat on those lands will be viable to fulfill their prescribed purpose well into the future. Climate change will stress those limits, making the application of sustainability even more critical.

In conclusion, I want to encourage the implementation of Alternate D with the combination of Alternate C. I don't want to diminish the other facets of the NBR such as the history and the public's education of the facility. But these are easy problems to solve compared to the more serious issues at hand. It should always come down to the basics as to why lands exist within National Wildlife Refuges System to begin with. It is for the preservation of the species on their homeland. In spite of the abundance of bison in State and National Parks, private herds, etc; bison, pure genetic bison should be on the endangered species lists as they do not

roam wild on the natural landscape. The bison within the NBR have the potential to resolve that problem if managed accordingly.

Thank you for this opportunity to comment.

OPTIONAL PUBLIC COMMENT FORM

Thank you for helping us plan...your comments are very important to the development of Comprehensive Conservation Plans (CCP) for all the units of the National Bison Range Complex. The purpose of this form is to provide an additional opportunity for you to express your ideas and provide input for the future management and activities of the National Bison Range Complex.

Please submit your comments by **May 25, 2018**. [Attach additional comments on a separate sheet of paper if needed.]

Draft Vision and Goals

Draft Management Alternatives

- Alternative C
- a) restoring natural processes in inconsistent with the broader elements.
 - b) bison maintained within the boundary cannot be fully restored to natural

Additional comments...

We appreciate you providing any issues, input, and ideas to be considered in planning for the Complex's Comprehensive Conservation Plans!

- 1) Bring events like saddle club ride back.
 - a) diaper nurses to mitigate needs



[EXTERNAL] Comments on the CCP and EIS for the National Bison Range

Mon, May 14, 2018 at 12:33 PM

To: Scoping_nbr@fws.gov

Thank you for the opportunity to comment. I had the opportunity to visit the Range last week, and inadvertently walked in on a presentation about the proposed management options.

I am a private citizen and not knowledgeable about environment at a technical level, but as a citizen I do think it worthwhile to express my preferences.

It strikes me that the National Bison Range is a really important part of the natural and historical history of the United States, and as such is worthy of strong support from the government. In deciding how that support should take form, I commend the planning experts at the Fish and Wildlife Service for having clearly and succinctly stated the alternative approaches. My comments are directed at trying to organize thinking about those alternatives, not necessarily to express a preference (though, based on my limited information, I do have one).

I think that while including Alternative A, No Action, is necessary for completeness, it does need to be recognized that this alternative will eventually lead to the end of the Range as a viable asset. If it is decided that the Range is to continue, Alternative A is unlikely to help.

Some version of Alternative B, Maximize Quality of Public Experience, is likely to be part of any final policy decision. An enterprise like the Range will not thrive without public support, and that support is best achieved through outreach and means of helping the public to appreciate the resource. I doubt that Alternative B should be the primary objective, though.

Alternatives C (Manage for Ecological Sustainability) and D (Species-focused Management) both strike me as two sides of the same idealist approach. It is hard to see how the bison species of interest can thrive without taking into account the overall ecological sustainability; and it is equally difficult to see how managing for overall ecological sustainability would not also take into account the interests of the bison herd. But neither of these alternatives will function without funding and support of the general public, and if/when implemented will require both moral and financial support as suggested in Alternative B.

I'm not sure that I've added a lot of value to the discussion, but hopefully I have at least framed the issues in a helpful way.

Thank you very much.



[EXTERNAL] My alternatives for CCP proposal at National Bison Range since your deadline is May 25, 2018 to submit comments.

Dear U.S. Fish and Wildlife Service, Conservation Heroes, Media, and Congressional Delegation:

Attached are my formal comments regarding the five draft management plan alternatives for the National Bison Range Complex and one of its national refuges at Lost Trail. I went to www.fws.gov/mountain-prairie/refuges/nbrc.php site to find out more about the planning process and to see the five proposed management and staffing plans for the National Bison Range Complex, so it is from that site and the website of www.fws.gov/refuge/national_bison_range/ and my experience with this issue since 1994 that I submit my comments. You are welcome to post my comments on your website and other public social media sites hosted by U.S. Fish and Wildlife Service, but I know you won't.

I urge all of my conservation heroes to review these websites and file their own comments before the May 25, 2018 deadline, and I hope they also file their comments with all of you and their own state U.S. Senators and U.S. Representatives because what happens at the National Bison Range impacts ALL national wildlife refuges. The National Bison Range is part of the entire National Wildlife Refuge System. I urge my conservation heroes to post my letter and their letters on their websites, FACEBOOKS, and other social media sites.

Congressional Delegation of Montana, I as a voter in Montana send my comments to you but note that other conservation heroes of mine will send their comments to THEIR Congressional Delegation and THEIR media because the issues of the National Bison Range are national and impact the management and staffing and funding of ALL federal lands.

Thank you and in the spirit of Theodore Roosevelt, Ding Darling, and the Flying Blue Goose, I say, the wildlife and its habitat cannot speak, so I must, and you must remember that you work for them and for us who hired you.

May 15, 2018

Dear Montana Congressional Delegation, U.S. Fish and Wildlife Service, Conservation Heroes, and Media,

I am writing my comments in 12-point type so no one has to squint to read them, and I am emailing them to everyone addressed in this letter. Yes, everything I say to you I say to the media and to my conservation heroes as well as my Montana Congressional Delegation. I urge my conservation heroes to send their comments to you, to me, and to THEIR Congressional Delegation no matter which state they live in because what happens at the National Bison Range impacts what happens at all other national wildlife refuges, as I have told you since 1994. **My CCP alternatives are colored in red on page 3 and 4.**

I have followed the tragedy at the National Bison Range Complex since 1994 when the Confederal Salish and Kootenai Tribes (CSKT), government of the Flathead Indian Reservation, announced that based upon the passage of the Indian Self Determination and Education Act of 1994 they wanted to be given all positions and tasks that are inherently federal to their workers and NOT through the Civil Service process. The CSKT tribal council also announced they wished to be GIVEN the National Bison Range land even though the federal government (i.e. the American taxpayers, including CSKT members who are American citizens and taxpayers), were paid twice at fair real estate market value for the land that is the 19,000-acre National Bison Range.

I have met with every U.S. Secretary of Interior since President Clinton's Administration through President Trump's Administration and several U.S. Presidents regarding the ongoing demands of the CSKT that impacts federal funding and staffing at one of the original national wildlife refuges begun by President Theodore Roosevelt and the U.S. Congress that served with him in the early 1900s.

The Federal Register repeatedly announced since 1994 that most national wildlife refuges and many famous and not so famous national parks, national monuments, and national recreation sites could fall under the Indian Self Determination and Education Act (ISDEA). This Act NEVER stated that the federal government or agencies were required to give federal land or federal jobs and federal positions/tasks to a federally recognized Indian government, but stated that these federal recognized Indian governments may work WITH federal agencies in cooperation with federal workers to enhance these designated national refuges, parks, national recreation sites, and national monuments.

The CSKT was encouraged to ignore those words by various political appointees and top-level U.S. Department and U.S. Fish and Wildlife Service leaders in Washington, D.C. to push for total take over of all or most of the inherently federal positions and the entire National Bison Range that violates many other federal laws set up to protect the management of the land masses within the National Wildlife Refuge System. The CSKT continues to pay highly compensated lobbyists and lawyers to interpret the ISDEA to "give" them inherently federal job tasks and positions, federal money, and overall federal land and management.

Federal workers filed suit, as did retired U.S. Fish and Wildlife Service employees, demanding that federal laws be upheld and federal workers be protected. Each time, the U.S. Fish and Wildlife Service lost in court, including a few weeks ago.

Excellent federal workers at all levels of employment within the U.S. Fish and Wildlife Service, starting at the National Bison Range and its complex, all the way up to the regional and national levels of the U.S. Fish and Wildlife Service and U.S. Department of Interior have been fired, demoted, replaced, and insulted because dedicated federal workers have courageously stood up to political appointees and entrenched bureaucrats that supported the position of the CSKT government officials wishing to dismantle the National Bison Range and its complex.

CSKT members and relatives of CSKT members who are also qualified federal workers have been displaced and insulted, as well as other federal workers. Federal workers have had their lives threatened and physically attacked over the years, as well as private citizens that stand up for other federal laws written and passed by the U.S. Congress to protect federal lands and especially the National Wildlife Refuge System. CSKT members and local residents living around the National Bison Range that wrote comments on the U.S. Fish and Wildlife Service website objecting to the CSKT government taking over jobs and positions at the National Bison Range and demanding that the CSKT be given this premiere national wildlife refuge had their identities revealed and emails and letters given to CSKT government officials. Those CSKT members and private citizens reported they were harassed for objecting to a CSKT takeover at the NBRC. If they were CSKT members with tribal rights their tribal rights were removed or threatened to be removed if they objected to the CSKT's positions. Children of CSKT members and other private citizens were harassed on playgrounds. Business owners were threatened for objecting to the CSKT government's position of take over.

I find it disturbing that during this latest "open house" process, some of the U.S. Fish and Wildlife Service employees claimed to know "nothing" about the history of the tragedy at the National Bison Range and acted as though they were told by someone at the regional level that if they spoke about anything to media or to the public that attended the "open house" meetings they would be punished or demoted as previous FWS employees have been in the past. The project leader at the NBRC since 2018, Jeff King, comes to mind.

I learned from the current rotating National Bison Range Complex project leader that at the present time this famous and popular national wildlife refuge has on its staff no full-time project leader and will only have rotating project leaders pulled from various national refuges around the nation sent to the National Bison Range every 90 days, so no top leader is at the National Bison Range Complex during the CCP process at all. Furthermore, by keeping the rotating project leader in the dark about what has gone on at the NBRC regarding the CSKT and overall tragedy at the National Bison Range, no one stationed at the NBRC can learn from previous mistakes or try to stop the problems.

Secondly, I learned that there is no assistant project leader as has always been a vital position at the National Bison Range Complex for a smooth operation of this popular national refuge.

Only one wildlife biologist is currently working at the NBR and one wildlife biologist is at Lost Trail National Wildlife Refuge. One refuge manager is assigned to Lost Trail and for a while he was also acting as the project leader for the whole complex although his experience and training was not for that coverage. There is no complex supervisory wildlife biologist as had always been the case before the CSKT started pushing to take over inherently federal positions.

Prior to the CSKT interference, the NBRC maintenance crew was a well-oiled team of 6 to 7 federal workers, CSKT members or not, but ALL qualified and experienced FEDERAL WORKERS. They were

selected for their experience through the Civil Service Commission process. Now there are only 3 maintenance workers and that well-oiled team is gone. The maintenance workers are vital for the proper care of all aspects of the buildings, water tanks, and all working aspects of all the national wildlife refuges in this National Bison Range Complex and also works with the administrators, wildlife biologists, and recreation specialists as part of the team. Without them, weed control, building maintenance, water production for wildlife, and many other vital aspects of care for this national wildlife refuge complex does not get done.

Prior to the CSKT's interference, the NBRC had a minimum of 2 federal law enforcement officers, plus the project leader and assistant project leader that also were authorized federal law enforcement officers. Right now, there is 1 federal law enforcement for the entire complex, as I understand it and the U.S. Fish and Wildlife Service no longer allows the project leader or assistant project leader to do law enforcement duties.

Bottomline, is that ALL five of the draft CCP staffing suggestions are dramatically inadequate to properly maintain one of America's most famous and most historical of the 550 national wildlife refuges in our 50 states and U.S. territories! The emphasis for any CCP must be on the enhancement of wildlife and wildlife habitat, NOT on the enhancement of human entertainment. Law enforcement and maintenance to assist wildlife biologists in their effort to help wildlife and its habitat are also vital to this national wildlife refuge and ANY national wildlife refuge, for that matter.

The lengthy printed materials I picked up at the poorly publicized "public" meetings at the May 10th Leon Hall "open house" in Charlo, Montana and the day-long "open house" at the National Bison Range visitor's center on May 11th had a thick packet of details about the staffing but no specific numbers of federal employees to be hired under each of the 5 CCP "management alternative concepts and actions" options so, I am stating that the MINIMUM the National Bison Range Complex, including Lost Trail National Wildlife Refuge, needs is 12 employees for the complex not including Lost Trail, and 4 employees for Lost Trail.

In other words, in case you don't catch on with this discussion, I do not support ANY of these options and recommend that another alternative just after Alternative A be included that includes my suggestions for proper staffing.

AT MINIMUM, the National Bison Range Complex needs 1 full time project leader with full federal law enforcement duties (bring back Jeff King, if he will return), 1 full time assistant project leader with full federal law enforcement duties, 1 refuge manager for Lost Trail, 1 recreation supervisor for the whole complex, including Lost Trail (Pat Jamieson had this position before she retired, and I don't know the exact title), 1 supervisory wildlife biologist for the entire complex including Lost Trail, 1 wildlife biologist for NBR, and 1 wildlife biologist for Lost Trail (since it is so isolated from the rest of the complex), 6 maintenance workers at NBRC that are INHERENTLY FEDERAL WORKERS, not contract workers from anywhere except Civil Service pool of workers, 1 maintenance worker at Lost Trail, 2 federal law enforcement officers for NBRC, 1 federal law enforcement officer for Lost Trail. For the entire NBRC, including Lost Trail NWR, I count a recommended 13 inherently federal workers assigned to NBRC, excluding Lost Trail, and 4 inherently federal workers assigned to Lost Trail NWR.

If that is not financially possible because of the financial devastation created from the decades of the legal and political push by the CSKT government officials to insist they should have complete control and ownership of the National Bison Range and other national refuges in the complex that has wasted money originally set aside for wildlife and its habitat, I recommend that 13 NBRC inherently federal positions be divided between the NBRC and Lost Trail NWR with a minimum of 1 refuge manager, 1 wildlife biologist, and 1 federal law enforcement officer being specifically assigned to Lost Trail and the

rest assigned to the rest of the complex with the complex project leader, assistant project leader, recreation supervisor and wildlife supervisor also responsible for duties to help Lost Trail NWR.

With such a short staff, naturally, all the inherently federal workers would help each other at the entire NBRC, including at Lost Trail NWR anyway as a TEAM.

Any other local, Indian, or regional government wishing to participate in anything at the National Bison Range can do it on a voluntary basis or on a project by project basis, managed by the appropriate federal worker, and a core of volunteers needs to be cultivated again to the levels of several years ago up to 70 volunteers under the leadership of Jeff King and Pat Jamison before they left the NBRC.

Nowhere in the alternatives listed during the “open houses” did I see a discussion of the importance of volunteers and that is a vital part of the work that is done at the NBRC and elsewhere in the National Wildlife Refuge System. I support urging local, Indian, and regional governments, local universities, national conservation and environmental organizations, and dedicated individuals that love the NBRC to volunteer their time to assist the paid federal workers assigned to the NBRC.

I must comment on the fact that the four “open houses” were poorly attended except for the last one at the visitor’s center of the National Bison Range’s complex headquarters at 58355 Bison Range Road in Charlo, Montana. I called into statewide radio shows and told thousands of Montana residents about the last “open house” at the visitor’s center on May 11 because the previous three “open houses” attracted 4 or 5 people due to VERY POOR publicity. I called all my media contacts and learned that none of them had received a press release about the public meetings but upon talking to NBRC staff, they were told press releases from the regional office in Denver were sent two weeks before the meeting. I sent a written notice to my media contacts in Missoula and the Mission Valley asking them to post the last meeting on their websites, which they did, but it was far too late for much response. No follow-up phone calls or guest appearances on local radio or television shows were done by any FWS staff at the regional or local level to further promote the open houses as I would have done if I were in charge of getting the word out.

My conclusion and that of the few other citizens that attended the Charlo meeting and the open house at the visitor’s center was that the regional office in Denver WANTED NO ONE TO ATTEND AND GIVE FEED BACK to them about the National Bison Range.

The last open house, thanks to my getting on two statewide radio shows and talking about the meetings, generated several large groups of people coming to the open house, but it was far too late to get a large number of people from the general public to submit comments or pick up the paperwork.

In the spirit of Theodore Roosevelt, Ding Darling, and the Flying Blue Goose, symbol of the National Wildlife Refuge System created by the artistic genius of Ding Darling, I say, the wildlife and its habitat cannot speak, so I must and so must all of you.



[EXTERNAL] Comments on CCP from Glacial Lake Missoula

Thu, May 17, 2018 at 8:30 AM

To: Scoping_nbr@fws.gov

These comments on the Comprehensive Conservation Plan for the National Bison Range Refuge Complex primarily concern the Bison Range portion of the Complex and are made on behalf of the Glacial Lake Missoula Chapter of the Ice Age Floods Institute.

It is difficult to select a preferred alternative to guide the future management of the area, as all the alternatives seem to be, not surprisingly, focused on wildlife, whereas the primary concern of our organization is the special underlying geology found on the range.

The entire bison range (except for the peaks above 4250') was covered by Glacial Lake Missoula multiple times during the ice age, leaving behind some important features of interest to scientists and the general populations. The Bison Range is in the midst of other features created by the same lake, which formed 40 or more times, draining when the ice dam on the Clark Fork River at the Idaho border would collapse periodically, sending massive amounts of water across eastern Washington and down the Columbia River, eventually dumping its load of rock and soil in the Pacific Ocean. A National Geologic Trail connecting impacted areas along this route has been authorized and is being developed (slowly) by the National Park Service, and nearby locations are included.

Our organization has been active in telling this story for years, and was involved in placing the high water mark signs and the interpretive sign at the summit of Red Sleep Mountain several years ago. As we work on better ways to tell our story, we realize that there are a couple of locations on the Range where signage could better inform visitors of the unusual features found here. We would also like to have interpretive displays, brochures, or other materials available at the visitor center. Our organization would expect to cover the costs associated with these projects but want to make sure they would be permitted uses under the management plan, and of course, that the range would continue to be open to the public to the same extent as at present.

There are also some unique features at the Nine Pipe NWR but we would not expect to have any signage at this location.

Anything we would propose for this site would be in keeping with management objectives for the wildlife and habitat and cultural resources, as we support the proposed draft vision and goals as currently outlined.

Thank you to FWS staff for helping us understand this process during the Open House at the Bison Range on May 11, 2018.



Scoping NBR, FW6 <scoping_nbr@fws.gov>

[EXTERNAL] Bison Range Conservation Plan

To: scoping_nbr@fws.gov

Thu, May 17, 2018 at 10:52 AM

Hello Vanessa

Although I am not an expert on Bison or the management of this great, iconic animal of the American west, I have a great interest in Bison. The National Range is a great tourist attraction as well as a good educational tool for the public. I am also a strong advocate that the SKC tribe manage the Range.

With this in mind I am in favor of Alternative E since it permits the Tribe an important voice in management of a most important species in theirs and our history. As this alternative states, it develops bison management goals in coordination with partners of SKC, other tribes as well the State of Montana and other entities. I am in favor of the consideration for bison to access areas that may be available on land adjacent to the Refuge lands. I also like that this alternative considers working collaboratively with partners to develop a conservation plan and incorporate lands outside USFWS properties so as to maximize habitat and landscape.

It seems to me, while other plans are good plans, the emphasis on A-E is an inclusive management of the Tribes which is, in my opinion, a must and past resistance is purely a strong racial bias against Native Americans.

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[EXTERNAL] Public comment on NBR CCP

Mon, May 21, 2018 at 11:05 PM

To: scoping_NBR@fws.gov

Dear Ms. Fields,

Thank you for accepting public comments on the National Bison Range Comprehensive Conservation Plan. My comments apply to the whole complex, so I am sending this to both you and Mr. Garza.

Based on the options you have drafted and described so far, I am in favor of Alternative C. I am strongly opposed to Alternative B, and I don't feel that Alternatives E or D are in the best interest of the complex and the ecosystems. Overall, I am encouraged to see my values already represented in these options and planning sketches.

To me, the most important role of the Fish and Wildlife Service is to ensure the health of the ecosystems it manages – from this primary role, all others can be served. Thus Alternative C is a no-brainer: manage for the health of the ecosystem.

Two key characteristics of a healthy ecosystem stand out to me as being represented in this alternative: native and connected. The native part applies to plants and fire regime. I am thrilled that you list “restore and sustain the original fire regime to the maximum extent possible” (page 12) as an option in many of the alternatives. I strongly believe that fire as a land management technique would benefit all of our lands and can be incorporated healthily.

Secondly, I see many opportunities and plans for collaboration and connectivity within Alternative C. I think an ecosystem must be connected to be healthy. And, building a healthy ecosystem, it makes sense to share the abundance with neighbors, via collaboration. For example, I am in support of bison grazing on adjacent CSKT lands, and of reasonable timber harvests being made by a local company in order to restore forest health.

This is part of why I am not in favor of Alternative E. While I think it would be wonderful for the tribes to have a major management role, I feel comfortable with the level of opportunities for collaboration that are available in Alternative C. Furthermore, I trust in the ability, experience, and knowledge that the USFWS brings to the role of caretaker for the complex. I think it would be easier and more efficient for all involved if the USFWS remained as primary caretaker, provided that many opportunities for collaboration are pursued and utilized.

Alternative D is appealing. However, I think that bolstering the overall ecosystem (Alternative C) will inevitably strengthen many species (goal of Alternative D). And I also suspect that in the creating of a sustainable ecosystem, we may find that certain species have to be focused on anyway (for example, a few more predators may keep the ungulates in check). Also, I don't feel that it is wise to manage for maximum carrying capacity – that is not necessarily healthy for the animals or ecosystem.

The complex is not a zoo. I don't think it's your job to give visitors easy satisfaction while neglecting the true health of the beings they came to see. That is why I am against Alternative B. However, I do feel that public education and outreach are fundamental so that visitors and locals can deepen their understanding of what is really going on in those landscapes. As the plans are described now, there are places in Alternative C and others where those goals can be met.

Thank you for taking my comments into consideration.

U.S. Fish and Wildlife Service
Vanessa Fields, Planning Team Leader, NBR
Division of Scientific Resources
922 Bootlegger Trail
Great Falls, Montana 59404

May 22, 2018

Ms. Fields and Mr. Garza,

The following comments have been prepared on the draft Vision, Goals, and Alternatives documents as described in the Planning Update entitled Draft Alternatives for Future Management, National Bison Range Complex (Complex), in part, to prepare a Comprehensive Conservation Plan (CCP) for the Complex headquartered in Moiese, Montana.

As a follow-up to my comments made in June of 2017, I've searched the Complex's planning website for the preparation of support documents, here-in referred to as pre-planning. I found no documents related to the National Bison Range's purposes for establishment or establishment authorities, or resource associated documents which layout a structured path of decision making for the drafting of specific goal statements that support purposes of refuge establishment. This is extremely disappointing because nearly 6 months of planning team effort has proceeded in lieu of pre-planning. The end result is a waste of time and energy with products being produced that are subjective, conceptual at best, meaningless to a manager, and fail to provide any useable guidance for managing the refuge over the next 15 years. Without the resource associated documents of pre-planning the CCP has no foundation from which the planning team can rationalize these draft goal statements and associated management direction alternatives with full transparency for endorsement by stakeholders and/or the public at large. The conundrum is where does one start with comments with such a poor start to the planning process. One thing that can be concluded is it takes a project leader and staffing of a refuge to complete a CCP as is stated in Service policy, and was recognized by a draft Environmental Assessment addressing an Annual Funding Agreement with the Confederated Salish and Kootenai Tribes. Under the "No Action" alternative, that document stated, "...our program leaders (in reference to refuge personnel) and their staff would plan and prepare all long-range management plans for the biology and visitor services programs, including the 15-year comprehensive conservation plans...". Where are these staff and the project leader for this CCP process?

My first specific comment addresses the Vision Statement, which is fairly well done with one exception. There is no articulated vision of specific habitats with desired conditions representing the Inter-Montane Valleys where the Complex is found. Nor is there any vision of high profile iconic species of fish and wildlife most associated with these landscapes. This is a major oversight and must be addressed if you want the public to share your vision.

Next, and considered most important at this stage of the CCP process, are the Goal Statements. The natural resource oriented statements are so generic they could be applied to any national wildlife refuge of the National Wildlife Refuge System (System). Simply change the ecosystem landscape and the statement can be used anywhere in the System. Goals are to be specific to a particular refuge based on criteria of refuge purposes, establishing authorities, biological diversity, and how refuge habitats and fish and wildlife resources fit into the bigger picture of priority landscapes and resources of Service conservation partners. Again, this is where pre-planning comes into play. Below is a discussion, which exemplifies how the process should go to arrive at transparent and logical goal statements benefiting the refuge and adjacent ecosystems.

The planning team must first address all Biological Resources of Concern by completing an analysis of bio-diversity resources with consideration of their existing and historical importance, desired structural conditions, natural processes, and limiting factors. A good example to start with would be the Palouse Bunchgrass Prairie. Next the team should flush out all potential fish, wildlife, and plant species of relative importance to this landscape in association with refuge purposes, diversity, and many other conservation efforts considered a priority by other Service partners. Those species of highest priority and which are considered high profile users of this prairie type should be selected as focal species. The team should define desired habitat characteristics for these focal species given their life history uses of this habitat, and recognize other guilds and/or species benefiting from these defined habitat conditions. Only now does the planning team have all the relevant information to develop a goal statement for Palouse Bunchgrass Prairie.

A goal statement for the Palouse Bunchgrass Prairie could be, "Maintain, enhance, and restore Palouse bunchgrass prairie consistent within the historical range of variability representative of the Inter-Montane Valleys ecosystem to support Bison, other native ungulates, and breeding and migratory landbirds". The goal statement, with support of the above mentioned pre-planning documents, now provides the building blocks for the development of measurable objectives with desired physical conditions, management strategies, and the rationale for quality decision making. An objective could be, "Enhance and maintain X acres under X defined conditions of Palouse bunchgrass prairie". Another objective could address restoration and so on. It is important that the objective for accomplishments reflect a horizon of only 15 years. This type of effort needs to be carried out for the development of each objective. If these steps are properly carried out, the planning team will move from their current process of preparing a Conceptual Conservation Plan to preparing a meaningful Comprehensive Conservation Plan.

Lastly, it is strongly recommended that further work on draft alternatives remain pending until quality goal statements can be prepared following a pre-planning effort. Otherwise more time and money will simply be wasted because a reasonable set of alternatives, with a defensible management direction, can't be developed

without quality goals. That said, comments are provided for consideration at a future date.

Most of the Topic Areas, such as Bison, should take on the characteristics of goal statements. Those thoughts defined as Actions, can then become strategies. The first "No Action" alternative is profoundly flawed in that the existing actions can no way be accomplished using existing staffing as the baseline. It is very apparent that these existing actions were being carried out by an organizational structure supported under the "No Action" alternative of the draft Environmental Assessment addressing an Annual Funding Agreement with the Confederated Salish and Kootenai Tribes. Therefore, a minimum of 11 permanent positions, supplemented with temporary jobs, should be the staffing baseline under the current "No Action" alternative.

The alternative for "Maximizing Quality of Public Experiences" does the best job, compared to other alternatives, in laying out a real change in management direction. The other alternatives do little in creating separation from the "No Action". This should be greatly improved upon. There are some good suggestions for actions (strategies) under each alternative, and there are some very undesirable ones that should be dropped from further consideration. Some suggestions should be much better defined for carrying more weight as a possible consideration. It is recommended that an additional alternative, something like "A Balanced Approach to Management Direction", be developed which harnesses the best strategies of all other alternatives. Without question, if developed, it should adopt the organizational structure as referenced above along with any additional positions outlined under other alternatives (i.e. visitor services).

There are far to many good thoughts and actions to address them all. That said, there are a few resource oriented ones that should be pointed out. With regards to bison; maintaining a meta-population framework and working with partners committed to that end, expansion of grazing use on adjacent prairie grasslands, and infusion of other herd genetics, are all worthy in the conservation effort. Partnership type projects such as the reintroduction of sharp-tailed grouse, development of wildlife health program protocols, and enhancement of pollination habitats are great candidates as well. Restoration using original natural hydrology, the emphasis of habitat connectivity and corridors, and the restoration of natural fire regimes are principles that should be carried forward. Mechanical treatments to restore a lost balance in vertical structure of forest types, and vehicle wash stations to reverse the spread of invasive plant species are all of no lesser importance.

The same can be said for visitor service type actions. Consideration of opportunities for conducting special hunts and the expansion of fishing along the Jocko River are good suggestions. Along those lines, the exploration of a viewing wayside along Highway 200 is an excellent idea given few people even realize they are driving adjacent to a national wildlife refuge. Creation of a team for cultural resource

interpretation is a natural and should be embedded into daily operations. Without question, there are many non-traditional forms of funding opportunities that must be tapped into for infrastructure and program enhancements.

General public camping and the authorization of non-appropriate uses should be viewed with caution and preferably dropped from further consideration (i.e. snowboarding, sledding, skating).

There are several quality partnerships with tribes and other government agencies currently in place such as those that are operational in the use of prescribed fire and wildlife suppression. But many other partnerships can be developed and expanded upon. For example, development of a Friends group and major volunteer program can be instrumental in easily expanding three fold the completion of staff workload operational activities under program direction of the refuge, especially in the visitor services arena. Operations of the visitor center and most activities of the environmental education program can be carried out by trained paid and/or volunteer staff of any established Friends organization. Annual teacher workshops held at the refuge can be fully planned and executed using Friends volunteer labor under direction of station program personnel. Following the principle of "teaching the teachers to teach" will result in a significant lift to any educational program. Look no further for exemplary models than beyond the well oiled machine operations of the Oregon Coast, Nisqually in Washington State, and the Tualatin River refuge in the metropolitan area of Portland, Oregon. All of these Pacific Region stations have strong interaction and support with and from tribal governments.

Strategies to be avoided, that can't be endorsed under any circumstances, include 1) the Service delegating management authority to another entity, and 2) entering into an Annual Funding Agreement. It is questionable whether delegation of management to any entity, outside exclusive management control by the Service, can be condoned due to conditions articulated in congressional legislation of the 1970s. Furthermore, it's totally unnecessary to enter into pooled human resource arrangements, the sharing of allocated funds, or other liberal staffing actions with other entities because there are numerous landscape scale collaborative and joint venture project examples to draw from that have met common resource goals via means of partnership cooperation and coordination. This same spirit of cooperation can be achieved with tribal governments without the detailed complexities of an Annual Funding Agreement, which hasn't had a good track record of smooth operations at this Complex.

It is apparent that a change in planning direction is paramount if a quality Comprehensive Conservation Plan for the National Bison Range Complex is going to be prepared within the spirit of Service planning policy as directed by the National Wildlife Refuge Improvement Act. The Fish and Wildlife Service leadership, and planning team staff, need to recognize this planning process is at a major crossroads in providing management direction over the next 15 years to conserve the American

bison, manage jurisdictional species, and improve upon the diversity of large-scale landscapes. It is with this thought in mind that the Service should revisit its work to date, make necessary changes, and properly follow protocols of CCP planning from this point forward. Only then will a Comprehensive Conservation Plan be prepared that is inspiring, biologically meaningful, and enthusiastically endorsed by partners. Fish and wildlife resources of this iconic refuge, and the American people, deserve nothing less from excellence.

Please feel free to contact me if you have any questions regarding these comments.



Scoping NBR, FW6 <scoping_nbr@fws.gov>

[EXTERNAL] Bison Range

Thu, May 24, 2018 at 12:59 PM

To: "Scoping_nbr@fws.gov" <Scoping_nbr@fws.gov>

Dear Planning Team:

On behalf of our members and supporters, The Wilderness Society appreciates the opportunity to participate in the public process related to the development of the Comprehensive Conservation Plan for the National Bison Range. We have reviewed the documents provided and request to remain apprised throughout the process. We have previously submitted comments and at this time we have no additional comments.

Best Regards,

Jennifer Ferenstein

Senior Representative

The Wilderness Society

May 25, 2018

Vanessa Fields, Planning Team Leader, NBR
U.S. Fish and Wildlife Service, Division of Scientific Resources
922 Bootlegger Trail
Great Falls, MT 59404

Ms. Fields:

RE: Draft Comprehensive Conservation Plan (CCP) for the National Bison Range – and other units of the current NBR Complex.

These comments are submitted on behalf of the Blue Goose Alliance, a private, non-profit conservation organization. The BGA is primarily devoted to the National Wildlife Refuge System: its Integrity, Stature, and Autonomy. We have closely followed and often commented upon the issues associated with the National Bison Range (NBR) and Complex (NBRC) since our establishment in 2000. Our members and supporters often visit the refuges in the complex. Most of our BGA Associates are retired refuge managers and employees, refuge and Fish and Wildlife Service (FWS) administrators, avid past and present volunteers and others deeply interested in wildlife and habitat conservation matters across America.

Although we appreciate an opportunity to comment, past such experiences with the Denver Region of the FWS have consistently demonstrated an agency practice of failure to in fact analyze, utilize or answer even the most thoughtful and constructive submissions of detailed and authoritative comments from knowledgeable, obviously interested people. We hope this effort will not be received and treated in such a manner.

Proposed No Action Alternative is Unacceptable

At the outset, it is necessary to urge the Planning Team and the Region to replace the proposed “No Action Alternative.” As proposed, that Alternative would “continue all the current management activities, and maintain funding, infrastructure, all programs, and staffing at the **existing levels**. (emphasis added). Those levels are demonstrably, and without doubt, incapable of accomplishing the mandates expressed in 16 USC 668dd (a)(2), (a)(3), and (a)(4).

Given the mandate in subsection 668dd(a)(1) that the units of the National Wildlife Refuge System “... shall be administered by the Secretary through the United States Fish and Wildlife Service” –coupled with the explicit responsibility set forth in subsection (e)(2): “In developing each comprehensive conservation plan under this subsection for a planning unit, the Secretary, acting through the Director, shall identify and describe—” [see 668dd(e)(2)(A-F)]. The requirements thus placed upon the FWS, particularly in subsection 668dd(3)(A), *vis*: “each refuge shall be managed to fulfill the mission of the

System, as well as the specific purposes for which that refuge was established;” and those in 668dd(a)(4)(A-L) are vitally important mandates.

Implementing Alternative A as described and including currently severe restrictions of staffing and funding plus elimination of previously operational practices and programs would result in utter failure to comply with the basic National Wildlife Refuge statute – its “Organic Act” as it is often called.

The BGA recommends that FWS develop a new “No Action Alternative” based on the operation of the NBR Complex in FY 2012. The Secretary and FWS were mandated in the Refuge Improvement Act of 1997 to complete Comprehensive Conservation Plans for all refuges and other areas of the Refuge System no later than October 9, 2012. Therefore, there is a substantial logical argument that FWS should utilize that final deadline year as the basis for its No Action Alternative.

The present depleted operations and other programs of the complex are entirely based upon two factors: 1) anticipation of entering an Annual Funding Agreement with the Confederated Salish and Kootenai Tribes; and 2) reductions of staff and funding because of a proposal initiated in 2015 to negotiate a transfer of the refuge including its wildlife and physical facilities etc., to the tribes. Neither of those two factors are relevant to the CCP, nor should be permitted to affect the mandates of the National Wildlife Refuge System Administration Act.

It is noteworthy -- and should be so stated in the CCP that the NBR was (a) the first refuge in the System created by Act of Congress; (b) the first national wildlife refuge created for preserving the American plains bison; and (c) the first national wildlife refuge acquired by Congressional Appropriations, and (d) the first national wildlife refuge to receive congressional appropriations for its operations and maintenance beginning in 1908. Since then, the Congress has never failed on behalf of all Americans to appropriate the funds and staff necessary to sustain wildlife and habitats of the NBR, including units of the Complex added later.

For more than 100 years, the National Bison Range has successfully preserved and managed the plains bison herd donated to the Federal Government by the American Bison Society in 1909-1910. Thus, the FWS cannot claim that this vital refuge and its equally vital bison herd and other wildlife and habitats is not sustainable at the level required to achieve its primary purposes and properly contribute to the mission of the Refuge System.

The Collaborative/Partner-Based Landscape Level Conservation Alternative Should be eliminated

Proposed Alternative E would be better labelled “The NO PLAN ALTERNATIVE.” Its provisions (with but few references to an undefined “Same approach as Alternative A, plus”), indicate that all future decisions related to management of the NBR—and other units of the complex—would be developed later in consultation with other entities. In all, more than 27 “teams” would be created in the future or specific programs would

be developed via “collaborative, cooperative, and coordinated management actions by the Refuge staff (even though such staff would be lacking a Project Leader and/or Deputy, a Senior Biologist, a Range Specialist, or a designated Foreman). The result would be complete lack of a CCP as directed by the Congress, and an impossibly limited staff at the Complex to effectively convene and participate with 27 individual and distinct “teams” on major issues with little guidance on purposes or objectives.

In short, this proposed alternative would be totally in non-compliance with the NWRSA and should be eliminated from the proposed CCP.

Alternatives B, C and D are mere “Labels” lacking essential details for evaluation

Based on reports received by the BGA from members and supporters who attended the recent FWS-sponsored CCP meetings in Montana, in response to questions regarding the particulars of these alternatives, FWS personnel stated that the Alternatives – other than the No Action Alternative, were merely labels (*i.e.* “placeholders”) which could not be developed until a “preferred alternative” has been selected by the FWS.

In our experience, the BGA has never encountered a released draft CCP where the public meetings (beyond the initial agency Scoping Process) attempted to obtain public input to such a “non-proposal” proposal. This is an indisputable admission that the entire “Preplanning process” outlined in the Refuge Systems’ Manual has not been completed—in fact it would appear, based on all available evidence, that no preplanning effort has been initiated. That is unacceptable and, in our view, violates provisions of the Department of the Interior/Department of Justice settlement in the lawsuit by Public Employees for Environmental Responsibility.

The FWS should withdraw the released “Draft CCP for the NBR and initiate actions to comply with provisions of their Planning Manual and the Court approved settlement

The Blue Goose Alliance is committed to work with the Fish and Wildlife Service to achieve a meaningful, thoughtful, and much deserved Comprehensive Conservation Plan for the National Bison Range and the National Bison Range Complex. The interested public deserves to have meaningful proposals laid before them upon which to provide comments, suggestions and recommendations. To date, the FWS has failed to provide the basic planning elements for the public to review. The FWS should withdraw this “Draft” and begin anew by diligently completing all elements of the Preplanning process and, based upon those products, developing a realistic and hopefully forward-thinking draft, with a realistic No Action Alternative as required by the Council on Environmental Quality standards for Environmental Impact documents and legitimate, fully explained, reasonable alternatives for public consideration.

We respectfully point out, once again, that the NWRSA itself places explicit mandates on the Secretary of the Interior and the Director of the U.S. Fish and Wildlife Service regarding development and content of Comprehensive Conservation Plans.

(Note: for your convenience, we have scanned provisions of the National Wildlife Refuge System Administration Act (NWRSA) referred to herein and attached them to these comments).

As indicated at the outset, we appreciate the opportunity to comment and sincerely hope that the FWS will carefully consider these constructive comments.

APPENDIX A – Selected Excerpts
from the National Wildlife Refuge System Administration Act
(16 USC 668dd) related to DOI and FWS responsibilities
regarding development of Comprehensive Conservation Plans.

16 U.S. Code § 668dd - National Wildlife Refuge System

(a) Designation; administration; continuance of resources-management-programs for refuge lands in Alaska; disposal of acquired lands; proceeds

(1) For the purpose of consolidating the authorities relating to the various categories of areas that are administered by the Secretary for the conservation of fish and wildlife, including species that are threatened with extinction, all lands, waters, and interests therein administered by the Secretary as wildlife refuges, areas for the protection and conservation of fish and wildlife that are threatened with extinction, wildlife ranges, game ranges, wildlife management areas, or waterfowl production areas are hereby designated as the "National Wildlife Refuge System" (referred to herein as the "System"), which shall be subject to the provisions of this section, and shall be administered by the Secretary through the United States Fish and Wildlife Service. With respect to refuge lands in the State of Alaska, those programs relating to the management of resources for which any other agency of the Federal Government exercises administrative responsibility through cooperative agreement shall remain in effect, subject to the direct supervision of the United States Fish and Wildlife Service, as long as such agency agrees to exercise such responsibility.

(2)

The mission of the System is to administer a national network of lands and waters for the conservation, management, and where appropriate, restoration of the fish, wildlife, and plant resources and their habitats within the United States for the benefit of present and future generations of Americans.

(3) With respect to the System, it is the policy of the United States that—

(A)

each refuge shall be managed to fulfill the mission of the System, as well as the specific purposes for which that refuge was established;

(B)

compatible wildlife-dependent recreation is a legitimate and appropriate general public use of the System, directly related to the mission of the System and the purposes of many refuges, and which generally fosters refuge management and through which the American public can develop an appreciation for fish and wildlife;

(C)

compatible wildlife-dependent recreational uses are the priority general public uses of the System and shall receive priority consideration in refuge planning and management; and

(D)

when the Secretary determines that a proposed wildlife-dependent recreational use is a compatible use within a refuge, that activity should be facilitated, subject to such restrictions or regulations as may be necessary, reasonable, and appropriate.

(4) In administering the System, the Secretary shall—

(A)

provide for the conservation of fish, wildlife, and plants, and their habitats within the System;

(B)

ensure that the biological integrity, diversity, and environmental health of the System are maintained for the benefit of present and future generations of Americans;

(C)

plan and direct the continued growth of the System in a manner that is best designed to accomplish the mission of the System, to contribute to the conservation of the ecosystems of the United States, to complement efforts of States and other Federal agencies to conserve fish and wildlife and their habitats, and to increase support for the System and participation from conservation partners and the public;

(D)

ensure that the mission of the System described in paragraph (2) and the purposes of each refuge are carried out, except that if a conflict exists between the purposes of a refuge and the mission of the System, the conflict shall be resolved in a manner that first protects the purposes of the refuge, and, to the extent practicable, that also achieves the mission of the System;

(E)

ensure effective coordination, interaction, and cooperation with owners of land adjoining refuges and the fish and wildlife agency of the States in which the units of the System are located;

(F)

assist in the maintenance of adequate water quantity and water quality to fulfill the mission of the System and the purposes of each refuge;

(G)

acquire, under State law, water rights that are needed for refuge purposes;

(H)

recognize compatible wildlife-dependent recreational uses as the priority general public uses of the System through which the American public can develop an appreciation for fish and wildlife;

(I)

ensure that opportunities are provided within the System for compatible wildlife-dependent recreational uses;

(J)

ensure that priority general public uses of the System receive enhanced consideration over other general public uses in planning and management within the System;

(K)

provide increased opportunities for families to experience compatible wildlife-dependent recreation, particularly opportunities for parents and their children to safely engage in traditional outdoor activities, such as fishing and hunting;

(L)

continue, consistent with existing laws and interagency agreements, authorized or permitted uses of units of the System by other Federal agencies, including those necessary to facilitate military preparedness;

clause shall examine compliance with the terms and conditions of the authorization, not examine the authorization itself;

(viii)

require, after an opportunity for public comment, reevaluation of each compatible wildlife-dependent recreational use when conditions under which the use is permitted change significantly or if there is significant new information regarding the effects of the use, but not less frequently than in conjunction with each preparation or revision of a conservation plan under subsection (e) or at least every 15 years, whichever is earlier; and

(ix)

provide an opportunity for public review and comment on each evaluation of a use, unless an opportunity for public review and comment on the evaluation of the use has already been provided during the development or revision of a conservation plan for the refuge under subsection (e) or has otherwise been provided during routine, periodic determinations of compatibility for wildlife-dependent recreational uses.

(4)The provisions of this Act relating to determinations of the compatibility of a use shall not apply to—

(A)

overflights above a refuge; and

(B)

activities authorized, funded, or conducted by a Federal agency (other than the United States Fish and Wildlife Service) which has primary jurisdiction over a refuge or a portion of a refuge, if the management of those activities is in accordance with a memorandum of understanding between the Secretary or the Director and the head of the Federal agency with primary jurisdiction over the refuge governing the use of the refuge.

(e) REFUGE CONSERVATION PLANNING PROGRAM FOR NON-ALASKAN REFUGE LANDS

(1)

(A) Except with respect to refuge lands in Alaska (which shall be governed by the refuge planning provisions of the Alaska National Interest Lands Conservation Act (16 U.S.C. 3101 et seq.)), the Secretary shall—

(i)

propose a comprehensive conservation plan for each refuge or related complex of refuges (referred to in this subsection as a “planning unit”) in the System;

(ii)

publish a notice of opportunity for public comment in the Federal Register on each proposed conservation plan;

(iii)

issue a final conservation plan for each planning unit consistent with the provisions of this Act and, to the extent practicable, consistent with fish and wildlife conservation plans of the State in which the refuge is located; and

(iv)

not less frequently than 15 years after the date of issuance of a conservation plan under clause (iii) and every 15 years thereafter, revise the conservation plan as may be necessary.

(B)

The Secretary shall prepare a comprehensive conservation plan under this subsection for each refuge within 15 years after October 9, 1997.

(C)

The Secretary shall manage each refuge or planning unit under plans in effect on October 9, 1997, to the extent such plans are consistent with this Act, until such plans are revised or superseded by new comprehensive conservation plans issued under this subsection.

(D)

Uses or activities consistent with this Act may occur on any refuge or planning unit before existing plans are revised or new comprehensive conservation plans are issued under this subsection.

(E)

Upon completion of a comprehensive conservation plan under this subsection for a refuge or planning unit, the Secretary shall manage the refuge or planning unit in a manner consistent with the plan and shall revise the plan at any time if the Secretary determines that conditions that affect the refuge or planning unit have changed significantly.

(2)In developing each comprehensive conservation plan under this subsection for a planning unit, the Secretary, acting through the Director, shall identify and describe—

(A)

the purposes of each refuge comprising the planning unit;

(B)

the distribution, migration patterns, and abundance of fish, wildlife, and plant populations and related habitats within the planning unit;

(C)

the archaeological and cultural values of the planning unit;

(D)

such areas within the planning unit that are suitable for use as administrative sites or visitor facilities;

(E)

significant problems that may adversely affect the populations and habitats of fish, wildlife, and plants within the planning unit and the actions necessary to correct or mitigate such problems; and

(F)

opportunities for compatible wildlife-dependent recreational uses.

(3)In preparing each comprehensive conservation plan under this subsection, and any revision to such a plan, the Secretary, acting through the Director, shall, to the maximum extent practicable and consistent with this Act—

(A)

consult with adjoining Federal, State, local, and private landowners and affected State conservation agencies; and

(B)

coordinate the development of the conservation plan or revision with relevant State conservation plans for fish and wildlife and their habitats.

(4)

(A)

In accordance with subparagraph (B), the Secretary shall develop and implement a process to ensure an opportunity for active public involvement in the preparation and revision of comprehensive conservation plans under this subsection. At a minimum, the Secretary shall require that publication of any final plan shall include a summary of the comments made by States, owners of adjacent or potentially affected land, local governments, and any other affected persons, and a statement of the disposition of concerns expressed in those comments.

(B)

Prior to the adoption of each comprehensive conservation plan under this subsection, the Secretary shall issue public notice of the draft proposed plan, make copies of the plan available at the affected field and regional offices of the United States Fish and Wildlife Service, and provide opportunity for public comment.

(f) PENALTIES

(1) KNOWING VIOLATIONS

Any person who knowingly violates or fails to comply with any of the provisions of this Act or any regulations issued thereunder shall be fined under title 18 or imprisoned for not more than 1 year, or both.

(2) OTHER VIOLATIONS

Any person who otherwise violates or fails to comply with any of the provisions of this Act (including a regulation issued under this Act) shall be fined under title 18 or imprisoned not more than 180 days, or both.

(g) ENFORCEMENT PROVISION; ARRESTS, SEARCHES, AND SEIZURES; CUSTODY OF PROPERTY; FORFEITURES; DISPOSITION

Any person authorized by the Secretary to enforce the provisions of this Act or any regulations issued thereunder, may, without a warrant, arrest any person violating this Act or regulations in his presence or view, and may execute any warrant or other process issued by an officer or court of competent jurisdiction to enforce the provisions of this Act or regulations, and may with a search warrant search for and seize any property, fish, bird, mammal, or other wild vertebrate or invertebrate animals or part or nest or egg thereof, taken or possessed in violation of this Act or the regulations issued thereunder. Any property, fish, bird, mammal, or other wild vertebrate or invertebrate animals or part or egg thereof seized with or without a search warrant shall be held by such person or by a United States marshal, and upon conviction, shall be forfeited to the United States and disposed of by the Secretary, in accordance with law. The Director of the United States Fish and Wildlife Service is authorized to utilize by agreement, with or without reimbursement, the personnel and services of any other Federal or State agency for purposes of enhancing the enforcement of this Act.

(h) REGULATIONS; CONTINUATION, MODIFICATION, OR RESCISSION

Regulations applicable to areas of the System that are in effect on October 15, 1966, shall continue in effect until modified or rescinded.



National Headquarters

1130 17th Street, N.W. | Washington, D.C. 20036-4604 | tel 202.682.9400 | fax 202.682.1331
www.defenders.org

Submitted electronically to Scoping_nbr@fws.gov and Scoping_pablo_ninepipe@fws.gov

May 25, 2018

Vanessa Fields
Planning Team Leader
U.S. Fish and Wildlife Service
Division of Scientific Resources
922 Bootlegger Trail
Great Falls, Montana 59404

Bernardo Garza
Planning Team Leader
U.S. Fish and Wildlife Service
Branch of Planning and Policy
134 Union Boulevard, Suite 300
Lakewood, Colorado 80228

RE: Draft Alternatives for Future Management; National Bison Range Complex

Dear Ms. Fields and Mr. Garza:

Defenders of Wildlife (Defenders) appreciates the opportunity to provide input on the Planning Update: Draft Alternatives for Future Management for the National Bison Range Complex (April 2018), presenting a draft vision, draft goals, and draft range of management alternatives associated with development of comprehensive conservation plans (CCP) for Complex units. Defenders provided scoping comments in response to the notice of intent to prepare a CCP for the National Bison Range in June 2017, which we also incorporate by reference here, as appropriate.

Founded in 1947, Defenders is a national conservation organization focused on conserving and restoring native species and their habitats across the country. Based in Washington, DC, the organization also maintains six regional field offices and represents more than 1.8 million members and supporters in the United States and around the world, with nearly 5,000 in Montana. Defenders is deeply involved in public lands management and wildlife conservation, including the protection and recovery of flora and fauna in the Northern Rockies.

Draft Vision

According to the U.S. Fish and Wildlife Service's (Service) CCP planning policy, "the vision [for a CCP] should focus on what will be different in the future because of our efforts, capture the essence of what we are trying to do, and why" (602 FW 3 (3.4)C(1)(g)). The policy suggests that each individual planning unit/CCP will include a vision statement for that unit. As the Service is developing CCPs for the National Bison Range and Lost Trail, Pablo and Ninepipe national wildlife

refuges, it may be both appropriate and advantageous to develop separate and distinct visions for each CCP. Doing so would allow for more specificity to capture the essence of wildlife conservation issues and values associated with each refuge unit. For example, a vision for the Bison Range CCP could articulate its unique role in protecting one of the largest and last remaining tracks of intact, publicly-owned intermountain native grasslands in the United States (among the rarest habitat types in North America). Ideally, the CCPs would include a unified vision statement for the Complex with tiered individual NWR vision statements to guide effective planning and implementation on each unit.

We appreciate the vision's reference to preserving connectivity across the landscape. As we noted in our scoping comments, landscape connectivity is critical consideration in resource and land use planning to sustain biodiversity. In addition to maintaining existing connectivity, it may be appropriate for the vision(s) to strive to increase and restore connectivity both within individual units and across the Complex. As noted elsewhere in the proposal (Alternative E), the Complex has the opportunity to work with partners to address conservation issues on the surrounding landscape, including the identification and conservation of corridors for wildlife migration and movement. Language to both preserve and restore/create connectivity within units and throughout the Complex landscape could be a good addition to the vision statement(s).

Draft Goals

As with the vision, the Service's planning policy suggests that "[a]t a minimum, each refuge should develop goals" including "for wildlife species or groups of species, habitat...and fish, wildlife, and plant populations..." (602 FW 3 (3.4)C(1)(g)). Again, we recommend that unit/CCP specific goals may help ensure clarity and effectiveness in CCP planning and implementation.

The draft Wildlife Management and Habitat Management goals are rather generic and could be enhanced to effectively "identify and focus management priorities, provide a context for resolving issues, guide specific projects, provide rationale for decisions, and offer a defensible link among management actions, refuge purpose(s), Service policy, and the National Wildlife Refuge System mission" (USFWS, *Writing Refuge Management Goals and Objectives: A Handbook*, p. 1). Examples provided in the Service's handbook point to some degree of specificity for wildlife and habitat goals, such as: "Restore refuge prairie to historic conditions to support pre-European settlement abundance and diversity of grassland-dependent migratory birds" (p. 5). As noted in the handbook, it is important to specify the subject, attribute, target, and action. Measurable target conditions are important to establish meaningful objectives and support effective conservation actions. Wildlife conservation goals in the Planning Update should be more specific, reflective of the species composition of the Complex, including key species of concern such as bison, Canada lynx, grizzly bear, wolverine, bighorn sheep and others.

The Service should also consider adopting a goal to develop and sustain partnerships for collaborative management of refuge resources, in accordance with agency policies (e.g., Native American Policy), to achieve the vision adopted for each Complex unit.

Draft Alternatives for Future Management

We appreciate the initial presentation of conceptual alternatives in the Planning Update. Each identifies elements that may be applicable to the CCPs. Developing alternatives based on thematic areas of emphasis is useful for comparing management options and effects.

Alternative B, which conceptually “maximizes” the quality of public experiences on Complex units, may not support optimal management for achieving the mission of the National Wildlife Refuge System or purposes of the individual units within the Complex. We note that under this alternative, the units simply “*aim* to maintain natural processes and healthy wildlife populations” (emphasis added), which is a rather tepid statement. As we noted in our scoping comments for the Bison Range, “each alternative...must examine how management would achieve [refuge] goals ... and uphold Congressional mandates to conserve native species, biodiversity, and other public values...” According to Service planning policy, planning goals are to “ensure that wildlife comes first in the National Wildlife Refuge System” and that management of each refuge “help fulfill the System mission, maintain and, where appropriate, restore the ecological integrity of each refuge and the Refuge System, as well as achieve the specific purposes for which the refuge was established” (602 FW 3(3.3)(A)). The NEPA documents associated with the current planning process should evaluate and explain the extent to which each management alternative achieves these goals.

Alternatives C, D and E likely would complement one another to craft CCPs that meet refuge policy requirements and realize conservation goals. The refuge units have obligations to manage for ecological/biological integrity as well as the persistence of individual species. We would therefore expect that elements from each alternative would be relevant to the final CCPs. By parsing the alternatives, the agency would be able to determine where management of ecological communities may be the most effective means of meeting policy requirements and goals, and where species-focused management may be the more optimal method. Comparison of alternatives can also expose potential conflicts between broader ecological objectives (such as resiliency) and the specific species needs. We are intrigued by the “prioritization framework” referenced under Alternative C and look forward to more information on that concept.

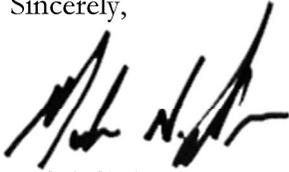
Under Alternative D, we are curious how “carrying capacity for target species” would be determined, as well as seeing the complete list of target species associated with each unit (the Planning Update only gives examples). The statement that “[c]arrying capacity for bison would be determined in concert with carrying capacities for other species” requires further explanation. Assessing tradeoffs amongst target species will be a critical part of this assessment, given the multitude of refuge policy goals and conservation obligations. Similarly, we are intrigued at the “corridor concept for transient species populations (e.g., wolverine, lynx, grizzlies, wolves).” CCPs will play a key role in both identifying, protecting and perhaps restoring wildlife corridors, and should contribute to enhanced landscape-level (i.e., multiple land ownership) connectivity for wildlife.

To that end, we also believe Alternative E will play a key role in shaping the final CCPs, which should facilitate and contribute to “connectivity with the larger landscape” and “provide better opportunities for fish, plant, and wildlife habitat on lands outside the boundaries of our units by creating corridors for habitats, conducive to wildlife migration and movement.” Finally, we support CCPs that “facilitate collaborative, cooperative, and coordinated management of the Complex...” Defenders considers ourselves a partner in this exercise, and supports CCP(s) that promote a

meaningful role for key stakeholders in the management of the National Bison Range and Lost Trail, Pablo and Ninepipe national wildlife refuges.

Thank you for this opportunity to offer comment on the National Bison Range Complex planning. We look forward to the next stage of the process.

Sincerely,

A handwritten signature in black ink, appearing to read "Peter Nelson". The signature is stylized and written in a cursive-like font.

on behalf of

Peter Nelson
Director, Federal Lands

Vanessa Fields

Planning Team Leader

U.S. Fish and Wildlife Service

Division of Scientific Resources

922 Bootlegger Trail

Great Falls, Montana 59404

SUBJECT: Comments CCP & EIS *National Bison Range*

Thank you for the information and discuss you and the staff provided at the Leon Hall meeting May 10, 2018. The lack of product and cost data hampers the review of the document.

Comment one

I have made some budget estimates based on the FWS FY 2019 budget justification. Using the National Wildlife System cost on page NWRS-1 as a source. I made three estimates one based on number of units managed by FWS and based on percentage of visitor days using 200,000 and the 2014 number of 250,000. There is a significant issue with this table as the Total national Wildlife Refuge Cost and FTE are about half the total of the six components. Cost estimates need to be included in this document.

		ADMIN UNITS 566+38+50+7	200000 53000000	250000 53000000	NBR TOTAL
2019 budget request		661	0.38%	0.47%	
			\$		
wildlife and habitat management	\$228,332,000	\$345,434	861,630	\$1,077,038	
FTE	1370		5	6	
refuge visitor services	\$71,267,000	\$107,817	\$268,932	\$336,165	
FTE	517		2	2	
conservation planning	0		0	\$0	
FTE	0		\$0	\$0	
	\$				
refuge operation	337,582,000.00	\$510,714	\$1,273,894	\$1,592,368	
FTE	2125		8	10	
refuge maintenance	\$135,487,000	\$204,973	\$511,272	\$639,090	
FTE	574		2	3	
TOTAL OF SUM	\$772,668,000	\$1,168,938	\$2,915,728	\$3,644,660	
TOTAL OF SUM	4586	7	17	22	
TOTAL REQUESTED	\$473,069,000	\$715,687	\$1,785,166	\$2,231,458	
TOTAL FTE REQUESTED	2699	4	10	13	
DIFFERENCE DOLLARS	\$299,599,000	\$453,251	\$1,130,562	\$1,413,203	
DIFFERENCE FTE	1887	3	7	9	

COMMENT 2 The economic benefit to the community should be included the FWS 2011 evaluation estimated \$13,000,000. Based on 200,000 visitor days. Using the CPI index the current value is \$14,500,000. If 250,000 visitors is more realistic the benefit would increase to \$16,250,000.

COMMENT 3. The No Action alternative should include a discussion of the limitation the current budget has on infrastructure, programs, and staffing. What is the current budget sacrificing compared to the management level and resource uses when the refuge was fully funded.

COMMENT 4. Support most action items in alternative A. Except restoring and sustain original fire regime to the maximum extent possible. In the natural state after a fire the animals might not return for four or five years. I would suggest that implementing an intensive grazing system which included a fire management and restoration would be a more effective method of addressing wildfire on the NBR.

COMMENT 5. Increase hunting opportunities on the NBR by implementing a Trophy Hunting Program that would include using the existing bidding process or raffle provide the opportunity to Harvest a Post Breeding Bull Bison. Five trophy bulls would provide more income to the NBR than the current auction of young animals. These would be guided hunts using volunteers or staff as appropriate. Several Trophy Bull elk tags could also be included in the hunting program as well as a Big Horn Ram and several Mule deer bucks. These additions would significantly increase revenue without significantly altering the normal biological properties. The revenue would be specifically utilized toward under funded habitat programs. The program would be sensitive to the public interest. Shooting a large bull elk in the picnic area would be prohibited.

COMMENT 6 Restore the annual horse and mule ride through the NBR by requiring horse diapers and liability insurance and working with local and tribal interest.

COMMENT 7. Implement all the staffing recommendations included in Alternative B. Plus add a manager position with volunteer participation goal of 5000 hours per year.

COMMENT 8. Continue the photography special use permits.

COMMENT 9. Investigate the potential for NBR tours similar to the Glacier NP old tour vans.

COMMENT 10. Alternative E has merit. The challenge is to secure public input to the extent possible without the product being an endless series of meetings that significantly reduce the effectiveness of NBR management.

COMMENT 11. Alternative D should be included in the selected plan recognizing the competition for the available resources between species. For thousands of years a herd of buffalo most likely utilized over a million acres of landscape. That is not feasible today. The best we can do today is utilize an intensive grazing management system.

COMMENT 12. I support the Friends Group concept.

Thank you for the opportunity to review the plan. Given time constraints, available staff, and available resources your task is challenging to say the least. If you have any questions I would be happy to assist.



[EXTERNAL] comments

Fri, May 25, 2018 at 1:21 PM

To: "scoping_nbr@fws.gov" <scoping_nbr@fws.gov>

		ADMIN UNITS		VISITOR DAYS	
				200000	250000NBR
				53000000	53000000TOTAL
2019 budget request		661	0.38%	0.47%	
wildlife and habitat management	\$228,332,000	\$345,434	\$ 861,630	\$1,077,038	
FTE	1370		5	6	
refuge visitor services	\$71,267,000	\$107,817	\$268,932	\$336,165	
FTE	517		2	2	
conservation planning	0		0	\$0	
FTE	0		\$0	\$0	
refuge operation	\$ 337,582,000.00	\$510,714	\$1,273,894	\$1,592,368	
FTE	2125		8	10	
refuge maintenance	\$135,487,000	\$204,973	\$511,272	\$639,090	
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TOTAL OF SUM	\$772,668,000	\$1,168,938	\$2,915,728	\$3,644,660	
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TOTAL FTE REQUESTED	2699	4	10	13	
DIFFERENCE DOLLARS	\$299,599,000	\$453,251	\$1,130,562	\$1,413,203	
DIFFERENCE FTE	1887	3	7	9	

Sent from Mail for Windows 10



Scoping NBR, FW6 <scoping_nbr@fws.gov>

[EXTERNAL] comments

To: "Scoping NBR, FW6" <scoping_nbr@fws.gov>

Sat, May 26, 2018 at 6:34 PM

Hi Vanessa,

I did one more evaluation. Vehicle Washing. Source "comparison of relocatable Commercial Vehicle Washing Systems" Forest Service 0851 1809-SDTDC September 2008. Average cost per day using a contractor in 2008 dollars \$1,700. 10 Cars per hour. Waste water disposal is an issue.

Sent from Mail for Windows 10



[EXTERNAL] National Bison Range CCP

To: scoping_NBR@fws.gov

Fri, May 25, 2018 at 2:38 PM

Flathead Wildlife, Inc., a sportsman's club in northwest Montana, offers the following comments on the National Bison Range CCP.

Draft Comprehensive Conservation Plan for the National Bison Range

National Bison Range NWR

- Part of wildlife management under Alternative E references possibly allowing traditional hunting in part to control bison numbers. Due to the high profile and visible nature of this herd and the presence of the high refuge fence around the NWR, we think this proposal would be controversial and would reflect poorly on hunting. We prefer to use existing culling to maintain proper herd levels and to provide a source population for other herds
- We encourage efforts to allow bison to be able to access additional areas off the NWR, both for herd and range health
- Public access is limited to the road system and limited trails. While we understand the public safety issues, parts of the National Bison Range cannot be seen by the public. We encourage construction of additional roads and trails where feasible to enhance visitor opportunity for wildlife viewing and management to increase winter access.
- Invasive weeds are a real problem in Lake County surrounding the NBR. We encourage chemical and biocontrol, range management and fire as feasible to maintain the palouse prairie and limit conifer encroachment
- Part of the CCP speaks to more partnerships. The cultural connection of the Confederated Salish and Kootenai Tribe to bison provides an avenue for increased interpretation. The CCP also speaks to better coordinating the scattered parcels of the NWR in northwest Montana to provide for coordinated management and better wildlife movement. We encourage increased partnerships with Montana Fish, Wildlife and Parks

Jim Vashro, President

Flathead Wildlife, Inc.

Virus-free. www.avast.com



Scoping NBR, FW6 <scoping_nbr@fws.gov>

[EXTERNAL] PEER Comments on the Comprehensive Conservation Plan for National Bison Range Complex

Fri, May 25, 2018 at 11:27 AM

To: "scoping_pablo_ninepipe@fws.gov" <scoping_pablo_ninepipe@fws.gov>, "scoping_nbr@fws.gov" <scoping_nbr@fws.gov>

Public Employees for Environmental Responsibility (PEER) concurs in, and subscribes to, the comments submitted by \

Jeff Ruch

Executive Director

Public Employees for Environmental Responsibility (PEER)

962 Wayne Ave, Suite 610

Silver Spring, MD 20910

Tel: (202) 265-7337 ; Fax: (202) 265-4192

www.peer.org

May 24, 2018

Vanessa Fields
U. S. Fish and Wildlife Service
Division of Scientific Resources
922 Bootlegger Trail
Great Falls, Montana 59404

Bernado Garza
U.S. Fish and Wildlife Service
Branch of Planning and Policy
134 Union Boulevard Suite 300
Lakewood, Colorado 80228

Ms. Fields and Mr. Garza

The following comments are submitted regarding the draft management plan alternatives for the National Bison Range Complex (NBRC) including Lost Trail NWR in the preparation of a Comprehensive Conservation Plan (CCP) for the complex. It is obvious that the draft alternatives were hastily assembled without the benefit of any pre-planning or input from a fully qualified staffed refuge, which only makes sense and is in line with the Fish and Wildlife Service (FWS) planning manual. Never have I seen any required CCP's developed for any refuge without the full input and leadership from the permanent refuge project leader. The criticism for a less than adequate product rests solely with Regional Office Leadership or lack thereof who must bare the responsibility of trying to complete the task without the benefit of a fully qualified staffed refuge. Someone also has to accept the responsibility for the less than adequate public outreach which obviously accounted for the dismal attendance at the recently conducted open houses.

In reviewing the proposed draft alternatives my first thought is that the FWS is not charged with completing a conceptual conservation Plan, but charged with producing a Comprehensive Conservation Plan. It is still a gigantic waste of time, energy and dollars to continue down the same path of producing two separate CCP's when cumulatively all areas are managed as a complex. I raised this issue in my initial comments for the Federal Register notice of intent to produce a CCP, but it appears no one ever read the comments as I never received an analyses or feedback. There has already been enough wasted tax payers dollars by the FWS at the NBRC which is evident by the dismal track record of losing law suits, and expenses of relocating dedicated employees away from the NBRC because of disagreements with the inept leadership for trying to negotiate away inherent federal responsibilities. Also by producing one CCP for the complex only one National Environmental Policy Act (NEPA) statement will be required for implementation of the completed plan, thereby resulting in extensive savings which can be funneled to the NBRC.

It is long over due for the Regional Office Leadership Team to step up and end this bias

toward the NBRC, in order for a meaningful and useful CCP document can be produced for the fifteen year planning period. The punitive reasons for removing yet another project leader must end and the current manager must be reinstated immediately as his expertise and knowledge of the NBRC is absolutely necessary for the production of the CCP that will serve as a long term guide for management, rather than just satisfying a law suit settlement. With over 500 CCP's produced by the FWS nationally, one conclusion they all have in common is that it takes a project leader and appropriate staffing to complete a quality CCP.

The draft alternatives which were prepared without the benefit of any preplanning effort also need additional attention. The lack of any preplanning is evident throughout the draft alternatives, resulting in less than adequate or quality goal statements. It is laughable to suggest that a quality CCP can be developed with the no action alternative A being the current level of funding and staffing. Alternative A is flawed from the beginning in that existing actions can in no way be accomplished using the depleted existing staff as the baseline. No where in the National Wildlife Refuge System (NWRS) can a refuge complex of this magnitude and complexity be managed and administrated with the current depleted staffing. At a minimum the no action alternative base staff level should be taken from the Regional Office's staffing level that was proposed for transferring refuge functions to the Confederated Salish and Kootenai Tribes (CSKT) under the no action alternative within the 2014 draft EA addressing the Annual Funding Agreement (AFA). The base staff level in that document was set at eleven permanent employees supplemented with numerous temporary positions, this plus the three Lost Trail positions should now be used as the base staffing level for this CCP. This staffing level would be on par with similar complexes elsewhere in Region 6. It may even be low when compared to Ft. Niobrara and Rocky Mt. Arsenal NWR's. Comparing the staffing and funding of the NBRC with the Rocky Mt. Arsenal shows a definite favoritism for the later and a severe bias against the NBRC.

If Region 6 cannot or will not adequately administer the NBRC, alternate A should be expanded to recommend that "all Western Montana Refuges" be transferred to Region 1, where professional leaders have demonstrated that all refuges are funded and staffed in accordance with the complexity of the unit. Region 1 professionals will also provide leadership in compliance with the Federal laws and policy's to insure no refuge is compromised or transferred away from the system.

Alternative E also needs to be altered and expanded so that it is crystal clear that there will be no more negotiations for AFA's with the CSKT. In over two decades of attempts for AFA's by the CSKT they have demonstrated no intention of accepting a reasonable AFA that would preserve the integrity of this iconic refuge. The FWS has already fulfilled its responsibility at multiple times for negotiating in good faith for AFA's with the CSKT. Therefore, it should be clearly spelled out in Alternate E that no AFA will again be negotiated. Coordination or cooperation with any stake holders or partners is important in managing any refuge and should be accomplished with cooperative agreements or memorandum of understanding initiated by the project leader at the field level. Alternative E should also be expanded to make sure it is perfectly clear that The National Wildlife Refuge Administrative Act as well as other Federal Laws preclude any

co-management of any NWR lands, including the NBRC. This is also in compliance with the Native American Policy which was recently rewritten and approved. It must also be made clear that all alternatives must fulfill the purpose and potential in line with the establishment orders of the NBRC.

Finally, unless there is a complete change in attitude by the Regional leaders toward the NBRC the entire effort will be a gigantic waste of everyones time, and the losers will definitely be the American People or true owners of all NWR's as well NBRC resources both human and wildlife.

If you have any questions, please don't hesitate to contact me.



CCP comments for National Bison Range Complex and Lost Trail**NWR**

Attention Bernardo, Vanessa, and U.S. Fish and Wildlife Service,

I am filing this correction notice to the email comments I made on May 25, 2018, concerning the NBR Complex CCP. I realized that I had made a typo error. Instead of 2010, the date should be 2001 in the several places where I referenced it. I have highlighted the corrections below in red.

Thanks for noting this correction and making it in my CCP comments that were filed before the deadline.

-----Original CCP Comments-----

Dear U.S. Fish and Wildlife Service, Conservation Heroes, Congressional Delegation, and Media,

Following are my comments for developing the Comprehensive Conservation Plans (CCP) and the Environmental Impact Statement (EIS) for all the units of the National Bison Range Complex in Montana, as well as for Lost Trail National Wildlife Refuge (NWR), Pablo NWR, Ninepipe NWR, and the Lake County and Flathead County Wetland Management Districts.

COMMENT 1:

To start with, **none of the alternatives in the proposed CCP are appropriate**. The correct and most obvious alternative that should be added to the list of alternatives and selected is one that returns the National Bison Range Complex (NBR) to its operational staffing, status, and budget that was in place prior to **2001** before the Secretary of the U.S. Department of Interior (Gale Norton) and her upper level staff started trying to dismantle the National Bison Range and illegally give it to the Confederated Salish Kootenai Tribe (CSKT) under the guise of the *Indian Self-Determination and Education Assistance Act of 1975 (Public Law 93-638)* and before the CSKT tried to take the NBR away from the National Wildlife Refuge System. The NBR was functioning perfectly as a thriving National Wildlife Refuge before the Dept. of the Interior attempted to give the NBR Complex and its inherently federal positions to the CSKT. The staffing at that time, included the following full-time and part-time positions that should be reinstated immediately and filled immediately with inherently Federal U.S. Fish and Wildlife Service employees. If you need job descriptions/qualifications to announce these positions immediately, I am positive they are on file at the National Bison Range Complex Headquarters. You do not need to "reinvent the wheel."

1. 1 Project Leader.
2. 1 Deputy Project Leader.
3. 1 Lead Biologist.

4. 1 Biologist that focused on invasive plants.
 - A. 2 summer Techs under the biologist.
5. 1 Outdoor Recreation Planner
6. 2 Law Enforcement personnel.
7. 1 Lead Maintenance Person.
8. 4 Staff Members under the Lead Maintenance Person.
9. 2 Summer Staff to run the Visitor's Center.
10. Numerous volunteers.
11. Lost Trail Staff:
 - A. Station Manager
 - B. Biologist
 - C. Maintenance Professional

COMMENT 2:

Fund the National Bison Range National Wildlife Refuge to at least (allow more for inflation) its full funding level of \$1.1 million that was in effect prior to 2001 before the Director of the U.S. Department of Interior (Gale Norton) and her upper level staff started trying to dismantle the National Bison Range NWR and illegally give it to the Confederated Salish Kootenai Tribe (CSKT) under the guise of the *Indian Self-Determination and Education Assistance Act of 1975 (Public Law 93-638)* and before the CSKT tried to take the NBR away from the National Wildlife Refuge System. The NBR Complex was functioning perfectly as a thriving National Wildlife Refuge run by highly qualified and trained U.S. Fish and Wildlife Service employees before the Dept. of the Interior illegally attempted to give the NBR and its inherently federal positions to the CSKT.

COMMENT 3:

Do away with any and all Annual Funding Agreements (AFAs).

COMMENT 4:

Recreate and rely on the extensive list of volunteers that was in effect prior to 2001 before the Director of the U.S. Department of Interior (Gale Norton) and her upper level staff started trying to dismantle the National Bison Range and illegally give it to the Confederated Salish Kootenai Tribe (CSKT) under the guise of the *Indian Self-Determination and Education Assistance Act of 1975 (Public Law 93-638)* and before the CSKT tried to take the NBR away from the National Wildlife Refuge System. The NBRC was functioning perfectly as a thriving National Wildlife Refuge run by highly qualified and trained U.S. Fish and Wildlife Service employees before the Dept. of the Interior illegally attempted to give the NBRC and its inherently federal positions to the CSKT.

COMMENT 5:

Return former Project Leader Jeff King to the NBRC so that he can rebuild the staff and return the NBRC to its operational levels prior to 2010. If Jeff King isn't available to return to the NBRC, then hire the most highly qualified person within the U.S. Fish and Wildlife Service to fill this inherently federal position.

COMMENT 6:

In keeping with President Trump's goal to drain the swamp in the federal government, terminate and replace the following top-ranking individuals within the Dept. of Interior who have done everything in their power to destroy the integrity of the National Bison Range Complex: Jim Cason, Jim Kurth, Cynthia Martinez, Noreen Walsh, Will Meeks, Matt Hogan, (for starters), as well as any other top level officials who have illegally supported giving the NBRC to the Confederated Salish Kootenai Tribe (CSKT) under the guise of the *Indian Self-Determination and Education Assistance Act of 1975 (Public Law 93-638)* and before the CSKT tried to take the NBR away from the National Wildlife Refuge System. Unless and until these individuals are removed from their positions and replaced with career National Wildlife Refuge personnel who are loyal to the Refuge System, the future of the National Bison Range Complex, as well as **all** National Wildlife Refuges in the United States and its territories are in jeopardy. Their interest is not in preserving and enhancing the NBRC. It is obvious since at least **2001** that their interest is in dismantling the NBRC and giving it to the CSKT. The NBRC was functioning perfectly as a thriving National Wildlife Refuge run by highly qualified and trained U.S. Fish and Wildlife Service employees before the Dept. of the Interior illegally attempted to give the NBRC and its inherently federal positions to the CSKT.

Thank you for the opportunity to comment and provide input for the Comprehensive Conservation Plans (CCP) and the Environmental Impact Statement (EIS) for all the units of the National Bison Range Complex in Montana, as well as for Lost Trail National Wildlife Refuge (NWR) Pablo NWR, Ninepipe NWR, and the Lake County and Flathead County Wetland Management Districts.



Scoping NBR, FW6 <scoping_nbr@fws.gov>

[EXTERNAL] National Bison Range Complex - CCP comments

To: "Scoping_nbr@fws.gov" <Scoping_nbr@fws.gov>

Fri, May 25, 2018 at 10:40 AM

Having attended the Missoula public scoping meeting last August and reviewed the options in the recent Planning Update I'd like to offer my comments, based on my own knowledge of the Bison Range and my experience as a professional landscape architect.

I already expressed my positive views about the value of the Bison Range in my September 2017 comments to the FWS. I would, therefore, express my full support of **Alternative B**, as described in the Planning Update. As I stated last September it is critical for the success of the refuge to engage fully the support of the public. It is only then with this support that the FWS can seek the funds it needs to provide the upgrades necessary to adequately serve the public.

As a landscape architect I understand fully the important ecological role the refuge plays in the entire ecosystem. It is my hope, therefore, that by pursuing **Alternative B**, the other alternatives can also be implemented to the maximum possible extent. As a long range goal it is important, for example, that work continues on securing migration corridors that will provide meaningful connections to the various habitats within the Northwestern Montana ecosystem.

Sent from [Mail](#) for Windows 10



May 25, 2018
Ref: JW006-18

Bernardo Garza, Planning Team Leader
U.S. Fish and Wildlife Service
Branch of Planning and Policy
134 Union Boulevard, Suite 300
Lakewood, Colorado 80228

Dear Mr. Garza,

Thank you for the opportunity to comment on the USFWS's draft alternatives for future management of the National Bison Range Complex. These properties contribute to a significant conservation network of federal, tribal, state and private conservation lands here in northwest Montana. The draft vision and goals cover all the important attributes that the complex provides.

The draft alternatives also cover the most important benefits of these lands; public recreation, ecosystem sustainability, species conservation, and collaborative landscape connectivity. We believe that all these functions are important and hope that your final decision documents can integrate each of those concepts into a preferred alternative. Montana Fish, Wildlife & Parks has worked closely with USFWS staff to integrate the management of our land management and our conservation efforts to seamlessly fit with the larger Bison Range Complex. We look forward to working with them through this CCP process and into the future as you implement the plan.

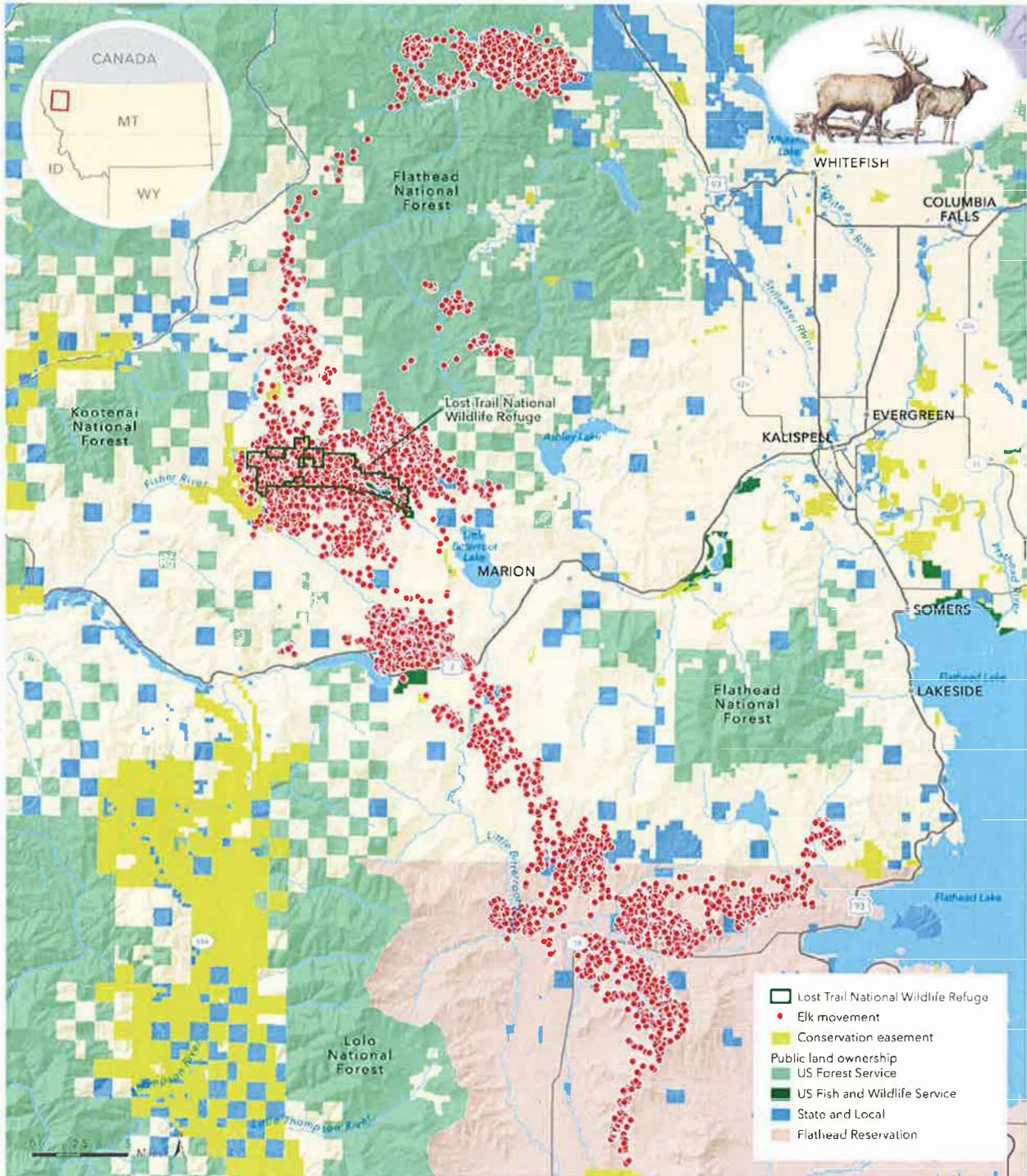
Additionally, Montana Fish, Wildlife and Parks would like to thank the Bison Range Complex for retention of all conservation lands in the unit. FWP has invested significant conservation funds adjacent to the North Shore Waterfowl Production Area and areas west of Kallispell near the Lost Trail National Wildlife Refuge, and we have plans to continue our conservation work in these important and popular areas. The Lost Trail area is important for many species including elk (see figure below).

Attached to this letter are specific comments on some of your proposed management goals that we hope will help you in finalizing your draft environmental documents. Please don't hesitate to contact me or any of my staff if you have any questions on this or other matters of joint interest.

Sincerely,



Jim Williams
Regional Supervisor



Migration corridors of elk marked on the Flathead Reservation by the Confederated Salish and Kootenai Tribes that summer on the Lost Trail NWR and surrounding Weyerhaeuser and public lands.

FLATHEAD COUNTY, MONTANA

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Comments on draft concepts and actions

Topic Area – Birds, Alternative B: consider expanding this action beyond distributing information to include construction of bird viewing platforms. The Flathead and Mission Valleys lie in an important migratory waterfowl corridor and few people are aware of the importance/magnitude of this annual event. Montana Fish, Wildlife & Parks (FWP) has three public viewing areas specifically for wildlife watching and new ones on Complex properties would add to this public education opportunity. This comment would also apply to your proposed Access/Facilities actions.

Topic Area – Other ungulate populations, all alternatives: Sustainable population levels are critical to meeting many of your other management goals. Your environmental documents should clearly outline what you consider those levels to be. Sustainability for closed populations (NBR) is very different from herds that can move freely across the landscape. FWP is ready and willing to work with you to manage population levels through our season-setting authority on the northern units of the Complex.

Topic Area – Other Wildlife and Plants, Alternative B: This alternative proposes to increase hunting opportunities as a management tool and does not seem to fit well under this action. It would fit better under “Other ungulate populations.”

Topic Area – Predators, all alternatives: Predator control is a very controversial topic and your proposed actions are sharply contrasting on the NBR and the other units of the Complex. You need to clearly explain the rationale for the contrasting approaches.

Topic Area – Wetlands/Riparian (Water Management): All alternatives focus on removing artificial structures and enhancing natural flowing water where possible. The habitat values on the Batavia WPA are dependent on management of artificial structures to manage water levels for wetland benefits. Seems like this approach may differ for lotic and lentic systems.

Topic Area – Fire: This section needs to be clarified. Why is restoring original fire regimes to the maximum extent possible important under Alternative B? How does fire threaten to damage bison under alternative C? What is “a wildlife corridor concept” and how does it apply to fire management under alternative E?

Topic Area – Water rights and management, Alternative A: The no action alternative calls for conducting water manipulation to the extent possible to benefit waterfowl/wildlife. This statement seems to conflict with the Alternative A language under Wetlands/Riparian (Water Management).

Topic Area – Fishing, Alternative C: This alternative suggests that you “minimize federal regulations that differ from state/Tribal regulations. Seems like this would fit better under the Collaborative/Partner-Based alternative rather than Ecological Sustainability.

Topic Area – Interpretation: Alternative B suggests that you would, “Examine opportunities with partners to develop new materials that emphasize the unique quality of resources on the Complex.” Seems like this approach would fit best under Alternative E or at the very least under both alternatives.

Topic Area – Access/Facilities, Alternative E: Consider adding working with partners to construct wildlife viewing platforms along the North Shore WPA. We have discussed this need and potential with your area staff and it would fit well with your language evaluating “the possibility a new viewing area along Highway 200

May 24, 2018

Comments submitted for: National Bison Range, Lost Trail NWR, Ninepipe NWR, Pablo NWR and the NW Montana Wetland Management District

(Historically named the National Bison Range Complex)

Submitted to:

Scoping_nbr@fws.gov

Scoping_pablo_ninepipe@fws.gov

Thank you for the opportunity to provide input on the development of the Comprehensive Conservation Plan (CCP) for the National Bison Range Complex (NBRC). Some of my comments may seem harsh, but I was part of the National Wildlife Refuge System for over 30 years and one third of that as the NBRC Project Leader. If I didn't care deeply about the integrity of the NWRS and the NBRC I would not bother to comment.

I have been disappointed in and appalled at how US Fish and Wildlife Service (USFWS) Region 6, USFWS leadership and the Department of Interior (DOI) have (over the past 10+ years) wreaked political, budgetary and staffing havoc on this iconic National Wildlife Refuge Complex. Politically motivated actions by tribal lackeys within the USFWS and DOI have served to appease a tribal government while undermining the integrity of five National Wildlife Refuges and the Northwest Montana Wetland Management District. I submit the following comments with the intent and hope that my input will be utilized to improve the Range of Management Alternatives recently issued.

The first problem that needs to be rectified is the lack of representation of any current or past permanent full time refuge manager on the planning team. The Planning Update issued in April 2018 indicates that USFWS regional leadership saw fit to appoint at least two team members advocating tribal priorities while allocating no membership to USFWS refuge managers (past or present) with any significant experience on any of the NBRC units. I wonder if similar CCP planning oversight occurred on any other refuge complex within Region 6?

It is a travesty to propose the so called "No Action" alternative that is presented here. The No Action alternative for every other CCP has been the *normal* operation of the Complex. The current operation of the NBRC has been anything but normal since Region 6 was forced by DOI political appointees into signing an Annual Funding Agreement (AFA) with the Confederated Salish and Kootenai Tribes (CSKT). As I recall, in 2004 the NBRC utilized approximately 20 Full Time Equivalent Staff (FTE's) with a budget of well over one million dollars in today's costs. I am told the current NBRC budget has been reduced by about two thirds from historic levels. Region 6 administrators should be ashamed of themselves for allowing such blatant neglect or intentional abandonment of refuge goals and maintenance. Now that FWS has been forced to comply with the planning requirements of the National Wildlife Refuge Administration Act (NWRSA) I am hopeful but doubtful they will at long last restore the NBRC to again become one of the most respected and visited National Wildlife Refuges in the NWRS.

The CCP team should be instructed to change the presented Alternative A “current management” conditions to those preceding the obvious strangulation of the complex which began after 2004. Should USFWS be unwilling to change the presented Alternative A, an additional alternative should be developed entitled “National Bison Range Complex Restoration”. There are many components of a restoration alternative scattered in the various alternatives in the Draft Range of Management Alternatives that prior to 2005 were “current management”. I am aware that few, if any, of the current staff are familiar with the pre-strangulation level of “current management”. However, there are transferred and retired NBRC staff still within Region 6 who can assist the planning team in fleshing out an accurate No Action alternative which represents true NBRC management prior to the damage done through political assassination.

Alternative B should be deleted because public use is *not* the legislated purpose of any of the units within the NBRC. All public use within the NBRC is legally mandated to be compatible with the purpose of each refuge unit, and then only if adequate funding is available. Funding should not be diverted from accomplishing the purpose of any NBRC unit to “maximize” public use. Considering how FWS Region 6 has starved the complex to the point of being unable to accomplish many of the units’ legally mandated purposes, it is ludicrous to propose maximizing public use.

Alternative E should also be eliminated as it is merely a simply-titled but thinly-veiled proposal to once again open the door to inappropriate and illegal involvement by the sovereign Confederated Salish and Kootenai Tribes. Region 6 administrators have starved the NBRC of resources (funding and staff) over the past 10+ years to such an extent the units cannot fulfill their legal mandates much less embark on “Landscape Level Conservation”. Much of what is listed in Alternative E was “current management” by refuge and Partners for Wildlife staff prior to Region 6 starving the NBRC to gain support for the now failed and illegal CSKT Annual Funding Agreement contract. Alternative E appears to be inspired by attempts to comingle refuge management with tribal management. By suggesting that bison management be “coordinated” with external groups *i.e.* the CSKT, the planning team may have forgotten the goal of NBR bison management is mandated in the NBR enabling legislation, making it an inherently federal function and not a suggestion. However, as the no action alternative should have addressed consultation with partners in the development of a new bison management plan is a normal management practice.

By introducing the subject of allowing “traditional hunting” by the planning team it is obvious they are referring to CSKT hunting bison on the NBR. It is my opinion that opening the NBR to hunting by tribal members only would violate federal law by allowing only one segment of the public this opportunity based on race. This move towards tribal hunting is the same concept proposed but rejected by a project leader several years ago at the National Elk Refuge. In the past, public comment has indicated overwhelming support for continuing the 110 year old tradition of *no* public hunting on the NBR.

“Establish an advisory team of partners” sounds like management by committee which has already proven impractical on other units of the NWRS. However, consultation with partners is always a good policy and should be included in an alternative that restores the NBRC to the pre-tribal Annual Funding Agreement staffing and inflation corrected-funding.

“Consider opportunities for bison to access areas that may be any available land neighboring Refuge lands”. USFWS should be honest and spell it out that what is being proposed is to put NBR bison on CSKT properties that border the NBR to the west and southeast of the NBR boundary. A partnership of this nature was proposed to the CSKT around 1996 by the then NBRC project leader, David Wiseman, but the CSKT declined to pursue the possibility.

“Incorporate lands outside USFWS property to maximize habitat capabilities at landscape scale”. How vague is this? What properties are being proposed and how? There is already an approved conservation easement program in place and an active Partners for Fish and Wildlife program, so this action should have been in alternative A and/or in an NBRC restoration alternative. If the team is referring to “landscape scale” for species such as wolves and grizzly bears, a NBRC meeting with FWS experts (Chris Serveen and Ed Bangs) for conservation of those species was held in approximately 2000. The consensus during that discussion was that it is not practical to encumber such large areas in NW Montana for such wide ranging species

When the CCP planning team proposes to move towards more sustainable levels of ungulates based on habitat conditions, it is unclear whether they are suggesting there are too many, or too few, for the habitat. It is unclear whether the CCP planning team is referring to only wild ungulates or domestic livestock as well. Again, this should already be proposed in Alternative A and should be in a NBRC restoration alternative. Maybe the team does not realize that the CSKT already allow members to kill ungulates at will in their traditional hunting areas which includes all the WPA's, Ninepipe NWR, Pablo NWR, and Lost Trail NWR. Only the NBR is totally exempt from this practice due to the NBR not being open to any public hunting. The NBRC consulted with the CSKT and MTFWP in the development of the Lost Trail hunting plan. If the CCP planning team is referring to tribal members' domestic livestock (ungulates) grazing on Pablo NWR and Ninepipe NWR, this activity is administered by the CSKT government in consultation with the NBRC. The CSKT have the right to utilize these two refuges so long as it does not interfere with the USFWS management for birds.

The team refers to working with other agencies regarding management of bull trout. Since the only significant NWRS property within the NBRC area with a notable population of bull trout is Swan River NWR, which is no longer administered by the NBRC, this seems like a rather irrelevant and unnecessary action.

I count the creation of 20 additional teams being proposed in the Draft of Management Alternatives. Maybe it is just me, but it seems ridiculous to require refuge management to create 20 additional groups. How many teams does CMR NWR and Benton Lake NWR oversee?

I am hopeful that the USFWS will restore the NBRC to its former position as a precious jewel of the NWRS. My wish is for this special and beloved refuge complex to recover its status as part of the “national network of lands.... for the benefit of present and future generations of Americans” as mandated by the National Wildlife Refuge Administration Act.



[EXTERNAL] National Bison Range Comments for CCP Planning Process

Tue, May 29, 2018 at 2:11 PM

To: Scobina nbr@fws.gov

Dear Vanessa,

We hope you will accept our comments for the Bison Range CCP planning process a day late. We had difficulty getting input and review over the holidays. We appreciate the opportunity to comment and participate in the ongoing development of the CCPs for both the Bison Range and the other lands in the Bison Range Complex. We are submitting comments for the other Bison Range Complex lands in a separate email to scoping_pablo_ninepipe@fws.gov.

Flathead Audubon Society is a non-profit chapter of the National Audubon Society with approximately 400 local members based in the Flathead Valley of northwest Montana. Over the years, we have worked with the Confederated Salish and Kootenai Tribes (CSKT), Montana Fish, Wildlife & Parks (MFWP), and the USFWS staff in both the Flathead and Lake Counties on many land acquisition, habitat restoration, and public access projects and we look forward to continuing and potentially expanding our collaboration. Our members are active birders in the Mission, Flathead, Smith, Swan, and Pleasant Valleys of northwest Montana. We provide a free K-12 conservation education program primarily in the Flathead Valley residents, but also offer field trips to the Mission Valleys to view wildlife on federal, tribal, and state lands and we collaborate with CSKT on several cultural educational events.

We reviewed the alternatives and various associated goals and encourage you to combine and organize them into a new proposed alternative consistent with your agency's stated purposes for the National Bison Range but reaching out a bit more into the communities and to other public and private nearby land ownerships. We focused our comments on first prioritizing the goals you provided in your Issue 1: *Planning Update: Draft Alternatives for Future Management to guide future management of the National Bison Range (April 2018)*, providing some revisions to the goals, and then turning some of the listed goals into strategies to meet these major goals. Please let us know if you need any other information.

Thank you for the opportunity to provide input into this important process.

Sincerely,

Gael Bissell

Vice President

Flathead Audubon Society

Flathead Audubon Society's Comments on the Proposed National Bison Range Prioritized Goals for EIS/CCP:

1. Ecological Mgt vs Species/Wildlife or Ecosystem Mgt: Protect, maintain, and restore healthy and diverse wildlife populations with respect to species that are endemic, migratory, and mandated species of concern (e.g. bison, various native plants, etc.)

Or possibly better yet,

"Provide ecologically sustainable, healthy and diverse wildlife populations on the Bison Range lands that allows connectivity and genetic interchange between units, particularly for species that are endemic, migratory, and mandated species of concern (e.g. bison, various native plants, etc)."

To meet this goal, include strategies such as:

- a. **Habitat Management** (Conserve, restore, and promote biological integrity in functional and sustainable ecologically of these species' diverse habitats of the inter-montane ecosystem of western Montana);
 - b. **Invasive Spp:** (Prevent, reduce, and contain the invasion and spread of noxious, invasive, and harmful nonnative species within the **Bison Range** while working with partners to address off-**Bison Range** infestations within the surrounding landscape);
 - c. **Increase Collaboration and Partnerships:** *Work collaboratively with adjoining private and public landowners to reduce threats of invasive species, extend habitat values across private/public lands to other protected landscapes.*
- 2. Cultural Resources:** Preserve and value the **Native American** cultural resources and **pre-Columbian** history of **the region that are relevant in the Bison Range context.** *Suggested strategies include:*
- a. Collaborate with the Confederated Salish and Kootenai Tribes and other Tribal governments in a manner consistent with the Service's Native American policy and with other Federal, State, and local government entities in a manner consistent with applicable Service policies.
 - b. *Provide specific cultural programs at the Bison Range from children's through adult educational activities that give the historical perspectives and context for this unique area and its unique history.*
 - c. Connect staff, visitors, and community to the area's past and **the more recent** continuing traditions that help achieve the vision and supporting goals and objectives of the National Bison Range.
- 3. Public Education/Use:** Provide **compatible**, wildlife-dependent recreational and **educational** opportunities for persons of all abilities, consistent with sustainable wildlife management, that facilitates learning, enjoyment, and appreciation of the inter-montane landscape of western Montana, the fish, invertebrates, \wildlife and plants. *(Do this through Collaboration and Partnerships to identify compatible public use needs and strategies).*
- 4. Administration and Operations:** Effectively use **and increase** funding, **for** staff, partnerships, volunteers, and equipment to restore and manage Complex habitats, conduct programs, and improve and maintain all necessary infrastructures to the benefit of the Complex and the Refuge System. *(Do this through Collaboration and Partnerships to identify ways to improve staffing, budget, systems, etc.).*
- 5. Research and Science:** Encourage high quality research and promote the use of scientifically sound management decisions. *(Do this through Collaboration and Partnerships to identify research and science needs).*
- 6. Monitoring and Adaptive Management:** Through the life of this plan, we will monitor and evaluate the consequences of our actions and use adaptive management to reach desired outcomes. *(Do this through Collaboration and Partnerships to best means for monitoring and evaluating USFWS programs successes).*

I have these few comments regarding development of your CCP:

1. For alternatives, I believe the focus species on the "Range" are Bison, Antelope, and Bighorn Sheep. Conceptually this was determined at the onset and documented clearly by Morton Elrod just following the turn of the last century during his assessment of this location for the Bison Range for the American Bison Society. The wildlife focus alternative and the last (Landscape Mgt with partners) makes sense to combine. First the remaining animal populations migrate on and off the Range and are dependent on neighboring habitats, as well as others for seasonal use (winter range). Because the full range of animal species is enjoyed by the public, the sanctuary provided by the Range allows animals to wander into public view. So the association of the Range habitats and outside habitats are inextricably linked. These two alternatives should be combined.

2. Funding for the Range to incorporate more natural processes into management, specifically use of fire, needs to be a priority. Although it has long been identified as a need, funding has been absent to support this kind of management. The Range overall suffers because of it with increased tree encroachment into grasslands, as well as promoting older plants and less diversity through natural changes. Forest in-growth has been a continuum since the very early 1900 and the forested areas suffer from a host of issues stemming from lack of change, lack of fire, and increased insect and disease effects (dwarf mistletoe and armillaria root rot).

3. Noxious weeds are an issue. I think we as a public and land managers have to realize this is an impossible task to eradicate noxious weeds in the long term. The Bison Range is surrounded by major travel ways that transport weed seed, agriculture land that support cows and weeds. Seed will never be eliminated under the current lack of policy that identifies noxious weeds as detriment to productivity in the private agricultural sector as well as management of public lands. Whatever selected alternative is going to be the basis of management for the Range, there does need to be strong statements of impacts from weeds, and what the realistic goals for weed management are. Purely maintenance of the grasslands without exceptional gains until a comprehensive approach is taken off the Range as well. Weed management currently can restrict use of natural processes like prescribed fire. This is mitigation, not a management action that necessarily benefits the resource.

4. Tree encroachment into grasslands has occurred since 1900 and has progressed with some management to restrict it from further movement into available grass for Bison. NBR management plans address "encroachment" as an expansion of the forest perimeters. This has occurred and will continue, however it occurred and will into the future at a relatively slow progression. The overall occupation of grasslands has been relatively minor considering no management of it for the last 100 years. The greatest impacts are caused by "in-growth" of trees into forested stands and have prompted population explosions of disease, primarily in Douglas-fir (mistletoe and root rot). This is the natural way to promote change, which will be large and sudden, and non-selective for leaving desirable trees following the change by fire.

Understory and middle stories of the original forested stands are now progressing toward this kind of change.

The forest resource on the "Range" is part of the original proposal; however it was recognize only as a resource to provide materials for building infrastructure to display and pasture Bison. Today, if we look at the surrounding landscapes, NBR supports one of the few original inherited stands of old growth ponderosa pine. Everywhere else old growth pine has been harvested and managed toward younger, faster growing stands for financial profit. NBR now houses some of the remaining links to the past and the genetic code from the past. It is however coexisting with over-crowded understory's, unprecedented levels of litter and duff, and developing survival systems that will not survive fire intensities produced by the levels of surface and aerial fuels.

I am recommending ponderosa pine become an index species that is identified in management plans as a manageable and desirable species on NBR. Efforts to add years to the existing old growth should be recognized and a field action taken to promote the old growth and manage understory development of pine as it naturally was pre-1900. Initial actions will be labor intensive and expensive due to amounts of tree "in-growth", and surface fuel accumulations. The goal should include moving toward a prescribed fire program that uses aerial ignition and affect blocks of 1000-2000 acres at a time. This will allow easy block management throughout NBR, as well as promote the most economical means to create natural processes.

You must also create a realization of what exists now and what it will turn into in the near future. You have extensive areas of Douglas-fir that is visible to the viewing public. These stands are riddled with disease and can be seen today in the active dynamic of falling apart structurally, promoting disease, and moving rapidly toward the dramatic change agent of intense fire. The impacts are public safety, employee safety, and animal management. The 1935 fire is an example of potential, except since then there has been 73 more years of developing available fuels.

5. Mission Creek is another good example of forest succession. Western juniper has almost totally excluded Cottonwood. The water table undoubtedly has also been affected because we know how prolific juniper is at drafting and transpiring water. Trying to gain some understanding of what Mission Creek might have look like during the mid-1800 would go a long way toward understanding what has occurred to get the conditions today. It is a huge draw to animals during the summer for seasonal feeding and thermal cover; and in the fall for during the rut. There is a large draw from professional photographers to capture the ceremony of deer, elk, and antelope here. I suspect the juniper is a result of no tree management, but the area has been affected by grazing from cows and the Allard bison herd up to forming NBR and fencing. Juniper is very tolerant, and Cottonwood very intolerant. Cottonwood supports more cavity nesting birds and mammals than any other riparian tree species we have. So to the exclusion of Cottonwoods, so has been the species and populations of what likely used to inhabit this area.

Comments for National Bison Range CCP Development

I recommend a look at juniper to identify the ingrowth of the species, identify a period that could be restored by removing juniper, creating tree habitat for Cottonwood and use “in-planting” of Cottonwood seedlings to begin another riparian stand that could be dominated by Cottonwoods and managed to maintain it. Removing juniper encourages a higher water table and more favorable conditions for Cottonwood and associated riparian shrubs and forbs.

6. Lastly I will suggest that all of the known tribal references to landmarks and locations on NBR be re-instated. Signs can provide both the reference locations by name as determined by NBR at its beginning, and the native designations in their language with an interpretation. This can be highlighted by providing the public brochures with native spelling, and perhaps a phonetic spelling. American Indians lived here and co-existed with this landscape; you cannot determine management schemes without acknowledging the influence and affects caused by tribes. Their perspectives and actions helped provide the landscape so attractive to Morton Elrod for locating the NBR. Their culture has been sorely lacking USFWS descriptions of natural processes here at NBR and 9-Pipes. This is a good period to return the emphasis what things used to be, how we reached this point today, and how will you incorporate processes from the past to make it good again.