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M. Jeff Hagener, Director
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Jeff:

I appreciate you continuing to answer my letters, even though I continue to have concerns regarding the range resource on the Northern Range (winter range) which includes the Dome Mountain Game Range.

I am glad you are participating in the "research proposal". I was not aware of that. I had understood, from whom I assume is the lead researcher from MSU, that the Forest Service was funding his work. Perhaps two different studies are proposed. I have met with a MSU representative twice. He had asked for my help in supplying him with the needed technical guidance material developed by USDA-Natural Resources Conservation Service (NRCS) and other references, including the data I have developed. He left me with the impression that he was planning to conduct a traditional range inventory, much as NRCS would do it. I will be very much interested in the results.

What is so striking throughout the Northern Range is that so little plant litter is being left on the soil surface. When litter is encountered in the transects on sites monitored for several years during the 1990's within the Northern Range by NRCS, and read by my technical support team in 2014, when litter exists, 80% or there about is fecal litter. Litter quantities ranged 0 to 300 pounds when during the 1990's the litter amount from all sites averaged about 1,000 pounds. I have walked miles and seen little plant litter. That alone tells me the trend in range condition is down.

The information cited above has been provided to Harrington except for the 2014 data. I will provide him with the 2014 data soon. My technical team, of volunteers, and me have also completed soil health analysis on the NRCS sites measured in 2014 as prescribed in the interagency publication "Interpreting Indicators of Rangeland Health, Technical Reference 1734-6", produced by USDI-Bureau of Land Management (BLM). I had suggested to Sally Jewel that she send the BLM authors of the report to Yellowstone National Park (YNP) to conduct an evaluation. No response. Ideally much of the problem could be solved within USDI.

The moose saga was done mostly in jest to "stimulate" Pat. But, there is a message. Your efforts to balance wildlife numbers with resource conditions and mitigating impacts to private property are wanting. The moose situation is just another example. I live in a subdivision of small tracts which is bordered by a conservation easement of several thousand acres posted with abundant no hunting and no trespassing signs. The next time I have four moose in the

yard at once I will call you. Your agency can dart them and haul them off and give the problem to someone else. You do it for bears. I know, budgets, staff, etc., etc. But, if millions were not being spent on the effort to introduce bison to the plains of Montana, budget constraints would not be as much of a problem, I suspect.

I am well aware of the services provided by the county extension offices. Their service is not usually one of inventory, just providing information. NRCS will inventory and develop a plan. But, they do not do long term monitoring. That responsibility rests with the land owner and that includes wildlife. My point to you was that you need to more actively participate in the monitoring activity on private land **and your land**. Monitoring, perhaps, would buy the hunter more access to private land and you more control over wildlife populations. I hope you appreciate the impact your inability to control wildlife populations can have on ranchers and the impact on the range resource. As I have said before, primary responsibility for monitoring wildlife habitat (range) seems to rest with the private land owner. In addition he is expected to provide an unspecified amount of forage to meet his undefined obligations to the greater society. I think ranchers are reacting to this situation, in part, out of frustration. Many are seeking compensating income through outfitters, thereby, limiting access for the "traditional" hunter.

My partner, Frank Rigler, who demonstrated to me the seriousness of the problem on the winter range, has said that the Cooperative Extension Service State Range Specialist told him he could not run both cows and elk on his place, so he sold to MFWP. Frank asked for a formal assessment from NRCS about five years ago on property near his home to confirm what he was seeing. He thought the trend in range condition was down. No domestic livestock had been on the property in 15 years. That assessment did indicate trend was down: no plant litter, little sign of dominant species native to the site reproducing, plant pedestals, similarity index 30. That assessment was the catalyst for Frank to call me. And, being familiar with the range situation, since my days attending UM Forestry School, I said I would volunteer some time.

MFWP owns a piece of land behind Rigler's home and it is not fenced separate from his property. We have examined that piece. It is in as poor, if not marginally poorer ecological condition, than Frank's (similarity index 30). Have you ever examined that piece? There is also a piece of state land that is part of the Dome Mountain Ranch we have examined, similarity index is 30.

Are you over extended to the point you do not have the ability to monitor and assure effective management of state land and indirectly private land? I see the need for activities such as **effective weed control at fishing access sites, state parks, game ranges. By encouraging people to use such areas, they are concentrated and they pick up seed and create a nuisance elsewhere.** The worst example I have encountered is Bean Lake and Willow Creek Reservoir near Augusta, MT. I had always wanted to fish Bean Lake as I had driven by it many times while working on the Glacier County, Pondera County Soil Survey in the 1960's and seen fishermen there. I finally got there a couple of years ago. Bean Lake had become a weed patch as well as the surrounding area. I then moved to Willow Creek Reservoir. Fence down around campground, cows and cow shit everywhere, and profuse spotted knapweed growing. **Spotted knapweed at Dailey Lake should be a concern. It appears to be spreading. Just a few examples.** Maybe you should pull back, eliminate some services/management activities so that you can do a quality job elsewhere.

Should bison introduction to the Montana plains wait until you demonstrate effective management of existing responsibilities? Has the issue of adding bison to the lands outside YNP increased your work load, perhaps at the expense of other activities? I would really like to know what is driving this bison range expansion. Legislators of whom I have asked that question, do not seem to know. I sent documentation to Governor Sweitzer (a fellow soil scientist) several years expressing my concern relative to conditions on the YNP portions of the winter range and expressing my concern regarding the increasing bison load. No direct response. I did get a call about two years later from his natural resource advisor. We visited for two hours and he agreed with my assessment of what was going on in YNP. But, when I told him I did not think bison would "fit" outside YNP, he lost interest in continuing the discussion.

I think that the ungulate load on grazing lands beyond the Northern Range in Montana is at or above capacity as well. Any introduction of bison anywhere, should determine if the statement above is true, and if so, adjustments made in other ungulate populations to compensate for the addition of bison. I do not want to see another Northern Range "situation". I base that statement on discussions I have had with range scientists recently working to accelerate range management on Montana prairie lands critical to the survival of the greater sage grouse. And, I have recently completed a range inventory of 20,000 acres of American Prairie Foundation controlled land (much similarity 30 index land). I have worked on the Blackfeet, Crow and Northern Cheyenne Reservations. I was team leader for a range inventory of the entire Northern Cheyenne Reservation in about 1992 and 1993 as well as providing guidance and inventory assistance to NRCS staff in western and southwestern MT. So, I think I have some basis for the highlighted statement.

One could reasonably wonder if public land managing agencies can effectively manage bison, in Montana at least. By my math there is about 52,500 animal unit months of bison foraging on the Northern Range. The total carrying capacity as estimated by the USDA-Soil Conservation Service at the request of YNP management in 1963 was about the same number for all ungulates using the winter range at that time. It shows! I recently visited the National Bison Range (NBR). I was astounded to observe St. Johnswort the dominant forb over thousands of acres. In about 1969, I returned to Missoula, MT to initiate a soil survey in cooperation with Anaconda Forest Products. Visiting with the Professor of Range Management within the School of Forestry (a friend), I volunteered to describe the soils at selected sites on the NBR. He had selected the NBR as the site for describing the rough fescue grassland vegetation type. This was his contribution to the International Biome Study, the purpose of which was to describe the major "pristine" vegetation types around the world. The NBR would not qualify today.

I asked in the previous letter how you arrived at your Elk Population Objectives. You did not provide an answer. That is OK. A technical support team volunteer is curious and will be working with MFWP to understand the process.

Enough carrying on! I will be most interested in the results of the MSU Northern Range analysis. Again, I appreciate the investment in time you have taken to respond to my letters. Do not feel the need to respond to this letter. Save time for other chores. I will continue to monitor the situation. A primary objective is to get YNP management to admit they have a problem and then to begin to take corrective action (public reeducation, changes in legislation, aggressive animal number reduction, etc. etc).

POST NOTE. I was asked by a Park County, MT County Commissioner to attend the Interagency Bison Management Tour, which was yesterday, Nov.19. The previous evening, I was preparing for the tour. I had recently read about the bison release to the Fort Peck Tribes. So, I did a little "creative math project" in preparation for the tour to assess the impact of the bison on the range resource. Using a similarity index of 30, clayey range site and 10"-14" precipitation zone, I estimated the bison demand to be 3,366 animal unit months (AUM). Based on the rate of 6.7 acres (A) per AUM, that would require 22,522 acres if the animals uniformly utilize the pasture to maintain a similarity index of 30. Present pasture size is 13,000 A. My estimate for 1,000 head, their target number was 120,600 acres. I called a technical support team member who has spent much time in the area. He said he thought I should have used a carrying capacity figure of 0.2 rather than 0.15 animal unit months per acre. The point still remains, is there room for bison on the Montana Plains without the adjustment of other ungulate numbers? It will really get interesting when we decide the bison are not good for the greater sage grouse that agencies are promoting improved range management in order to keep them from being listed and threatened or endangered.

I told that person that, I had received your latest letter and that you had not addressed the process for setting elk number objectives. I also told him that, at that time, I had just included in this letter a statement that he would be contacting you. He said he had already sorted the process out. And, the target number had little to do with what the actual carrying capacity of the management unit was. The number was more what the members of the panel setting the target thought the public would tolerate. He had already completed the task.

2nd enough carrying on!

Sincerely,

Harold E. Hunter