Montana Fish, Wildlife & Parks

4600 Giant Springs Rd.
Great Falls, MT 59405
March 20, 2012

Dear Interested Party:

This letter is to notify you that I have made a decision regarding Montana Fish, Wildlife & Parks (MFWP) implementation of grazing lease and/or renewal on the Beartooth Wildlife Management Area (BTWMA). My decision is to move forward with the proposed action. The lease will allow the removal of current vegetation by grazing as a management tool to enhance the subsequent availability and palatability of fall and spring forage on that portion of the BTWMA described in the Environmental Assessment and a Draft Grazing Management Plan.

No modifications were made in the documents you received/reviewed after the public review period. Please consider your previous copies of the Environmental Assessment and Draft Management Plan along with the stipulations of this Decision Notice as final.

Comments received regarding the Beartooth Wildlife Management Area Proposal are summarized in the enclosed Decision Notice. No changes have been made to the draft Environmental Analysis after consideration of public input. It is my recommendation to move forward with the proposed grazing system lease renewal on the Beartooth Wildlife Management Area.

Thank you very much for your interest and involvement.

Sincerely,

Gary Bertellotti
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DECISION NOTICE

BEARTOOTH WILDLIFE MANAGEMENT AREA
"Polloch Meadows" Grazing Renewal

PROPOSAL
The proposal is to seasonally graze a portion of the Beartooth Wildlife Management Area (BTWMA), locally known as "Polloch Meadows". This six year grazing system consists of 2 pastures (approximately 450 and 400 acres) located near upper Cottonwood Creek within the BTWMA.

MONTANA ENVIRONMENTAL POLICY ACT PROCESS
FWP is required to assess impacts to the human and physical environment under the Montana Environmental Policy Act (MEPA). The Beartooth Wildlife Management Area Grazing Proposal and its effects were documented by FWP in an Environmental Assessment.

A 21-day public comment period ran from February 24 through March 15, 2012. Public notices of the draft Polloch Meadows Grazing Proposal and Environmental Assessment were placed on the FWP web site and were announced in a news release to the area and statewide newspaper outlets. Hard copies were available at the FWP Region 4 office in Great Falls, and were offered via mail at request.

SUMMARY OF PUBLIC COMMENTS
Solicitation of public input resulted in receipt of 4 comments. Comments were received as 1 letter and 3 e-mail responses. These 4 responses came from 2 organized groups (Gallatin Wildlife Association and Russell Country Sportsmen Association) with the remainder from 2 private individuals. Following are questions and salient points made in those responses with added FWP response (*in italics*):

1) The EA mentions "various areas within the WMA" contain stands of introduced brome and timothy grass (p. 1), whereas other areas support native grasses (p. 2). There is no indication of how much land is in introduced vs. native vegetation within the two portions of the WMA that are the subject of this EA. Are most of these introduced grasses in old hay meadows? If so, we suggest the FWP consider eliminating the exotic plants and reseed the area to native plants such as basin wildrye, slender wheatgrass and native forbs adapted to the site. *Approximately 200 of the 450 acres in the main "Polloch Meadows" pasture was, at one time (prior to FWP's purchase), utilized as tame pasture consisting of mainly smooth brome. To address smooth brome (primarily palatability issues), grazing is the preferred management option due to the logistics of getting equipment to the site (5 miles up Cottonwood Creek via 2 track, 20 miles from Craig/Wolf Creek area) to properly reseed the area to native vegetation. The 2nd pasture in the proposed renewal is located near upper Cottonwood Creek Headwaters, all of which is native vegetation.*

2) Although the pastures proposed for continued and new grazing seem to be primarily along Cottonwood Creek, there is no mention of any woody or other riparian plant species in the EA. We find it hard to presume there is no riparian vegetation that may be relatively unusual on the WMA, and we note that livestock impacts are most likely to occur in riparian areas. What is the historical presence of beaver in the riparian areas and can beaver be restored? Beaver dams will help restore the floodplain and riparian vegetation and perhaps go a long ways to removing the non-native vegetation in the old hay meadows depending on how water floods the area. *Riparian plant species along Cottonwood Creek include (but not limited to): timothy, orchard grass, Oregon redtop, numerous sedge species, bluegrass,*

wild rose, chokecherry, red dogwood, willow, hawthorn, black cottonwood, quaking aspen, river birch, Rocky Mountain maple, cattail and mock orange. Beaver activity is present throughout the Cottonwood, Elkhorn and Willow Creek drainages on the WMA. Although beaver activity is welcomed on the WMA, beaver are not considered a "management tool" to remove non-native vegetation in the old hay meadows.

3) The EA claims that use of the WMA by private livestock will "alleviate grazing pressure on adjacent private land riparian areas" (pp.2, 4). There is no explanation of the nature or magnitude of this benefit. Furthermore, it is the neighboring landowner's responsibility to take care of his land. Would the FWP allow some sub-division on the WMA to prevent too much sub-division on adjacent private lands? If FWP feels a need to influence the productivity of neighboring private lands we suggest FWP enter into a conservation easement or offer to acquire the property if it is for sale. We have no confidence FWP will properly regulate the use of neighboring private land in exchange for private livestock use of the WMA. *Utilizing a larger pasture (lessee and BTWMA) in the Upper Cottonwood area will allow cattle to disperse thus reducing impacts to the riparian area of Cottonwood Creek. Existing conditions of riparian habitats on the adjacent private lands is in very good range health. Allowing cattle to utilize the adjacent BWTWM pasture will benefit FWP lands by improving forage conditions on the WMA while reducing cattle use of the riparian habitats of the adjacent private lands. Cottonwood Creek has recently been stocked and managed for Westslope Cutthroat trout (BTWMA and Sieben Live Stock). Maintaining and/or enhancing riparian habitat along Cottonwood Creek will benefit not only fisheries, but also big game, water dependent wildlife and non-game species alike.*

4) The EA repeatedly states that removing "decadent" vegetation will benefit many wildlife species, including non-game. This assertion is unsupported by any data, literature review, or even by systematically collected observations. The reference to "nongame" is especially vague and sounds like "window dressing." What is the difference between dense nesting cover and decadent vegetation? Again, if decadent vegetation is a problem, please consider the use of prescribed fire as an alternative to private livestock use. It is important to note in the EA that domestic cattle prefer green vegetation over dry and leaves over stems, so how will FWP get the cows to eat decadent vegetation without eating all the preferred wildlife forage first? *Cattle utilization for vegetation management can be accomplished through temporary electric fencing within pasture systems and through water and salt/mineral placement. Salt and mineral placement is also key in forcing cattle to utilize areas. This has successfully been accomplished on the WMA grazing systems since the early 1990's.*

5) The EA states there are permanent fences in place to implement the grazing program. There is no indication of how much permanent fencing must be kept in place for this purpose. We do not support any internal fences or water diversions into livestock water tanks within the WMA. How many miles of internal fences are there? How many water developments are proposed and where will the water come from? What benefit do these fences and water diversions for livestock have for native wildlife on the WMA? *There will be no new permanent fences needed to implement the grazing system. Temporary electric fence will be utilized to create pasture boundaries where needed. This temporary electric fence is installed only 2-3 days prior to grazing and removed within 3 days after the cattle are removed. No water developments are needed to implement the proposed grazing system.*

6) Under the unlikely heading of "Aesthetics" the EA mentions that "other portions" of the WMA have been and are grazed by livestock since 1996 (p. 5). While a "Cow Camp Pasture" is noted on the maps,

there is no mention of this pasture in the EA text. We are left at a loss to judge the cumulative affects of this WMA grazing program. Has FWP been making or losing money administering livestock use on this WMA? Please reveal the costs and benefits of this livestock use since 1996 in the EA. What is the State lease rate as compared to the private land lease rate per AUM? *FWP has received approximately $151,550 in grazing fees for the "cow camp" pasture lease and $13,150 in fees for the previous "Polloch Meadows" grazing lease. The FWP rate charged in this lease will be the same as the DNRC rate = $7.90. The BTWMA rate charged takes into consideration factors such as: providing livestock in numbers capable of achieving desired results, lessee being required to maintain permanent fence, install and remove temporary fence to implement the system, move cattle when plant phenology dictates to achieve FWP goals of habitat management, and to install and maintain watering facilities required to implement the system.*

7.) A few of the supporting public comments were as follows:
-I am in support of renewing the BTWMA Graze with Sieben Live Stock. If the areas are not being used by the native wildlife due to overgrowth it should be grazed to allow for new growth which will benefit all the wildlife in those areas.

-After reviewing the grazing data for the Beartooth WMA, I feel the grazing of cattle has proven to be a very important and productive program in the WMA habitat management. As a sportsman I feel this will add to the hunting opportunity for elk and deer in the Beartooth.

-Russell Country has been involved with the Devil's Kitchen since it's inception and thus the Beartooth WMA as well, along with other sportsmen, Backcountry Horseman, F.S., F W & P, DNRC , ranchers, outfitters and local residents. I can assure you that this WMA is very , very well managed and any and all management and operating decisions are brought to the Devil's Kitchen's group for discussion , input and suggestions. And I mean EVERYTHING! Hunting, fire, grazing, timber, water, fish, hay, roads, travel, access, camping, habitat, wildlife fencing and anything else that has an impact. Sportsmen and a wide range of user's and interested groups and individuals do lot's of volunteer work up there , like rolling up old wire from when it was a private ranch. Public involvement and participation are key to all that happens on the Beartooth and the Dept. does a very good job of seeing that that continues. – Russell Country Sportsmen Association

MONITORING COMMENTS RELATED TO BTWMA:

1.) Sieben Live Stock and Beartooth WMA Rangeland Health Monitoring
Prepared by Todd Graham, Ranch Advisory Partners, LLC
Beartooth Game Range Transect T9:
This transect was established on July 25, 2011. The site was chosen in the Game Range not far from the Beartooth/#9 gate in an open meadow that was representative of the area. Most of the points on the Rangeland Target fell within the gold area, but some indicators fell within the silverNo signs of erosion or plant pedestaling were observed. Within the successional process, the percent desired plants was high. Some lesser-desired species like Kentucky bluegrass and timothy were prominent, but desired fescues, needlegrasses, and mountain brome were present and in abundance. No noxious weeds were present at this site. Different age classes of desired bunchgrasses were evident on the soil surface, suggesting the different needlegrasses and fescues were increasing their presence in the community. This was a positive sign. Further, with 31 plant species found here, diversity was high. Energy flow was high at this site. A robust plant canopy was found (see the quadrat photo), and plant vigor was high. Plants were also well distributed across the soil surface, with the exception of those gaps. Most sunlight energy was intercepted by living plant leaves rather than striking the soil surface where it was lost. The basal cover pie chart depicts the balance of live plant cover, litter cover, and bare soil. At 4% bare, this number was acceptable, but management's goal should be to reduce bare ground to less than 1%. The basal cover by species bar graph depicts the seven most abundant perennial plants found on the soil surface. Note the low percentage

contribution of each of these species (especially as compared with the other sites like White Tail where Kentucky was 63%). No one plant species dominated this site, which was a positive finding. Further, plants like the fescues, Columbia needlegrass, the rush, and the aster were desired species, and they composed much of the community. These were positive findings, and their close percentages display strong diversity in this plant community. The average distance to the nearest perennial plant was 0.7 inches, which was abit high for this area. As a 20+ inch precipitation zone, this site should display tighter plant spacing, and that figure should ideally drop to about 0.5 inches. Forage production was high at 3320 pounds per acre. NRCS classified this site as a Silty 20+ ecological site whose average year potential production was 2245. Given the wet year of 2011, this site easily surpassed its average year potential. The composition by weight table shows the top five most productive plants as measured by weight. The three forbs (geranium, lupine, and meadowrue) were all desired species that should produce greatly in wet years like 2011. The timothy was a less-desired grass, and shrubby cinquefoil was a less-desired shrub. Ideally, more perennial bunchgrasses like fescues, wheatgrasses, wildryes, oatgrasses, and needlegrasses would be seen on this list to replace timothy and cinquefoil. *Management recommendations:* The data presented above portray a site of high rangeland health. The water cycle was effective, the mineral cycle was rapid, successional complexity was high, and energy flow was high.

2.) **Large WMA Pasture in Grazing System with Chase Hibbard by FWP Range Specialist Mike Frisina:** "In 2005 2006 we visited this pasture to assess how the area in responding to the grazing system. My impression is the pasture is doing quite well. There is a good diversity of vegetation exhibiting excellent vigor. Riparian areas that were obviously severely impacted historically are now healing. One can see many places that were obviously raw banks several years ago that are now covered with vegetation. There is also a good diversity of willow and other woody species growing along water courses. In some places the woody species are noticeably browsed. While I think the health of woody species generally looks good, maybe we should take a closer look at the impacts of browsing through a landscape level survey of the pasture. **Polloch Meadows Grazing System -** It was nice to see the plan we devised last year implemented. The area looked like I hoped it would following grazing. Due to the fact that we have some native vegetation in the area and a stream, I think it best that we stick with our existing grazing strategy. I think we achieved about as much regrowth as could be expected considering the timing of grazing. I really appreciate being able to visit the WMA with you and think you are doing an excellent job of managing the area."

FROM: Mike Frisina

SUBJECT: 2009 Field Tour of the Beartooth WMA (R4).

On July 1, 2009 Cory Loecker and I visited the Beartooth WMA to check on range conditions and look at recent range improvements associated with livestock grazing systems on the WMA. Following are notes resulting from the visit:

1. We toured Polloch meadows and the Big Pasture. The Big Pasture is one pasture in grazing rotation that includes a portion of Chase Hibbard's ranch.

2. The big pasture was scheduled for rest from grazing in 2009 and looks very good in terms of ground cover and vegetation production. This pasture has a very pronounced floral diversity and is very productive. The grazing system is working well and productivity of the pasture is being maintained.

3. During the inspection we visited aspen enclosures and water developments (tanks) in the big pasture. The aspen enclosures were built because the aspen/riparian areas are near a very important water source and due to topography the riparian/aspen areas are favored cattle loafing sites. When in the pasture, cattle have a history of camping on these sites near water for the entire grazing period and causing intensive use of the area. The building of the enclosures to fence out cattle, yet still allowing cattle use of the nearby water tank is working well. I have visited these sites several times over the past 3-years and at each visit strong improvements in the woody plant community are noted. Photos are on file.

4. The Polloch Meadows area is grazed 2 out of 3 years with a full rest period once every three years. Grazing is targeted at smooth brome plantings that dominate the meadow. The meadows are maintaining their productivity and the grazing system is working well.

STIPULATION OF THIS RECORD OF DECISION DOCUMENT
None.

MODIFICATIONS TO ENVIRONMENTAL ANALYSIS AND MANAGEMENT PLAN
No modifications to the EA or the Management Plan are recommended.

DECISION

Utilizing the Environmental Analysis, Management Plan and public comment, a decision must be rendered by FWP that addresses the interests and issues identified for this proposed project. Given results of FWP's analysis coupled with the nature of the public comment, acceptance of this grazing proposal on the Beartooth Wildlife Management Area is warranted. After review of this proposal and the corresponding public support and comment, it is my recommendation that FWP proceed with the grazing proposal of Polloch Meadows on the Beartooth Wildlife Management Area.

Signed,

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BTWMA EA Decision Notice Mailing List

Gallatin Wildlife Federation - Glenn Hockett

Russell Country Sportsmen Association – John Borgreen

Tom McElroy - Sportsman

Jeremy Garness – Sportsman