



Montana Fish, Wildlife & Parks

**DECISION NOTICE for the Draft Environmental Assessment:
Isaac Homestead WMA Grazing Lease
Region 7 Headquarters
PO Box 1630, Miles City, MT 59301
(406) 234-0900**

DESCRIPTION OF PROPOSED ACTION:

The Isaac Homestead WMA was purchased by Montana Fish, Wildlife, & Parks (MFWP) to provide hunting opportunities while also maintaining wildlife populations and the unique riparian ecosystem in a viable and healthy condition. The pastures in the proposed project area currently contain stands of rank, minimally productive vegetation that is too thick to provide ideal nesting and brood rearing habitat for pheasants and other bird species. The proposed action is to temporarily allow grazing during the winter season (Jan 15 – Mar 15), when usage of the WMA is at its lowest. Grazing will allow plants to restore vigor and seedlings to establish. The result will be healthy plant communities that are diverse, provide excellent nesting and brood rearing cover for birds, and improved forage for a variety of wildlife species.

ALTERNATIVE TO PROPOSED ACTION:

Alternative A: No Action

- Decadent residual vegetation would remain.
- White-tailed deer and pheasant habitat would remain sub-optimal.
- Continued decline in vegetation quality and wildlife habitat functionality.

Alternative B: Haying or mowing under existing sharecropper agreements:

- Mowing and haying can result in direct mortality of birds and destruction of nests.
- Mowing is time-consuming, costly, and would result in significant litter deposition that may limit bird use and take several years to break down.
- Mowing would result in thick litter that might inhibit vegetation growth, reestablishment, and might promote establishment of undesirable plant species.

Alternative C: Proposed Action: Provide grazing lease.

- Soil and plant disturbance would reduce decadent residual vegetation and benefit plant seedling establishment.
- Management would promote maximum plant production, vigor and nutrient content.
- Provide better spring green-up vegetation conditions for white tailed deer.

- Provide better nesting and brood rearing cover for pheasants.
- Some segments of the general public may disapprove of cattle grazing on the WMA.
- Grazing the WMA as a management tool would facilitate positive relationships with local ranchers.

PUBLIC REVIEW PROCESS:

FWP is required by the Montana Environmental Policy Act (MEPA) to assess potential impacts of its proposed actions to the human and physical environments, evaluate those impacts through an interdisciplinary approach, including public input, and make a decision based on this information. MFWP released a draft environmental assessment (EA) for public review of this proposal (Isaac Homestead Wildlife Management Area Grazing Lease) on February 7, 2013 and accepted public comment until 5:00 P. M. on February 28, 2013.

Legal notice of the proposal and availability of the draft EA was published in the *Miles City Star* and the *Forsyth Independent Press*. Copies of the environmental assessment were distributed to neighboring landowners and interested individuals, groups, and agencies to ensure their knowledge of the proposed project. The EA was available for public review on MFWP's web site (<http://fwp.mt.gov/>, "Recent Public Notices" and "Submit Public Comments") from February 7, 2013 through February 28, 2013. An MFWP statewide news release was issued February 7, 2013 and posted on FWP's website (<http://fwp.mt.gov/>, "News Releases") the same day.

SUMMARY OF PUBLIC COMMENT

MFWP received 5 total comments from 4 individuals. One individual submitted identical comments twice. Of the 4, 1 expressed support for the proposed alternative and 3 expressed opposition in addition to requesting clarification of the intent and justification for the proposed project.

Three commenters expressed concern that grazing would result in degraded habitat through the removal of grass or shrub hiding cover. One commenter expressed concerns about weed control, two expressed concerns that ungrazed habitat is limiting on the landscape, and 1 expressed financial/monetary concerns. All comments can be viewed in their entirety in Appendix A.

RESPONSE TO PUBLIC COMMENT

Below is a summary of comments and FWP responses. Similar comments from different parties were grouped together. (Comment numbers correspond to the numbering of the individual commenters and paragraphs in Appendix A.)

Comments 1a.

The idea that we should be manipulating vegetation to promote a common and abundant species such as whitetail deer seems absurd to me.

First the management goal of increasing vegetation suitable for whitetail deer and pheasant seems to ignore the fact that both of these species, whitetail in particular, are not rare or in dire

need of population increases. And cattle grazing while it may benefit pheasant (although hiding cover is often the limiting factor for pheasant) is likely to have a negative impact on native species. Should MDFWP be favoring abundant (whitetail) and exotic species (pheasant) over native species? As the EA acknowledges, most of the private land in this area is grazed by livestock, and such such grazed habitat is not rare in the region. The EA fails to take a regional perspective on the need for livestock disturbed habitat.

By contrast, ungrazed habitat is far rarer in this region, and species that depend on non-grazed landscapes are at a disadvantage.

FWP Response: The WMA was purchased and is managed using monies provided by sportsmen through hunting license sales and Pittman-Robertson funds. The primary management goal of the WMA is to provide hunting opportunity, primarily for white-tailed deer and pheasants. Therefore it is appropriate to manage for abundant (whitetail) and exotic (pheasant) species because they are favored game species among sportsmen. Although the WMA is managed primarily to provide opportunity for sportsmen, a variety of other game and nongame species benefit from the existence and management of the WMA. The EA proposes a one-time prescriptive treatment to be conducted over just 60 days, rather than a grazing plan that will continue in perpetuity and therefore is not directly comparable to grazed habitat in the surrounding landscape. As the commenter suggests, many wildlife species depend ungrazed areas. Many species, including pheasants, also require productive early-successional grasslands to thrive. The proposed grazing plan will provide ungrazed areas annually while simultaneously promoting vegetation vigor and diversity.

Comment 1b.

The EA uses pejorative language demonstrating a lack of ecological knowledge. "Cattle grazing will remove the existing buildup of decadent vegetation"

"Decadent" is the same way foresters refer to "old growth" forests. There are many species of wildlife (wildlife is more than whitetail deer) that are dependent on vegetation that is dense and thick. There are numerous lichen, fungi, insects, and other species that require such vegetation.

FWP Response: The proposed project area consists of extremely converted habitats (rather than pristine "old growth" as the commenter suggests), most of which were historically plowed and planted to crop for decades prior to being converted to dense nesting cover. The commenter is correct that foresters often use the term "decadent" to describe old growth forests. However, upland game bird biologists use the term "decadent" to refer to grasslands that are in decline or no longer maximizing potential. When crops and dense nesting cover fields are planted to benefit upland game birds, they must be periodically maintained (hayed, disked, grazed, etc.) in order to maintain vegetative productivity over long periods of time. Currently, exotic grass species are trying to encroach and eliminate native species and dense nesting cover in the proposed project area. Of particular concern is smooth brome, an exotic species that is poor-quality nesting habitat for most grassland birds. Brome encroachment is occurring throughout the proposed project area and the species is widespread in the surrounding landscape. One intended benefit of the proposed

grazing treatment is to set back encroaching exotic species such as smooth brome. Disturbance will promote vegetative species diversity, which has declined in recent years in the proposed project area.

Comment 1c.

The EA just asserts that grazing will benefit whitetail and pheasant. Even one agreed with this assertion, the EA makes no attempt to quantify how many more deer or pheasant might result from this risky vegetation manipulation. Will we see two more deer? Hundreds? Is it worth the risk that grazing may have on the land and other species?

FWP Response: It is impossible to accurately predict numbers of whitetail deer and pheasants that may result from the proposed project because annual survival and reproduction for both species are highly dependent upon weather events. Whitetail numbers are also controlled by disease, particularly EHD (Epizootic Hemorrhagic Disease) and BTV (Bluetongue Virus) outbreaks. The whitetail population along the Yellowstone River was reduced in 2011 due to a severe EHD outbreak. Maximizing the potential of vegetation on the WMA will allow for maximum health of wildlife populations: improved vegetation due to grazing could result in better nutrition, higher fawning rates, better overwinter survival, and a much faster rebound for whitetail deer. For pheasants, increased nest success and brood survival have the potential to significantly bolster populations and hunting opportunity for sportsmen.

Comment 1d.

The EA basically ignores most wildlife. Wildlife is more than whitetail deer. What species of, bees, butterflies, birds, rodents, etc. might use and require non-grazed habitat. For instance, there are many native bee species that nest in the ground. How will grazing affect these species? What species are even here? How about hiding cover for small mammals, and other species? If you remove this "dense" vegetation, you make these species more vulnerable.

FWP Response: A complete list of nongame species that may occur on the parcel is available from the Montana Natural Heritage Program Tracker online at <http://mtnhp.org/tracker/NHTMap.aspx>. The short duration of the proposed project and within WMA fencing will retain dense hiding cover in ungrazed areas. Diverse age stands are expected to be beneficial for numerous species that require dense hiding cover for nesting and/or security but productive areas with abundant green vegetation, forbs, and invertebrates for forage/brood rearing.

*Ground nesting bees include primarily mining bees (*Andrena* spp.), bumble bees (*Bombus* spp.), and long horned bees (*Melissodes* spp.). Disturbance provided by grazing should promote greater numbers and diversity of forb species, which would provide a direct positive benefit for a variety of bee species. While overgrazing can degrade bee habitat, careful and well-timed cattle grazing can improve bee habitat (source: Carvell, C. 2002. Habitat use and conservation of bumblebees [*Bombus* spp.] under different grassland management regimes. *Biological Conservation* 103:33-49).*

Comment 1e.

Second, while the document acknowledges that grazing might spread weeds, the solution is to spray herbicides. Is this the way to manage weeds? Weeds are a major threat to all wildlife. And livestock are well known as one of the major vectors for the spread of weed. Furthermore, the disturbance of soil and removal of "dense" vegetation opens up the landscape to colonization by weeds. So the grazing goals are likely to facilitate the establishment of weeds.

Comment 1f.

Third, the real costs of this threat are not given full consideration. We may be treating this area forever if an aggressive weed species is established. We are going to take this risk to provide slightly better forage for whitetail deer?

FWP Response: FWP works with the Treasure County Weed District to manage weeds on the property, and this relationship will continue within the project area. Potential establishment of additional weeds is minor, given the brief duration of the proposed project and the prescribed frequency of livestock movement around the WMA. Furthermore, it would not be cost-efficient for a producer to ship cattle long distances to graze the WMA. Therefore, it is likely that only nearby landowners will be interested in the contract and the likelihood of introducing a weed that wasn't already present in the local area is very limited. Livestock grazing can potentially spread weeds. Wind, water, humans, domestic animals, wildlife and vehicles can also spread weeds. Weed monitoring and management will be necessary in the proposed project area regardless of livestock presence. The presence of cattle is not expected to unreasonably increase the risk of noxious weed establishment within the proposed project area.

Comment 1g.

Fourth, the EA makes light of water pollution resulting from grazing, justifying the pollution by saying that cattle are polluting the rest of the river. I find that a poor justification for even more pollution.

FWP Response: The only source of water for livestock will be located on off the WMA on an adjacent property. Cattle will not stray far from their only known water source and thus, its unlikely that cattle will be near the Yellowstone river. Irrigation ditches do occur in the project area, but pollution of these is unlikely because they have raised sides and feces should not run off into the water. Livestock will not have access to irrigation ditches because the ditches have steep slopes and deep channels that might endanger cattle. Even if cattle feces were to enter the ditches it would not pose a threat to natural ecosystems or human health given that the water is used for irrigation of farm fields.

Comment 1h.

Fifth, the EA suggests that the costs of fences and other maintenance is going to be carried by MDFWP yet it is not articulated. In the absence of livestock grazing, there would be no need for fencing and so forth.

FWP Response: Fences are already present on the WMA and the cost of maintaining them is shared between FWP and neighboring property owners. Furthermore, Montana is a “fence out” state indicating the neighbor wishing to keep cattle off his property is responsible for erecting a fence.

Comment 1i.

Sixth, the EA suggests that "hoof action" will benefit the soils. Numerous studies have documented that hoof action from livestock has a detrimental impact upon soils. By compacting soils, the active layer where the majority of soil microbes are found, is compressed, leaving less habitat for these species which are responsible for breaking down vegetation. In addition compaction reduces water infiltration which may have detrimental impacts on plant communities.

FWP Response: Hoof action during grazing can break up soils, stomp seeds into soil, and provide microsities that hold water for seedling establishment. Rest periods facilitate soil building and minimize compaction. Improved root structures with rotational grazing also improve the soil (McCarthy 2003).

Comment 1j.

Seventh, although I am not certain that any vegetation manipulation is needed, if one were to advocate for this kind of manipulation, wildfire may be a better choice. The EA does not consider using fire to remove dense vegetation. Prescribed burning has some benefits that livestock grazing does not. Fire is not selective. Cattle tend to graze favorable plants, leaving behind the less palatable species--often these are weedy species. Fire also rejuvenates vegetation and would achieve the desired vegetation management, but without having to maintain fences, and risk the introduction of weeds. Fire also does not compact the soil as with livestock, nor pollute the water.

FWP Response: Wildfire is not a viable option at this location for several reasons. First, burning the area as a whole would remove any and all cover for resident wildlife, and given the area's small size, burning individual portions would be impractical (e.g., requiring the installation of burn breaks that would result in destruction of a significant proportion of the habitat within the proposed project area). Second, it may be difficult to get a fire to carry prior to the nesting season. Third, burning during late spring/early summer could result in loss of nests, brood, or hen mortality. Fourth, burning later may be impossible due to burn bans and risk of fire spreading to neighboring properties. Fifth, late burns also could promote further encroachment of brome. Sixth, burns in Eastern Montana can be unpredictable and difficult to control. Seventh, fire could remove fences and other barriers that allow FWP to keep neighboring cattle off of the WMA. Eighth, burning can have unintended negative consequences on soil (e.g., if the fire is sufficiently hot to burn down to mineral soils). Post-fire erosion can also be a major concern for soil and water quality. Ninth, weed establishment can be a significant problem in areas cleared by fire.

Comment 1k.

In summary, ungrazed landscapes are in much shorter supply in eastern Montana. That MDFWP would jeopardize such habitat to facilitate the slight increase in production of whiletail deer or pheasant seems foolish.

I believe the EA is inadequate and is full of unquestioned assumptions. I suggest the Dept. do a full EIS at a minimum so that the full costs of this action can be considered.

FWP Response: An EIS is not warranted for this action. No significant impacts to the physical and human environment will result due to the proposed action alternative, nor will there be significant public controversy over the proposed action; therefore, an EIS is not required.

Comment 2a.

I support Alternative C - Provide grazing lease on the Isaac Homestead Wildlife Management Area. This proposed action will improve the habitat more then Alternative B, with less or no conflicts with wildlife. Winter grazing has the least impact of most management tools, and most of the time has great benefits!!!!

FWP Response: This comment is in support of the proposed action and no response is needed.

Comment 3a.

Mr. Banfield, if this WMA was purchased to provide hunting opportunities, those would be best filled by not allowing cattle grazing on the land. Not only will the cattle compete for forage that would better feed winter pregnant deer, but the cattle destroy vegetation and especially destroy riparian areas, making them barren mud holes. Also, haying does not benefit wildlife. So please, manage this Wildlife Management Area for wildlife, not ag/livestock and apply No Action.

FWP Response: Cattle are grazers and unlikely to compete with deer, a browsing species. Given the short time frame that cattle will be present on the WMA they are not expected to have detrimental effects on riparian areas. Allowing pastures to remain undisturbed will ultimately result in monotypic stands of exotic grasses. Provided some disturbance through winter grazing will increase vegetative diversity and results in increase forb and legume species, benefitting nesting and brooding pheasants.

Comment 4a.

Please accept my comments on the Issac Homestead grazing lease. I also wish to be included in comments received from the Gallatin Wildlife Association. These comments are in addition to those previously submitted by the GWA.

The purpose of the lease is to remove decadent vegetation to promote new growth and vegetative diversity. This is to be accomplished by livestock grazing from 1/15-3/15. Presently, 195 acres within the WMA are irrigated cropland. Much of the remaining land is grazed on a rest rotation system. Vegetation consists of cereal grains and hay on the farmed parcels, with cottonwood, aspen and shrub understory along the river bottom.

This WMA was Initially purchased in 1969, with additional purchases in 1970 and 1973. White-tailed deer, upland gamebirds, furbearers, and numerous small mammals are present year-round; mule deer and antelope are seen occasionally. Canada geese, mallards, wood ducks, and mourning doves nest on the WMA, while 16 other species of waterfowl, some shorebirds, raptors and about 100 species of songbirds can be found through much of the year. It appears that wildlife diversity is not an issue nor the vegetation conditions necessary to support that diversity.

The above information and the maps that I include with my letter show that this WMA is heavily impacted by agriculture and livestock grazing. This area does not need to have the livestock lease enlarged to include 1/15-3/15.

FWP Response: The commenter is incorrect in stating that much of the area is managed under a rest-rotation grazing system and that the WMA is heavily impacted by livestock. Grazing has not occurred on the WMA in over 7 years.

Comment 4b.

This EA does not include any climate change or drought management objectives. This is needed. I am enclosing maps that show the area to be in extreme drought now and also last summer and fall. These maps are from The Palmer Drought Severity Index, devised in 1965, was the first drought indicator to assess moisture status comprehensively. It uses temperature and precipitation data to calculate water supply and demand, incorporates soil moisture, and is considered most effective for unirrigated cropland. It primarily reflects long-term drought and has been used extensively to initiate drought relief. It is more complex than the SPI and the Drought Monitor. The Palmer Drought Severity Index is an important climatological tool for evaluating the scope severity and frequency of prolonged periods of abnormally dry or wet weather. It can be used to help delineate disaster areas and indicate the availability of irrigation water supplies, reservoir levels, range condition, amount of stock water, and potential intensity of forest fires. (National weather Service-Climate Prediction Center)

The cottonwood, aspen and shrub understory along the river is described in P. Hansen's book that is on the reference page as a Cottonwood Gallery Ecosystem. His publication lists the shrub components of that ecosystem, these were not mentioned in the EA. The importance of this ecosystem for wildlife cannot be underestimated, and must be protected. Mr. Hansen's work describes the effects of livestock grazing in these ecosystems. The effects of winter grazing on woody plants can be substantial.

Comment 4c.

Winter grazing in riparian areas is problematic. Will the permittee be there every day to monitor? What if livestock don't like the dead grass and go to where the protein is-shrubs? Will they be immediately removed if they utilize more than dry grass?

Comment 4d.

The AUMs have yet to be determined using the DNRC stocking rate. It seems to me that it would be very difficult to determine a winter stocking rate based on dry grass. I understand that

this is a one year contract, but in essence, it appears to turn this WMA into a year round grazing system. This area is too important to wildlife, please, no winter grazing.

FWP Response: The only water source for grazing livestock will be located off the WMA on an adjacent property. Cattle will not stray far from their only known water source, and considered collectively with the relatively short duration of the proposed project (60 days) the likelihood of cattle being in close proximity to cottonwoods or riparian areas for an extended period is extremely low.

Winter grazing is common on private land surrounding the WMA. These cattle are accustomed to consuming dead grass and as known grazers are not expected to browse woody shrubs. The number of AUMs will be based upon vegetation quality, growing conditions, and discretion of the lessee and area wildlife biologist. Thus, if the area biologist determines that grazing livestock are negatively impacting vegetation (woody or otherwise) or if drought conditions occur grazing could be reduced or eliminated.

The WMA will not be grazed year round. The EA states that grazing will be permitted from Jan 15 – Mar 15.

DECISION NOTICE

Utilizing the EA and public comment, a decision must be rendered by FWP which addresses the concerns and issues identified for this proposed action.

FWP's analysis supports the agricultural lease of Isaac Homestead WMA as proposed. I find there to be no significant impacts on the human and physical environments associated with this project. Therefore, I conclude that the Environmental Assessment is the appropriate level of analysis, and that an Environmental Impact Statement is not required.

After review of this proposal, it is my decision to accept the draft EA as supplemented by this Decision Notice as final, and to recommend the continuation of the grazing lease for Isaac Homestead WMA.

The Final EA may be viewed on FWP's Internet website: <http://www.fwp.mt.gov> or be obtained upon request from Montana Fish, Wildlife and Parks, Region 7 Headquarters, P.O. Box 1630, Miles City, Mt. 59301 (406) 234-0900.



Brad Schmitz
R7 Regional Supervisor

March 13, 2013

Date

**APPENDIX A
PUBLIC COMMENTS – ISAAC HOMESTEAD WMA GRAZING LEASE
FEBRUARY 7-28, 2013**

Comment #	Comment
1	<p>Dear Mr. Banfield:</p> <p>I am writing to oppose the proposal to graze 675 acres of the Issac Homestead WMA. The major justification appears to be to reduce dense vegetation to improve habitat for whitetail deer and pheasant--an exotic species. It is my view that the EA underestimates the long term impacts of livestock grazing, and potentially jeopardizes the long term wildlife value of the WMA.</p>
a	<p>The idea that we should be manipulating vegetation to promote a common and abundant species such as whitetail deer seems absurd to me.</p> <p>First the management goal of increasing vegetation suitable for whitetail deer and pheasant seems to ignore the fact that both of these species, whitetail in particular, are not rare or in dire need of population increases. And cattle grazing while it may benefit pheasant (although hiding cover is often the limiting factor for pheasant) is likely to have a negative impact on native species. Should MDFWP be favoring abundant (whitetail) and exotic species (pheasant) over native species? As the EA acknowledges, most of the private land in this area is grazed by livestock, and such such grazed habitat is not rare in the region. The EA fails to take a regional perspective on the need for livestock disturbed habitat.</p> <p>By contrast, ungrazed habitat is far rarer in this region, and species that depend on non-grazed landscapes are at a disadvantage.</p>
b	<p>The EA uses pejorative language demonstrating a lack of ecological knowledge. "Cattle grazing will remove the existing buildup of decadent vegetation"</p> <p>"Decadent" is the same way foresters refer to "old growth" forests. There are many species of wildlife (wildlife is more than whitetail deer) that are dependent on vegetation that is dense and thick. There are numerous lichen, fungi, insects, and other species that require such vegetation.</p>
c	<p>The EA just asserts that grazing will benefit whitetail and pheasant. Even one agreed with this assertion, the EA makes no attempt to quantify how many more deer or pheasant might result from this risky vegetation manipulation. Will we see two more deer? Hundreds? Is it worth the risk that grazing may have on the land and other species?</p>
d	<p>The EA basically ignores most wildlife. Wildlife is more than whitetail deer. What species of, bees, butterflies, birds, rodents, etc. might use and require non-grazed habitat. For</p>

	instance, there are many native bee species that nest in the ground. How will grazing affect these species? What species are even here? How about hiding cover for small mammals, and other species? If you remove this "dense" vegetation, you make these species more vulnerable.
e	Second, while the document acknowledges that grazing might spread weeds, the solution is to spray herbicides. Is this the way to manage weeds? Weeds are a major threat to all wildlife. And livestock are well known as one of the major vectors for the spread of weed. Furthermore, the disturbance of soil and removal of "dense" vegetation opens up the landscape to colonization by weeds. So the grazing goals are likely to facilitate the establishment of weeds.
f	Third, the real costs of this threat are not given full consideration. We may be treating this area forever if an aggressive weed species is established. We are going to take this risk to provide slightly better forage for whitetail deer?
g	Fourth, the EA makes light of water pollution resulting from grazing, justifying the pollution by saying that cattle are polluting the rest of the river. I find that a poor justification for even more pollution.
h	Fifth, the EA suggests that the costs of fences and other maintenance is going to be carried by MDFWP yet it is not articulated. In the absence of livestock grazing, there would be no need for fencing and so forth.
i	Sixth, the EA suggests that "hoof action" will benefit the soils. Numerous studies have documented that hoof action from livestock has a detrimental impact upon soils. By compacting soils, the active layer where the majority of soil microbes are found, is compressed, leaving less habitat for these species which are responsible for breaking down vegetation. In addition compaction reduces water infiltration which may have detrimental impacts on plant communities.
j	Seventh, although I am not certain that any vegetation manipulation is needed, if one were to advocate for this kind of manipulation, wildfire may be a better choice. the EA does not consider using fire to remove dense vegetation. Prescribed burning has some benefits that livestock grazing does not. Fire is not selective. Cattle tend to graze favorable plants, leaving behind the less palatable species--often these are weedy species. Fire also rejuvenates vegetation and would achieve the desired vegetation management, but without having to maintain fences, and risk the introduction of weeds. Fire also does not compact the soil as with livestock, nor pollute the water.
k	In summary, ungrazed landscapes are in much shorter supply in eastern Montana. That MDFWP would jeopardize such habitat to facilitate the slight increase in production of whiletail deer or pheasant seems foolish. I believe the EA is inadequate and is full of unquestioned assumptions. I suggest the Dept.

		<p>do a full EIS at a minimum so that the full costs of this action can be considered.</p> <p>George Wuerthner POB 5163 Helena, Montana 59607</p>
2		<p>From: Bert Otis To: Banfield, Jeremy Subject: Isaac Homestead Wildlife Management Area Date: Monday, February 11, 2013 7:14:52 AM</p> <p>Dear Fish Wildlife & Parks Commission,</p>
	a	<p>I support Alternative C - Provide grazing lease on the Isaac Homestead Wildlife Management Area. This proposed action will improve the habitat more then Alternative B, with less or no conflicts with wildlife. Winter grazing has the least impact of most management tools, and most of the time has great benefits!!!!</p> <p>Thank You Bert Otis PO Box 60 Emigrant, MT 59027 otisranch@wispwest.net</p>
3		<p>From: katqanna@gmail.com To: Banfield, Jeremy Subject: Public Comment: Isaac Homestead Wildlife Management Area Proposed Grazing Lease EA Date: Tuesday, February 19, 2013 9:52:16 PM</p>
	a	<p>Mr. Banfield, if this WMA was purchased to provide hunting opportunities, those would be best filled by not allowing cattle grazing on the land. Not only will the cattle compete for forage that would better feed winter pregnant deer, but the cattle destroy vegetation and especially destroy riparian areas, making them barren mud holes. Also, haying does not benefit wildlife. So please, manage this Wildlife Management Area for wildlife, not ag/livestock and apply No Action.</p> <p>Kathryn QannaYahu</p>
4		<p>February 20, 2013</p> <p>Montana Fish, Wildlife & Parks P. O. Box 428 Forsyth, MT 59327 jbanfield@mt.gov</p> <p>Subject: Comments on Draft EA for the Isaac Homestead WMA Grazing Lease</p>
	a	<p>Please accept my comments on the Issac Homestead grazing lease. I also wish to be included in comments received from the Gallatin Wildlife Association. These comments are in addition to those previously submitted by the GWA.</p>

		<p>The purpose of the lease is to remove decadent vegetation to promote new growth and vegetative diversity. This is to be accomplished by livestock grazing from 1/15-3/15. Presently, 195 acres within the WMA are irrigated cropland. Much of the remaining land is grazed on a rest rotation system. Vegetation consists of cereal grains and hay on the farmed parcels, with cottonwood, aspen and shrub understory along the river bottom.</p> <p>This WMA was Initially purchased in 1969, with additional purchases in 1970 and 1973. White-tailed deer, upland gamebirds, furbearers, and numerous small mammals are present year-round; mule deer and antelope are seen occasionally. Canada geese, mallards, wood ducks, and mourning doves nest on the WMA, while 16 other species of waterfowl, some shorebirds, raptors and about 100 species of songbirds can be found through much of the year. It appears that wildlife diversity is not an issue nor the vegetation conditions necessary to support that diversity.</p> <p>The above information and the maps that I include with my letter show that this WMA is heavily impacted by agriculture and livestock grazing. This area does not need to have the livestock lease enlarged to include 1/15-3/15.</p>
	b	<p>This EA does not include any climate change or drought management objectives. This is needed. I am enclosing maps that show the area to be in extreme drought now and also last summer and fall. These maps are from The Palmer Drought Severity Index, devised in 1965, was the first drought indicator to assess moisture status comprehensively. It uses temperature and precipitation data to calculate water supply and demand, incorporates soil moisture, and is considered most effective for unirrigated cropland. It primarily reflects long-term drought and has been used extensively to initiate drought relief. It is more complex than the SPI and the Drought Monitor. The Palmer Drought Severity Index is an important climatological tool for evaluating the scope severity and frequency of prolonged periods of abnormally dry or wet weather. It can be used to help delineate disaster areas and indicate the availability of irrigation water supplies, reservoir levels, range condition, amount of stock water, and potential intensity of forest fires. (National weather Service-Climate Prediction Center)</p> <p>The cottonwood, aspen and shrub understory along the river is described in P. Hansen's book that is on the reference page as a Cottonwood Gallery Ecosystem. His publication lists the shrub components of that ecosystem, these were not mentioned in the EA. The importance of this ecosystem for wildlife cannot be underestimated, and must be protected. Mr. Hansen's work describes the effects of livestock grazing in these ecosystems. The effects of winter grazing on woody plants can be substantial.</p>
	c	<p>Winter grazing in riparian areas is problematic. Will the permittee be there every day to monitor? What if livestock don't like the dead grass and go to where the protein is-shrubs? Will they be immediately removed if they utilize more than dry grass?</p>
	d	<p>The AUMs have yet to be determined using the DNRC stocking rate. It seems to me that it would be very difficult to determine a winter stocking rate based on dry grass. I understand that this is a one year contract, but in essence, it appears to turn this WMA into a year round grazing system. This area is too important to wildlife, please, no winter grazing.</p>

	<p>Thank you for accepting my comments. Nancy Schultz 420 N. 10th Ave Bozeman, MT 59715 nancyanaconda@msn.com</p>
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