



Montana Fish, Wildlife & Parks

1400 South 19th Avenue
Bozeman, MT 59718

March 18, 2011

To: Governor's Office, Mike Volesky, State Capitol, Room 204, P.O. Box 200801, Helena, MT 59620-0801
Environmental Quality Council, State Capitol, Room 106, P.O. Box 201704, Helena, MT 59620-1704
Dept. of Environmental Quality, Metcalf Building, P.O. Box 200901, Helena, MT 59620-0901
Dept. of Natural Resources & Conservation, P.O. Box 201601, Helena, MT 59620-1601
Montana Fish, Wildlife & Parks:

Director's Office	Parks Division	Lands Section	FWP Commissioners
Fisheries Bureau	Legal Unit	Wildlife Bureau	Design & Construction

MT Historical Society, State Historic Preservation Office, P.O. Box 201202, Helena, MT 59620
MT State Parks Association, P.O. Box 699, Billings, MT 59103
MT State Library, 1515 E. Sixth Ave., P.O. Box 201800, Helena, MT 59620
Silver Bow County Commissioners, 155 West Granite, Butte, MT 59701
Deer Lodge County Commissioners, 800 South Main, Anaconda, MT 59711
Beaverhead County Commissioners, 2 South Pacific St. STE #4, Dillon, MT 59725
James Jensen, Montana Environmental Information Center, P.O. Box 1184, Helena, MT 59624
Janet Ellis, Montana Audubon Council, P.O. Box 595, Helena, MT 59624
George Ochenski, P.O. Box 689, Helena, MT 59624
Jerry DiMarco, P.O. Box 1571, Bozeman, MT 59771
Bob Raney, 212 South 6th, Livingston, MT 59047
Montana Wildlife Federation, P.O. Box 1175, Helena, MT 59624
Wayne Hurst, P.O. Box 728, Libby, MT 59923
Glenn Hockett, Gallatin Wildlife Association, 745 Doane Road, Bozeman, MT 59715
Tom Sathers, Headwaters Fish & Game Association, P.O. Box 1941, Bozeman, MT 59771-1941
John Gatchell, Montana Wilderness Association, P.O. Box 635, Helena, MT 59624
William Fairhurst, Public Lands Access Association, P.O. Box 247, Three Forks, MT 59752
Skyline Sportsman Association, P.O. Box 173, Butte, MT 59701
Anaconda Sportsman Club, #2 Cherry, Anaconda, MT 59711
Jefferson Valley Sportsman Association, Don Drake, PO Box 255, Whitehall, MT 59759
State Land Coalition, Jack Atcheson President, 3210 Ottawa Street, Butte, MT 59701
State Land Coalition, Jack Jones, Vice President, 3014 Irene Street, Butte, MT 59701
Bill Tash, 1200 Hwy 178, Dillon, MT 59725
Janet Krivacek, U.S. Forest Service, 1820 Meadowlark Lane, Butte, MT 59701
Russ Reibe, U.S. Forest Service, PO Box 100, Wise River, MT 59762
Scott Haight, BLM, 106 N. Parkmont, Butte, MT
George Grant Chapter of TU, PO Box 563, Butte, MT 59703
Allen Schallenberger, 53 Elser Lane, Sheridan, MT 59749-9604
Phil and Sonny Ralston, 54289 Highway 43, Wise River, MT 59762
Clyde Thompson, 170 Meadow Road, Divide, MT 59727
Dennis Bacon, 64 Barney Lane, Twin Bridges, MT 59754

Ladies and Gentlemen:

The enclosed Decision Notice proposes to renew the Mount Haggin Wildlife Management Area-South grazing lease for a 10-year term. The renewed lease would allow three current local livestock producers (Clyde Thompson, Bacon Ranch, and Ralston) to continue their usage, as well as increase an exchange of use agreement for the Ralston Ranch. This lease is part of a cooperative grazing program between Fish, Wildlife, & Parks, the U.S. Forest Service, and Bureau of Land Management.

Contingent upon increasing usage by the Ralston Ranch, the following will occur:

- The overall permitted grazing use on Mount Haggin WMA will decrease by 48%.
- The Ralston Ranch will enroll approximately 2,600 acres in a 15-year Upland Game Bird Habitat Enhancement Program contract.
- The Ralston Ranch will relinquish two grazing permits on USFS land. The USFS will not fill these permits behind the Ralston Ranch. This action will ultimately improve 5,200 acres of rangeland through reduced livestock use.
- The Upland Game Bird contract will facilitate a rest-rotation grazing system for the Ralston Ranch's Candidate Conservation Agreement with Assurances 10-year agreement plan for Big Hole Arctic Grayling.

Full implementation of this proposal will positively affect 29,811 acres, 25 streams and 64 stream miles across state, federal, and private lands for the benefit of fish, wildlife, and the recreating public.

Of the five respondents, four stated direct support for Alternative A; the fifth respondent stated that he generally opposes livestock use of Wildlife Management Areas, but since the Department appears committed to doing so on Mount Haggin WMA, he asks that the Department considers his comments and incorporates his ideas into the planning process.

The Decision Notice may also be obtained from FWP at the address provided above, or viewed on FWP's Internet website: <http://www.fwp.mt.gov>.

It is my decision to proceed with Alternative A: Renewal of the Mount Haggin WMA-South grazing lease with an increase in AUM's for the Ralston Ranch, as detailed in the Mount Haggin WMA-South Grazing Lease Environmental Assessment.

Questions regarding this Decision Notice should be mailed to:

Fish, Wildlife & Parks
Vanna Boccadori
1820 Meadowlark Lane
Butte, MT 59701

Or e-mailed to: vboccadori@mt.gov.

Sincerely,

A handwritten signature in black ink, appearing to read 'Patrick J. Flowers', with a large, stylized flourish at the end.

Patrick J. Flowers
Region Three Supervisor
Attachment



Montana Fish, Wildlife & Parks

ENVIRONMENTAL ASSESSMENT DECISION NOTICE for the Mount Haggin WMA-South Grazing Lease Renewal

**Montana Fish, Wildlife & Parks
Region 3, Bozeman
March 2011**

Preface

The enclosed Decision Notice has been prepared to maintain a cooperative rest-rotation grazing program on the Mount Haggin WMA-South grazing system for a 10-year term to extend June 2011 through October 2020. The decision allows for the current usage of fee grazing (total 321 Animal Units/1,191 Animal Unit Months) for three local livestock producers (Clyde Thompson 141 AU/523AUM; Bacon Ranch 130AU/482AUM; and Ralston Ranch 50AU/186AUM). In addition, the decision allows for an increase of use by the Ralston Ranch by an additional 178 AU/658 AUM through an exchange of use agreement. This brings the total livestock use on the Mount Haggin WMA-South grazing system to 499 Animal Units and 1,846 Animal Unit Months.

The grazing lease is part of a cooperative grazing program with the U.S. Forest Service and Bureau of Land Management, which began in 1989. The proposed grazing program would encompass 12,091 acres owned by FWP, 6,847 acres administered by the USFS, and 909 acres administered by the BLM.

Contingent upon increasing usage by the Ralston Ranch, the following will occur:

- There will be an overall decrease in the permitted grazing use on Mount Haggin WMA. In 2007, a separate Mount Haggin WMA grazing lease (Mount Haggin WMA-North lease, held by the Willow Glen Ranch) that allowed 640 AU/2,560 AUM of use was terminated and left unfilled. With this proposal, 178 AU/659 AUM of that usage will be filled, plus the 321 AU/1,188 AUM already allowed. Total permitted usage on Mount Haggin WMA-South with the additional use by the Ralston Ranch will represent an overall reduction by 48% of recent use (i.e. 499 AU/1,846 AUM versus 961 AU/ 3,556 AUM).
- In lieu of payment to FWP for the increased grazing use, the Ralston Ranch will enroll approximately 2,600 acres of deeded ground in a 15-year Upland Game Bird Habitat Enhancement Program (UGBHEP) contract. Terms of this contract will include a rest-

rotation grazing system applied to deeded ground and the associated BLM Deep Creek allotment (2,600 acres), reduced stocking rates, and 50-80 hunter days. The last five years of the UGBHEP contract will be contingent upon renewal of the Mount Haggin WMA-South grazing lease in 2020. The area affected by this contract comprises mountain grouse habitat, primarily for dusky (blue) grouse. In addition, it also serves as elk winter range during years of less severe winters. In 2010, this area wintered 100-130 head of elk. Total affected area: 5,200 acres, 7 streams and 10 stream miles of riparian habitat.

- The Ralston Ranch will relinquish two grazing permits on the USFS Lincoln Park and Calvert Hill grazing allotments. The USFS will not fill these permits behind the Ralston Ranch. Letters of intent from both parties are on file at the FWP Butte office. This action will give the USFS more management flexibility to deal with resource issues on these allotments, and ultimately will improve 5,200 acres of rangeland through reduced livestock use. These allotments contain important elk calving and winter range. Total affected area: 5,200 acres, 7 streams, and 17 stream miles of riparian habitat.
- Implementation of the grazing plan for deeded and BLM ground as described in the Upland Game Bird contract will facilitate a rest-rotation grazing system that satisfies the terms of the Ralston Ranch's Candidate Conservation Agreement with Assurances (CCAA) plan for Big Hole Arctic Grayling (10-year Agreement). This will enhance actions already taken on the Ralston Ranch and allow the continuation of more projects that will improve in-stream flows, allow fish passage and reduce/eliminate entrainment in irrigation ditches, for the benefit of grayling and other native fish species.

Full implementation of this proposal and all its contingencies will positively affect 30,247 acres, 25 streams and 64 stream miles across state, federal, and private lands for the benefit of fish, wildlife, and the recreating public.

Public Process and Comments

FWP is required by the Montana Environmental Policy Act (MEPA) to assess potential impacts of a proposed action to the human and physical environment. In compliance with MEPA, an Environmental Assessment (EA) was completed for the proposed project by FWP and released for public comment on February 2, 2011.

The following three alternatives were considered in this Environmental Assessment:

Alternative A: Renewal of the Mount Haggin WMA-South grazing lease with an increase in AUM's for the Ralston Ranch.

Alternative B: Renewal of the Mount Haggin WMA-South grazing lease without increasing AUM's for the Ralston Ranch.

Alternative C (No Action): Elimination of livestock grazing on the Mount Haggin WMA-South grazing system.

Public comments were taken for 27 days (February 2-28, 2011). Legal notices were printed in the *Montana Standard* (Butte) and the *Leader* (Anaconda). The Environmental Assessment was also posted on the FWP webpage: <http://fwp.mt.gov/publicnotices/>.

Five parties submitted comments over the 27-day comment period ending at 5:00 p.m. on February 28, 2011. Of the five respondents, one represented himself while four represented the following organizations or agencies: Skyline Sportsmen's Association, Anaconda Sportsmen's Club, Gallatin Wildlife Association, and the Bureau of Land Management-Butte Field Office.

Of the five respondents, four stated direct support for Alternative A; the fifth respondent stated that he generally opposes livestock use of Wildlife Management Areas, but since the Department appears committed to doing so on Mount Haggin WMA, he asks that the Department considers his comments and incorporates his ideas into the planning process.

Following is a summary of the comments received regarding the Mount Haggin Wildlife Management Area-South grazing lease renewal and FWP's response to them.

Support for Alternative A

The following reasons have been given in support of continuing the Mount Haggin WMA-South grazing lease:

- The BLM supported Alternative A, stating that this would benefit the BLM's Deep Creek Allotment as well as adjacent private lands by providing flexibility in the livestock period of use and by creating a two pasture rest-rotation grazing system. In addition, the management actions associated with Alternative A would benefit many land resource conditions in the area, including maintaining or improving soils, riparian areas and maintaining high quality vegetation for wildlife and livestock.
- The 15-year Upland Game Bird Habitat Enhancement Project Contract with the Ralston Ranch, in lieu of fee grazing for increased livestock usage on Mount Haggin WMA, will be a good deal for the Anaconda sportsmen and women. Petersons (lessees) are good stewards of the land and work well with sportsmen and women to provide access and hunting opportunities to their deeded land.
- The Ralstons and Bacons (lessees) have been very cooperative in allowing public hunting on their properties as well as cooperating in rest-rotation programs that benefit wildlife and fisheries habitats. We support the Upland Game Bird contract to improve habitat for mountain grouse.

The following is a summary of comments provided and FWP's response to them. Because some of these comments were generic to both the German Gulch and South grazing systems being proposed on Mount Haggin WMA, FWP's responses were directed at both, when appropriate.

- The BLM provided a correction to the total acreage of BLM land incorporated in the Mount Haggin –South grazing system. Instead of 473 acres, as stated in the Draft EA, the correct amount should be 909 acres.

FWP's response: This correction has been noted and thanks given to the BLM for providing the corrected acreage.

- We urge the department to continually monitor forage use so that there will be adequate forage for wildlife species.

FWP's response: FWP is committed to doing so, through the various monitoring methods that are currently in place and that have been described in the respective EA's under "Evaluation of Impacts to the Physical Environment".

- The grazing leases (USFS) relinquished by the Ralston ranch in the Lincoln Park and Calvert Hill grazing allotments should have a guarantee not to be filled for the life of this agreement and this guarantee should be in writing.

FWP's response: FWP has on file a letter from Russell B. Riebe, District Ranger for the Wisdom and Wise River Ranger Districts of the Beaverhead-Deerlodge National Forest, dated January 21, 2011, that addresses this concern. Relevant excerpts from this letter state:

“Calvert Hill Allotment: The FS has no intentions of reissuing this grazing permit due to allotment boundary and division fence issues. It would take a major monetary investment in range improvements (i.e. fences and water developments) to effectively control livestock within this grazing unit. In the age of declining, or flat federal budgets, we currently do not have the funding for this level of investment in range improvements. Secondly, we have resource concerns on an adjacent allotment (Toomey Creek C&H), and over the last few years we have authorized use of a small portion of the Calvert Hill allotment where there are no control issues. This has helped reduce livestock use of riparian areas and winter range within the Toomey Creek allotment. We intend to keep this option open, but use of the Calvert Hill allotment would be authorized through an existing grazing permit held by the Toomey Creek permittee.

Lincoln Park Allotment: the FS has no intentions of reissuing this grazing permit due to overstocking concerns and grazing impacts to sensitive riparian areas, including Moose Creek, which is a westslope cutthroat trout-occupied stream. There are currently two grazing permits associated with this allotment that authorize the grazing of 77 head (Ralston) and 107 head (Connoly) of cattle, respectively. The Ralston Ranch has not grazed this allotment since about 1997. From this time to the present, only the Connoly's have exercised their privilege to graze Lincoln Park. Even with this reduced use, past monitoring has indicated that 107 head was about what the allotment could handle for the permitted season, and still be in compliance with grazing standards.

For these reasons, the FS would hold on to the waived Ralston Ranch permits until such time that the permits can be 'officially' retired through an appropriate environmental review and NEPA decision to update allotment management on the Calvert Hill and Lincoln Park allotments.”

- The allotted livestock use for each lessee should stay the same or be reduced if range conditions dictate, for the life of the grazing lease.

FWP's response: the terms and conditions of the FWP grazing lease allows for annual flexibility in livestock use, depending upon vegetative conditions.

- The fencing on the upper end of Connor Gulch needs to be inspected and repaired as to not let cattle from the Lincoln Park area roam onto the area of BLM and Ralston Ranch lands that are being rested.

FWP's response: The fence in question is on the boundary with private land and BLM land. Therefore it is beyond FWP's area of responsibility. However, the point raised is valid and FWP will make the BLM aware of this concern.

- If the funding to install three miles of boundary fence between FWP and the USFS that is expected to come from the USFS Resource Advisory Committee grant doesn't come through, will FWP assume this cost or will the grazing system be put on hold until the fence is installed? Will this hold up the grazing lease renewal?

FWP's response: If FWP does not receive the USFS RAC grant, funding to cover the expense of this fence replacement will come from FWP's Operations and Maintenance budget and the project will be completed this summer, as planned. FWP accounted for this fencing project by scheduling this pasture for rest during the 2011 grazing season. The grazing lease renewal will not be delayed by this fencing project.

- Is there a wildlife management plan for Mount Haggin WMA? If not, there needs to be one.

FWP's response: As stated on page 1 of the Draft EA, the Mount Haggin WMA Interim Management Plan (1980) is in the process of being revised and is expected to be completed in 2011.

- Rest-rotation livestock use of the WMA is not an appropriate goal for any WMA.

FWP's response: FWP agrees with this opinion. Livestock grazing on the WMA in and of itself should not be, nor is, a goal of Mount Haggin WMA. However, when applied appropriately, rest-rotation livestock grazing is a useful tool to manage habitat conditions for fish and wildlife resources, often across broader landscapes than just the WMA.

- Provide a thorough discussion about degraded or missing native fish, wildlife or plant communities and what FWP's plans are for restoration and conservation of these native species. For example, what is the status of willow communities on the WMA, how has livestock use impacted these areas and the moose that depend on them, and have any willow communities been completely protected from livestock use during the growing season?

FWP's response: Discussion of native fish, wildlife and plant communities was included in each EA, respectively, under "Evaluation of Impacts on the Physical Environment". Further discussion on any restoration or conservation efforts is beyond the scope of this EA and would occur in an EA focused on those specific efforts. Regarding willow communities, trend photos and air photo interpretation show an increase in vigor and gross amount of willow communities across the WMA since FWP has assumed ownership and implemented a rest-rotation grazing system (Frisina and Keigley 2004). A willow browse evaluation system has been in place since 2000, following methodology described by Keigley and Frisina (1998), as a tool to help manage moose populations on the WMA. Four monitoring sites were established: two within pastures, two outside pastures (i.e. where no livestock grazing occurs). Monitoring results show no

significant difference in average annual browse utilization between the four sites. FWP, in cooperation with Montana State University, initiated a graduate research project in 2007 involving GPS-collared adult female moose to further explore the relationship between moose and the vegetation communities on the WMA. Results from this study have been synthesized annually in progress reports to FWP; the most recent completed in 2010. The final thesis is expected to be completed later this year. Preliminary results do not suggest impacts, direct or otherwise, to the moose population on the WMA as a result of livestock grazing.

Frisina, M.R. and R.B. Keigley. 2004. Habitat changes: Mount Haggin Wildlife Management Area. *Rangelands* 26: 3-13.

Keigley, R.B. and M.R. Frisina. 1998. Browse evaluation by analysis of growth form. Vol. 1. Montana Fish, Wildlife and Parks, Helena, MT. 153 pp.

Burkholder, B.O., V. Boccadori, R. A. Garrott. 2010. Winter distribution, habitat use and willow utilization patterns by Shiras moose (*Alces alces shirasi*) on the Mount Haggin Wildlife Management Area. Montana Fish, Wildlife and Parks, Progress Report, Butte, MT. 74 pp.

- There should be an appropriate watershed or pasture-level control for monitoring impacts of the grazing system over time. Additionally, how is FWP monitoring the livestock use plan?

FWP's response: FWP recognizes the need to monitor impacts of the grazing system over time. FWP has employed permanent photo points on both grazing systems (German Gulch and South), and in the case of the South system, two vegetation exclosures have also been established. This monitoring effort is described in greater detail under the "Vegetation" section on page 6 of the Draft EA for the German Gulch system, and on page 9 of the Draft EA for the South system. While pasture-level controls have not been built into either grazing system on Mount Haggin, surrogates do exist. The Mid Beef pasture within the German Gulch system receives permanent rest from livestock grazing, functioning as a control, and the two vegetation exclosures on the South system also serve this function. In addition, a large portion of the northeastern portion of the WMA has no livestock grazing on it.

- What are the key native plants, fish and wildlife species that are being monitored with respect to livestock grazing on the WMA? What trend data for these species has been compiled?

FWP's response: FWP monitors native plant communities rather than individual species through photo points and exclosures. These sites were established to capture the key vegetation communities in both the upland and riparian areas on the WMA, such as sagebrush-grassland, bitterbrush-grassland, forest-grassland edge, grassland, aspen and willow. In addition, they are well distributed throughout the pastures for each grazing system. Fishery surveys are conducted approximately every five years to assess the native fisheries status. The fisheries resources associated with both grazing systems have been described on page 8 of the Draft EA for the German Gulch system and on page 11 of the Draft EA for the South system. Aerial wildlife

surveys are conducted annually on the WMA for moose, elk, mule deer and antelope. In addition, a beaver survey will be conducted on the WMA this fall. The wildlife resources associated with both grazing systems have been described on page 9 of the Draft EA-German Gulch and page 13 of the Draft EA-South.

- Identify how many miles of fencing are currently in place or must be constructed as a result of continuing livestock use on the WMA.

FWP response: There are approximately 21.8 miles of fencing associated with the German Gulch grazing system. Approximately 8.37 miles of this is in major disrepair and is expected to be replaced in 2011. This has been noted on page 2 of the Draft EA under "Costs and Jurisdictions". There is approximately 50 miles of fencing in the South grazing system. Approximately 3.6 miles of this is defunct and expected to be replaced in 2011 in addition to approximately 1 mile of new fence construction, also expected to be completed in 2011. This has been noted on page 4 of the Draft EA under "Costs and Jurisdictions".

- How many stock tanks, miles of pipeline and water diversion is associated with the Mount Haggin grazing systems?

FWP response: neither the German Gulch nor the South systems on the WMA have any stock tanks, pipelines or water diversions associated with them.

- Provide a web site based monitoring plan so that information is available to the public in a timely manner.

FWP's response: Currently, such a site does not exist nor are there plans to create such a site at this time. However, all data gathered by FWP is public information and can be provided to inquiring parties, along with interpretation of analyses and results, as requested.

- Provide a thorough scientific literature review and analysis in the EA of the impacts of livestock use to native fish, wildlife and plants. (The commenting party provided such a review to FWP along with their comments.)

FWP's response: FWP thanks the respondent for providing their literature review to the department and recognizes the ever-present opportunity to be more thorough in the execution of and evaluation of our management of Montana's fish and wildlife resources. While an exhaustive literature search on the order of the respondent's was not conducted for both Mount Haggin grazing lease renewal EA's, FWP fish and wildlife biologists gave careful consideration to the impacts of livestock grazing on the resources, drawing upon their expert knowledge, field observations, trend surveys, and scientific studies conducted locally on the Mount Haggin and Fleecer WMA grazing systems.

- How were stocking rates determined?

FWP's response: Stocking rates were determined using guidelines described in the following:

Lacey, J. and J.E. Taylor. 1985. Montana guide to range site, condition and initial stocking rates. Montana State University, Extension Service, MT198515 AG, Bozeman, MT. 4pp.

The proposed stocking rates for both the German Gulch and South systems are below the rates suggested, which are based on range sites and soil characteristics. This illustrates the fact that it is not the objective of the Mount Haggin grazing systems to maximize livestock production on the WMA, but rather to use a managed livestock grazing system for the benefit of wildlife and fish resources and the habitat upon which they depend.

- What is the current grazing fee on the Mount Haggin WMA systems relative to market value?

FWP's response: There are two grazing rate options that FWP can choose when setting grazing fees on the WMA's. One is the FWP rate, set at \$18.40 per Animal Unit Month (AUM) for 2011; the other is the rate set by the Department of Natural Resources and Conservation, which is \$6.23 per AUM for 2011. Both rates fluctuate annually depending on market conditions. Since 2001 FWP has been charging the DNRC rate on both the German Gulch and South grazing systems, with the condition that lessees are responsible for daily fence maintenance and repair. In the long run this has proved more economical for the department by avoiding the cost of fence maintenance during the grazing system.

- Provide a thorough review and analysis of the monitoring program since livestock use has been implemented on the WMA and the current trend data for important native fish, wildlife and plants. How long has the Mount Haggin WMA been utilized by livestock under FWP's supervision?

FWP's response: this information has been provided in the respective grazing lease renewal EA's for Mount Haggin WMA under "Evaluation of Impacts on the Physical Environment".

- What livestock use system has been in place? What records have been kept to verify compliance on the WMA and how is non-compliance handled?

FWP's response: The livestock use system that has been in place and is proposed for continuation is a rest-rotation system, as described in the respective Mount Haggin WMA grazing EA's. Lessee grazing lease compliance is monitored through several avenues, including a spring meeting with lessees prior to the start of the grazing season, periodic field checks throughout the summer while performing other duties on the WMA, and wrap-up meetings, usually via phone, after the grazing season is completed for the year. Non-compliance has not been an issue to date. When a problem does occur on the grazing system, usually in the form of trespass cattle, a phone call to the lessee has been sufficient to get the problem corrected in a timely manner.

- Consider other alternatives to traditional rest-rotation systems, especially and primarily those that will provide more vegetative rest to the landscape.

FWP's response: FWP appreciates the prompt to stay open to new possibilities and maintain thoughtfulness rather than habit when managing the state's fish and wildlife resources. However at this time FWP feels that the current cooperative German Gulch grazing system is providing benefits to wildlife across a broad landscape and does not warrant changes. While FWP proposes to retain the rest-rotation program on the South grazing system, the proposal does include an expansion of the pastures included in this system. This will lower the overall stocking rate and provide lighter use than what has been sustained previously, in addition to the rest that is built into the system. Also through the contingencies explained in the EA, additional acres of BLM and private lands previously managed under continuous grazing will be managed under a rest-rotation system, and two US Forest Service allotments will be relinquished, thereby allowing complete rest from livestock grazing on this acreage.

- Does FWP have any data that suggests extended periods of rest from livestock grazing is NOT beneficial to native fish, wildlife and plant communities?

FWP's response: No. From a biological standpoint, FWP feels that extended periods of rest or absence of livestock grazing would not negatively impact native fish, wildlife or plant communities. Experience has shown FWP, however, that well-managed livestock grazing on WMA's provides both biological benefits to wildlife (i.e. removal of previous year's growth of grasses (Wambolt et al 1997), as well as social benefits to wildlife through tolerance (i.e. the case of the Fleecer wintering elk herd (Frisina and Morin 1991)).

Frisina, M.R. and F. Morin 1991. Grazing private and public land to improve the Fleecer Elk Winter Range. *Rangelands* 13:291–294.

Wambolt, C. L., M.R. Frisina, K.S. Douglass, and H.R. Sherwood 1997. Grazing effects on nutritional quality of bluebunch wheatgrass for elk. *Journal of Range Management* 50: 503-506.

- Please consider a “good neighbor” alternative that prescribes livestock use in just one pasture a year from July 15th – August 15th, rotating that use through the pastures in the system.

FWP's response: While FWP recognizes the value of additional rest that such a grazing system would provide to 21,378 acres on the WMA, it also recognizes that adoption of such a system on the WMA would cease and void all cooperative grazing programs associated with the German Gulch and South grazing systems. Such cessation would negatively impact native fish, wildlife and habitat across 22,876 acres of US Forest Service land, 3,073 acres of Bureau of Land Management land, and 2,600 acres of private land that are part of the currently proposed grazing systems. For this reason, FWP feels the greater benefit to fish, wildlife and habitat is through continuation of these cooperative programs that have broad, landscape level applications.

- Provide a full cost/benefit accounting, including all staff time, spent on this endeavor. Can FWP clearly demonstrate that the benefits of undertaking this intensive livestock use program exceed the costs, both economically and more importantly, ecologically?

FWP's response: The short answer is that such accounting does not exist nor can it be measured in such simplistic terms. While financial costs and income can be accounted for and have been provided in the EA's (maintenance costs associated with the German Gulch and South systems since their inception on page 5 and page 7, respectively, and income generated by grazing fees on page 17 and page 21, respectively), the intrinsic costs and benefits are not as easy to quantify. For instance, how would one quantify the cost to wintering elk if the Mid Beef pasture in the German Gulch system was not permanently rested from livestock grazing in the absence of the cooperative grazing program? Or how does one quantify the benefit to anglers from having an improved native fisheries along Deep Creek and the Big Hole River due to the Ralston Ranch's continuation of habitat improvement projects through their CCAA, as a result of increasing livestock usage on the Mount Haggin-South grazing system? At the forefront of management actions proposed by FWP biologists is the question of whether there will be an overall benefit to fish and/or wildlife as a result of the action. While it may be offensive to some members of the public that such definitive accounting cannot be provided in the case of the proposed Mount Haggin grazing systems, FWP feels that in full consideration of both measurable and intrinsic costs and benefits, renewal of these grazing systems would provide an overall benefit to native fish and wildlife resources.

- Provide full disclosure on any cooperative or financial agreements with private land or livestock owners as well as other state or federal agencies.

FWP's response: Documents associated with the German Gulch and South grazing programs and their status include the following:

- *Cooperative Agreement with the Butte District of the Beaverhead-Deerlodge National Forest regarding the German Gulch grazing system. This document has been recently updated, signed by the Forest Service, and is awaiting FWP signature.*
- *Cooperative Agreement with the Wise River District of the Beaverhead-Deerlodge National Forest regarding the South grazing system. This document is in the process of being updated, pending approved changes to the grazing system, and will be signed by both parties later this summer.*
- *Memorandum of Understanding between the Bureau of Land Management and FWP regarding the South cooperative grazing program. This document will be updated and signed by both parties later this summer.*
- *Individual grazing leases between FWP and Peterson Fairmont Ranch, Ralston Ranch, Bacon Ranch, and Clyde Thompson, respectively. Pending FWP Commission approval, these leases will be signed by both parties during the spring permittee meetings.*
- *Upland Game Bird Habitat Enhancement Project contract between FWP and the Ralston Ranch. This contract has been approved by FWP and will be signed by both parties this winter.*
- *Candidate Conservation Agreement with Assurances (CCAA) for Arctic grayling between FWP and the Ralston Ranch. This document has been signed by both parties and is currently being enacted upon.*

All documents, with the exception of the CCAA, are on file at FWP's Butte Area Resource Office. The CCAA is on file at FWP's Dillon field office.

- Provide a discussion about habitat quality versus range condition.

FWP's response: The discussion provided in the respective EA's for each grazing system speaks in terms of habitat rather than range conditions. Since FWP's focus is not on livestock production, we feel a discussion of range conditions is not warranted in this response.

- How does drought get accounted for in the livestock management system?

FWP's response: An agreement is built into the grazing leases that allow FWP to modify grazing dates, depending upon vegetative conditions. When FWP exercised this conditional modification in the past, lessees complied fully with the request.

- Provide an explanation of hunter, recreation, motorized travel and road management plans for the WMA.

FWP's response: This request is beyond the scope of this EA. Such information will be provided in the Mount Haggin WMA Management Plan, expected to be updated later this year.

Final Environmental Assessment

The only modification to the Draft Environmental Assessment that has been made is to correct the number of BLM acres that are incorporated into the Mount Haggin WMA-South grazing system, i.e. 909 acres instead of 473 acres. The total affected acres as a result of this proposed action has also been corrected accordingly, i.e. 19,847 acres instead of 19,411 acres. No other modifications to the Draft have been made. Therefore, the Draft Environmental Assessment, together with this Decision Notice, will serve as the final document for this proposal.

Decision

Based on the Environmental Assessment and public comment, it is my decision to approve the implementation of Alternative A for renewal of the Mount Haggin WMA-South grazing lease.

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.



Patrick J. Flowers
Region 3 Supervisor
Montana Fish, Wildlife & Parks

03/17/2011
Date