DECISION NOTICE for the Draft Environmental Assessment:
Isaac Homestead WMA Agricultural 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 proposed action is to continue a share-crop agreement on ~125 acres of the WMA with a long-time, competent lessee. The fields in the proposed project area have traditionally been utilized for agricultural production. The lessee will cultivate and retain a portion of the grain crop harvest, leaving the remaining crop standing for wildlife use during winter months.

The benefit and purpose of the lease is to provide winter habitat and forage, primarily for pheasants, deer, and turkeys. Standing crops also benefit migrating waterfowl and a variety of other wildlife species. The area is open to public hunting during all commission-approved seasons, and provides opportunity for deer, upland game bird, and waterfowl hunting.

The WMA has been under an agricultural lease with the same lessee since 1985. The lessee has shown initiative to utilize farming practices that increase the productivity of the land. These include fertilizing and conditioning the soil, treating of noxious weeds, and maintaining fields in good condition. The lessee has fulfilled all conditions of previous leases entered into with MFWP.

ALTERNATIVE TO PROPOSED ACTION:

Alternative A: No Action: Agricultural lease will not be renewed and agricultural lands will not be cultivated.

- Winter-time wildlife habitat would be limited by a lack of food resources.
- Structural diversity of vegetation (edge) would decrease over time.
- MFWP would be required to commit additional resources for weed management on the previously cultivated acres.

Alternative B: Proposed Action: Continue agricultural production: Agricultural lease will be renewed for the mutual benefit of the lessee, MFWP, and wildlife.

- Wintering wildlife will be provided a food source.
- Structural diversity of vegetation will increase through the cultivation grain crops.

- Noxious weeds will be treated and controlled through common farming practices.
- Soils will be fertilized, conditioned, and stabilized.
- Healthy relationships between MFWP and neighboring landowners/farmers will be maintained.

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. FWP released a draft environmental assessment (EA) for public review of this proposal (Isaac Homestead Wildlife Management Area Agricultural Lease) on January 30, 2013 and accepted public comment until 5:00 P. M. on February 20, 2013.

Legal notice of the proposal and availability of the draft EA was published in the *Miles City Star* and the *Forsyth Independent Press*. The *Billings Gazette* published a news article on January 30, 2013 (http://billingsgazette.com/lifestyles/recreation/fwp-proposing-to-farm-portion-of-wildlife-management-area/article_9e4bf19f-9cd8-5868-9799-0d10a4b92c53.html). 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 FWP's web site (http://fwp.mt.gov/, "Recent Public Notices" and "Submit Public Comments") from January 30, 2013 through February 20, 2013. An FWP statewide news release was issued January 30, 2013 and posted on FWP's website (http://fwp.mt.gov/, "News Releases") the same day.

SUMMARY OF PUBLIC COMMENT

FWP received 4 total comments representing 3 persons and 1 group (The Gallatin Wildlife Association, Bozeman, Montana).

Half of the comments indicated support for the proposed project. The other half requested clarification of the intent and justification for the proposed project but did not state support or opposition. All comments can be viewed in their entirety in Appendices A and B.

RESPONSE TO PUBLIC COMMENT

Below is a summary of comments and FWP responses. For ease of response, similar comments are grouped together if they express a similar view (comment numbers correspond to the numbering of the individual commenter's and paragraphs in Appendix A).

Comment 1a.
I can only see good things from this as game animals and birds like crop land. Also it must stay open to the public during all hunting seasons.

FWP Response: The WMA is open to public hunting during all commission approved hunting seasons.

Comment 3a. (Transposed from hand written comments – See Appendix B)
In reviewing the Montana, Fish, Wildlife & Parks Environmental Assessment (Agricultural Lease on portion of Isaac Homestead Wildlife Management Area) presented by MFW&Parks Wildlife Biologist Jeremy Banfield, I would like to go on record of being in favor of the proposed action. With this lease there is an opportunity to grow crops, saving back 20% of the yield to enhance wildlife sustainability – it is a WIN, WIN. To increase the winter food resource for our land, water, air, vegetation and fish/wildlife listed in the report, I see very minimal impacts. This proposed lease is sound management.

The Environmental Assessment was well prepared and easy to understand.

FWP Response: Commenter is in favor of the proposed project and no response is required.

Comment 2a.
I live in Colstrip and try to visit the property at least a couple of times a year during pheasant season. Due to changing adjacent (non-accessible) property crop management strategies, we've found a very diminished available resource. Standing corn alone on those properties has pulled nearly all of birds away from the WMA.

The experience has changed so much that opening morning of the pheasant season had only my wife and myself on the WMA. Prior years had lots of folks - from all over eastern Montana - on the property opening day. With very few pheasants staying on the property, folks have apparently just quit coming?

If the proposed lease is designed to help solve this resource displacement problem, I am in support. If somehow you could include opening some access to the neighboring properties with this proposal, I would be a strong advocate.

Please keep the goal of maximizing the accessible resources rather than maximizing the profit margin of a landowner who has no interest in doing so.

FWP Response: Habitats selected by ring-necked pheasants during the fall hunting season are related to a myriad of factors including but not limited to, age, sex, reproductive status, predator density, and vegetation type. However, establishment of unharvested food plots, utilizing corn or sorghum is being planned for future seasons with the ultimate aim of improving pheasant retention and hunting opportunities. Providing hunting opportunities on adjacent private properties is beyond the scope of this EA.

Comment 4b.
2. Despite years of experience with agricultural share-cropping on WMAs (9 years on 7 Sisters, 12 years on Elk Island) no local wildlife data are presented for evaluating the effectiveness of this management technique for any of the three primary wildlife species.

Comment 4c.

3. There apparently are no plans for evaluating the effectiveness of renewed or new agriculture or grazing activities on any population characteristics of any of the primary wildlife species. When public resources are being committed, we believe management goals should be precisely stated and goal-achievement should be measured. This is necessary for real adaptive management. It is necessary to demonstrate value in the use of public resources.

FWP Response: The area wildlife biologist annually surveys the WMA for white-tailed deer and pheasants as part of larger trend area surveys for both species. Whitetails and pheasants are abundant on the WMA, with densities similar to or exceeding densities in surrounding areas (based on communication with past and present area biologists). The WMA annually receives significant hunting pressure yet hunter success rates are high (based on communication with sportsmen). The intent of the WMA is not to conduct research, rather to implement science-based practices to manage wildlife populations for the benefit of sportsmen. Rigorous research and data collection as suggested by the commenter would be extremely costly, unnecessary to achieve management goals, and would require landscape-level analyses that are beyond the scope of this EA, which specifically addresses an agricultural lease on a small portion of the WMA.

Comment 4d.

4. Populations of the three primary wildlife species are complexly limited. That is, limiting factors vary greatly in space and time. However, there is very little or no discussion of habitat limitations for the three wildlife species in the project area. It seems that some habitats being created or maintained by leases on the WMAs are abundant on adjacent or nearby private lands. Will duplication of these habitats provide habitat that is limiting? Might other needed habitat types be scarcer on the area landscape? All four EAs provide broad, unsubstantiated statements regarding the values of the projects to the three primary wildlife species and to many species of "other wildlife". More precise discussion of this issue is warranted. If it cannot be provided, the need for on-the-ground evaluation of the effects of these projects is emphasized.

FWP Response: A broader picture of landscape-level habitat and spatiotemporal habitat needs of wildlife is beyond the scope of this EA, which specifically addresses an agricultural lease on a small portion of the WMA.

Comment 4a.

1. There are no references to any scientific literature indicating positive or negative effects of agricultural food plots, artificial nesting cover, or rest-rotation grazing on white-tailed deer, ring necked pheasants or wild turkey.

Comment 4k.

5. Note that, since cropped lands are shared with 20% of the crop unharvested, the unharvested acres will have to be 5 times as valuable (on a per-acre basis) as unmanipulated land before the sharecropping begins to be justified. Admittedly, this is an oversimplification and assumes that the harvested acres have zero value for a selected wildlife function, such as winter food for white-tailed deer. However, stubble fields or fall-plowed land have little wildlife value. The concept is justified and must be considered in evaluating the costs and benefits of the project and

in comparing alternatives. In a given year, the wildlife value of a newly plowed and planted field may be almost zero; in exchange for 20% of the field being wildlife-useful for part of the year.

FWP Response: It has been well-documented in the scientific literature that agricultural food plots can be beneficial and even critical for overwinter survival, body condition, and reproduction in a variety of wildlife species (deer, upland game birds, waterfowl, etc.). This is particularly true during extreme winters, when overwinter mortality of wildlife can devastate wildlife populations in Montana. Wildlife commonly forage in both harvested and unharvested agricultural fields during fall and winter—the commenter is incorrect in his assumption that stubble fields have little wildlife value. Harvested fields provide little cover but valuable foraging areas. Fields on this WMA are plowed in the spring of each year. Agricultural crops and hayfields are beneficial to favored game species when adequate cover for fawning, nesting, brood rearing, and overwinter survival are abundant. A broader picture of landscape-level habitat is beyond the scope of this EA, which specifically addresses an agricultural lease on a small portion of the WMA. However, the mosaic of cropland, woodlands, shrublands, and grasslands present on the WMA provide ideal habitat for white-tailed deer, pheasants, and turkeys. Although upland game birds will nest in agricultural fields, abundant nesting cover is available on the WMA and nesting cover is not limiting to local upland game bird populations. Rather, winter severity and overwinter survival generally have the greatest impact on upland game bird populations in eastern Montana. An exhaustive literature search and citation are unnecessary for well-documented and ground-proven wildlife management principles and practices. Rest-rotation grazing is beyond the scope of this EA.

Comment 4g.
1. Note that maintaining irrigated cropland on the WMA will detract from maintaining "the unique riparian ecosystem", which is a stated goal for the WMA.

FWP Response: The WMA's combined mosaic of cropland, woodlands, shrublands, and grasslands, are precisely what distinguishes the area as a unique riparian ecosystem. Maintaining this mosaic through the proposed share-cropping agreement would indeed sustain the distinctive ecosystem this area provides.

Comment 4h.
2. Table 3 notes that diversion of water for irrigation will not result in any (bad) changes or impacts to surface water or runoff. The possibility that stream or river flows or water quality might be improved by ending this diversion is not addressed.

FWP Response: Water is supplied by the Rancher's Ditch Irrigation Company, and ending the diversion altogether is outside the scope of this EA. If FWP were to avoid using water from irrigation ditches, no appreciable improvement in Yellowstone River water quality would be expected (given the small percent of diverted water currently being utilized on the WMA), but the quality of the local habitat would appreciably deteriorate.

Comment 4i.

3. There is no discussion and comparison of the specific benefits to the three primary wildlife species from whatever unidentified species of "small grains" will be planted on the WMA. This uncertainty makes the EA difficult to evaluate.

FWP Response: Small grains generally refer to wheat, barley, rye, and corn. Each crop type has benefits for wildlife, soil health, and weed control. The preferred crop in a given field is dictated by conditions in that field. Crops must be rotated to prevent disease and improve soil health. Legumes fix nitrogen to benefit soil fertility. Perennial food plots provide both food and cover, but may not be a good choice in areas where weed infestations are likely or areas with flood-damaged soils. Small grains may be preferred when weed control is a concern. A diversity of crop types is preferred for wildlife because none are nutritionally complete, yet all of the listed crops can provide a critical source of winter food, especially when used in combination.

Comment 4j.
4. Nesting cover is often considered limiting to pheasant populations. Often, the best nesting cover includes residual cover from the previous growing season. Uncut planted or natural grasses can provide nesting cover for at least several years without costly artificial manipulation. Is pheasant nesting cover so abundant on the rest of the WMA, or nearby, so that the option of creating undisturbed nesting cover need not be considered?

FWP Response: In eastern Montana, winter survival is generally the factor that most limits pheasant populations. Abundant nesting cover is available on the WMA, however a broader picture of pheasant habitat is beyond the scope of this EA, which specifically addresses an agricultural lease on a small portion of the WMA.

Comment 4l.
6. Referring to Alternative A, we disagree that "structural diversity of vegetation" (not patch diversity or "edge effect") will be less in a succession of natural vegetation that would occur without this project, as compared to structural diversity in agricultural fields managed for small grain crops.

FWP Response: If fields remain undisturbed over time natural succession results in monotypic stands of smooth brome providing little to no structural diversity or edge effects. Agricultural production incorporating portions of standing crop provide a both structural diversity and dynamic edge effects which vary seasonally and annually.

Comment 4m.
7. Under the no action alternative, we see no need for the soils to be fertilized, "conditioned" or stabilized. This claimed benefit of the agricultural lease is questionable.

FWP Response: As previously stated natural selection under the no action alternative would result in static monotypic stands of smooth brome. Without disturbance, over time soil health declines as annual grasses deplete vital nutrients. Annual discing of existing vegetation improves soil health by expediting decomposition, while fertilization directly replenishes vital nutrients.

Comment 4n.
8. "Healthy relationships" between landowners and FWP should be based upon mutual trust and respect, not on diverting public resources from optimal public benefits to private uses.

FWP Response: We acknowledge that relationships between landowners and MFWP should be and are built on a foundation of mutual respect. However, the proposed sharecropping agreement is a fiscally conservative method of accomplishing wildlife management goals and is thus optimizing public benefits through cooperation of nearby farmers (lessee).

Comment 4e.
5. Financial costs of alternatives are vague. Our experience is that these costs are often understated for managing private activities on our WMAs. Expected costs for weed control under the no-action alternative are not given. Personnel costs for managing and administering the projects are not provided. Costs of owning, using and maintaining irrigation equipment, water and fences (at least on Isaac Homestead WMA) are not provided.

Comment 4f.
6. The alternative of converting these lands to natural vegetation is not explored or analyzed. There is no description of what natural vegetative succession, or wildlife benefits, will occur if any of these projects are not applied to our WMAs. The only implication given is that there will be "weeds". This seems to be largely a simplification of natural succession used to justify the projects.

Comment 4o.
Please consider the above comments in evaluating the Isaac Homestead agricultural lease. Since WMAs are relatively rare on the landscape, we must maximize their value in achieving our wildlife goals. Moreover, public funds and other resources should be used as efficiently and effectively as possible. We are under no illusion that this is a simple request.

FWP Response: Weed control costs would depend on the extent and nature of infestations, and are therefore impossible to accurately calculate. The cost of herbicide plus equipment could easily exceed $50/ac or >$6,250 if the entire 125 acres needed treatment. Multiple treatments would likely be necessary to control noxious weeds before vegetation reestablished, and is unlikely to result in high-quality wildlife habitat. Converting lands to natural vegetation through natural succession would likely result in a near-monoculture of exotic smooth brome grass, based on "natural" vegetation surrounding areas. Noxious weeds would indeed be an issue and weed control would be necessary (leafy spurge and Canada thistle are two weed species that are common in the area). Few wildlife benefits will result from the no action alternative—smooth brome has little value for upland game bird nesting habitat or whitetail forage. Monotypic stands lack diversity, and without robust forb and insect components grasslands generally decrease in wildlife value. Long-term plans for the proposed lease area do call for conversion of some areas to dense nesting cover while maintaining some land in agricultural production to provide winter food for wildlife. Stands of dense nesting cover also require management to prevent encroachment of smooth brome and other weeds. The proposed agricultural lease is the preferred alternative because it will

provide critical winter food and cover for wildlife. Conducting management activities through the proposed sharecropping agreement is a fiscally conservative method of accomplishing wildlife goals. The lessee operates all equipment and is responsible for weed control within the leased areas. Implementing habitat projects and planting food plots without the use of a sharecropper was not considered because it would be extremely costly, would require additional personnel, and would not be justified since both harvested and unharvested cropland areas provide wildlife benefits. Personnel costs would be similar under the no-action and preferred alternative—the area biologist would be required to determine management plans and monitor the area equally under each alternative. The cost of maintaining FWP owned irrigation equipment and fences annually is minimal (~$80.00). Costs for irrigation water are set and required to be paid to the Rancher Ditch Company regardless of water use (i.e., even if no water is used, the assessed fee must be paid).

DECISION NOTICE

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

MFWP'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 agricultural 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.

March 13, 2013

Brad Schmitz — Date

R7 Regional Supervisor

APPENDIX A
PUBLIC COMMENTS – ISAAC HOMESTEAD WMA AGRICULTURAL LEASE
JANUARY 30 – FEBRUARY 20, 2013

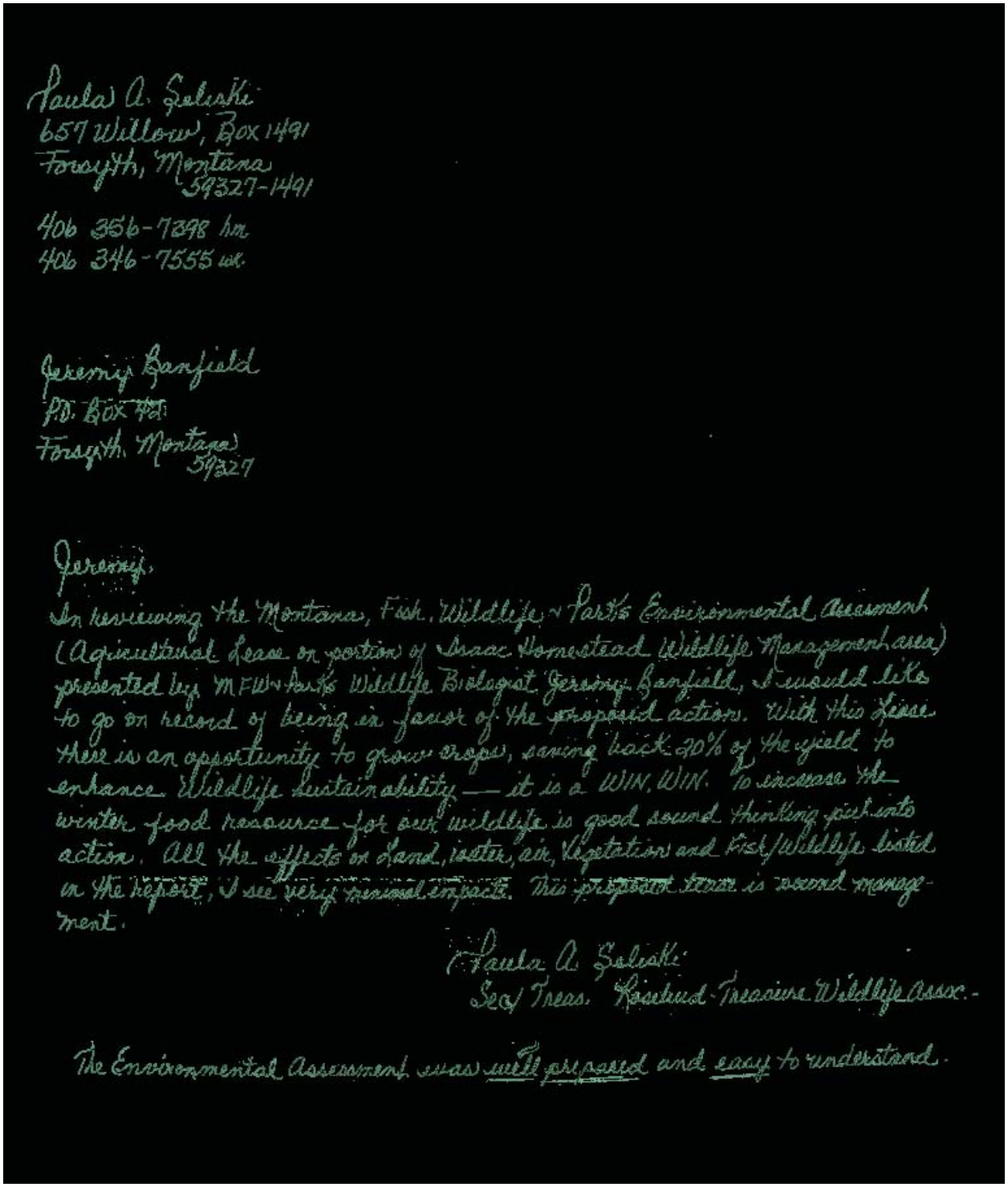
Comment #		Comment
1		**From:** goosehaven@rangeweb.net **To:** Banfield, Jeremy **Subject:** Public Comment: Comments Sought on Proposed Agricultural Lease of Isaac Homestead Wildlife Management Area **Date:** Wednesday, January 30, 2013 11:49:43 AM
	a	I can only see good things from this as game animals and birds like crop land. Also it must stay open to the public during all hunting seasons.
2		**From:** Rick And Diane (grrizzz@q.com) **To:** Banfield, Jeremy **Subject:** Proposed Isaac Homestead Lease **Date:** Friday, February 01, 2013 7:12:24 AM
	a	I live in Colstrip and try to visit the property at least a couple of times a year during pheasant season. Due to changing adjacent (non-accessible) property crop management strategies, we've found a very diminished available resource. Standing corn alone on those properties has pulled nearly all of birds away from the WMA. The experience has changed so much that opening morning of the pheasant season had only my wife and myself on the WMA. Prior years had lots of folks - from all over eastern Montana - on the property opening day. With very few pheasants staying on the property, folks have apparently just quit coming? If the proposed lease is designed to help solve this resource displacement problem, I am in support. If somehow you could include opening some access to the neighboring properties with this proposal, I would be a strong advocate. Please keep the goal of maximizing the accessible resources rather than maximizing the profit margin of a landowner who has no interest in doing so. Thanks for allowing me to comment Rick Miller Colstrip, MT 406-748-3512 (evenings)
3		**Received by mail:** Transcribed below (scanned copy attached: see Appendix B) **From:** Paula A. Seliski **To:** Jeremy Banfield **Date:** February 4, 2013 Paula A. Seliski 657 Willow, Box 1491 Forsyth, Montana 59327-1491 406-356-7398 406-346-7555

		Jeremy Banfiled P.O. Box 428 Forsyth, Montana 59327 Jeremy,
	a	In reviewing the Montana, Fish, Wildlife & Parks Environmental Assessment (Agricultural Lease on portion of Isaac Homestead Wildlife Management Area) presented by MFW&Parks Wildlife Biologist Jeremy Banfield, I would like to go on record of being in favor of the proposed action. With this lease there is an opportunity to grow crops, saving back 20% of the yield to enhance wildlife sustainability – it is a WIN, WIN. To increase the winter food resource for our land, water, air, vegetation and fish/wildlife listed in the report, I see very minimal impacts. This proposed lease is sound management. Paula A Seliski Sec. / Treas. Rosebud-Treasure Wildlife Assoc.- The Environmental Assessment was well prepared and easy to understand.
4		**From:** Glenn Hockett [glhockett@bresnan.net] **Sent:** Tuesday, February 19, 2013 3:10 PM **To:** Jeremy Banfield **Subject:** Isaac Homestead WMA Agricultural Lease Feb. 19, 2013 J Banfield Montana Fish, Wildlife & Parks P. O. Box 428 Forsyth, MT 59327 (jbanfield@mt.gov) **Subject:** Comments on Draft EA for the Isaac Homestead WMA Agricultural Lease Dear Mr. Banfield: The Gallatin Wildlife Association (GWA) is a non-profit volunteer wildlife conservation organization representing hunters and anglers in Southwest Montana and elsewhere. Our mission is simply to protect habitat and conserve fish and wildlife. GWA supports sustainable management of all fish and wildlife populations through fair chase public hunting and fishing opportunities that will ensure these traditions are passed on for future generations to enjoy. We are commenting separately on this and three other current EAs for managing agricultural use or grazing on our public wildlife areas. These EAs have much in common. Consequently, our 4 letters contain much repeated information. The three WMAs, subjects of these four EAs, are outside our region of Montana and our members have little or no personal experience on the areas. Thus, we apologize if we are making any incorrect assumptions. We understand that the primary purposes of these WMAs are to support populations and facilitate hunting of white-tailed deer, ring necked pheasants and wild turkeys. Secondary purposes are to benefit a diversity of wildlife expected to inhabit the Yellowstone River valley. I Issues for all four EAs.
	a	1. There are no references to any scientific literature indicating positive or negative effects of

		agricultural food plots, artificial nesting cover, or rest-rotation grazing on white-tailed deer, ring necked pheasants or wild turkey.
	b	2. Despite years of experience with agricultural share-cropping on WMAs (9 years on 7 Sisters, 12 years on Elk Island) no local wildlife data are presented for evaluating the effectiveness of this management technique for any of the three primary wildlife species.
	c	3. There apparently are no plans for evaluating the effectiveness of renewed or new agriculture or grazing activities on any population characteristics of any of the primary wildlife species. When public resources are being committed, we believe management goals should be precisely stated and goal-achievement should be measured. This is necessary for real adaptive management. It is necessary to demonstrate value in the use of public resources.
	d	4. Populations of the three primary wildlife species are complexly limited. That is, limiting factors vary greatly in space and time. However, there is very little or no discussion of habitat limitations for the three wildlife species in the project area. It seems that some habitats being created or maintained by leases on the WMAs are abundant on adjacent or nearby private lands. Will duplication of these habitats provide habitat that is limiting? Might other needed habitat types be scarcer on the area landscape? All four EAs provide broad, unsubstantiated statements regarding the values of the projects to the three primary wildlife species and to many species of "other wildlife". More precise discussion of this issue is warranted. If it cannot be provided, the need for on-the-ground evaluation of the effects of these projects is emphasized.
	e	5. Financial costs of alternatives are vague. Our experience is that these costs are often understated for managing private activities on our WMAs. Expected costs for weed control under the no-action alternative are not given. Personnel costs for managing and administering the projects are not provided. Costs of owning, using and maintaining irrigation equipment, water and fences (at least on Isaac Homestead WMA) are not provided.
	f	6. The alternative of converting these lands to natural vegetation is not explored or analyzed. There is no description of what natural vegetative succession, or wildlife benefits, will occur if any of these projects are not applied to our WMAs. The only implication given is that there will be "weeds". This seems to be largely a simplification of natural succession used to justify the projects. II Issues for Isaac Homestead Agricultural Lease
	g	1. Note that maintaining irrigated cropland on the WMA will detract from maintaining "the unique riparian ecosystem", which is a stated goal for the WMA.
	h	2. Table 3 notes that diversion of water for irrigation will not result in any (bad) changes or impacts to surface water or runoff. The possibility that stream or river flows or water quality might be improved by ending this diversion is not addressed.
	i	3. There is no discussion and comparison of the specific benefits to the three primary wildlife species from whatever unidentified species of "small grains" will be planted on the WMA. This uncertainty makes the EA difficult to evaluate.
	j	4. Nesting cover is often considered limiting to pheasant populations. Often, the best nesting cover includes residual cover from the previous growing season. Uncut planted or natural grasses can provide nesting cover for at least several years without costly artificial manipulation. Is pheasant nesting cover so abundant on the rest of the WMA, or nearby, so that the option of creating undisturbed nesting cover need not be considered?
	k	5. Note that, since cropped lands are shared with 20% of the crop unharvested, the unharvested acres will have to be 5 times as valuable (on a per-acre basis) as unmanipulated land before the sharecropping begins to be justified. Admittedly, this is an oversimplification and assumes that the harvested acres have zero value for a selected wildlife function, such as winter food for white-tailed deer. However, stubble fields or fall-plowed land have little wildlife value. The concept is justified and must be considered in evaluating the costs and benefits of the project and in comparing alternatives. In a given year, the wildlife value of a newly plowed and planted field may be almost zero; in exchange for 20% of the field being wildlife-useful for part of the year.
	l	6. Referring to Alternative A, we disagree that "structural diversity of vegetation" (not patch diversity or "edge effect") will be less in a succession of natural vegetation that would occur without this project, as compared to structural diversity in agricultural fields managed for small grain crops.
	m	7. Under the no action alternative, we see no need for the soils to be fertilized, "conditioned" or

		stabilized. This claimed benefit of the agricultural lease is questionable.
	n	8. “Healthy relationships” between landowners and FWP should be based upon mutual trust and respect, not on diverting public resources from optimal public benefits to private uses.
	o	Please consider the above comments in evaluating the Isaac Homestead agricultural lease. Since WMAs are relatively rare on the landscape, we must maximize their value in achieving our wildlife goals. Moreover, public funds and other resources should be used as efficiently and effectively as possible. We are under no illusion that this is a simple request. Sincerely, Glenn Hockett Volunteer President Gallatin Wildlife Association

APPENDIX B
HAND WRITTEN PUBLIC COMMENTS – ISAAC HOMESTEAD
WMA AGRICULTURAL LEASE
JANUARY 30 – FEBRUARY 20, 2013



Paula A. Soliski
657 Willow, Box 1491
Forsyth, Montana
59327-1491

406 356-7398 hm
406 346-7555 wk

Jeremy Banfield
P.O. Box 467
Forsyth, Montana
59327

Jeremy,

In reviewing the Montana, Fish, Wildlife & Parks Environmental Assessment (Agricultural Lease on portion of Isaac Homestead Wildlife Management area) presented by MFW&P Wildlife Biologist Jeremy Banfield, I would like to go on record of being in favor of the proposed actions. With this lease there is an opportunity to grow crops, saving back 20% of the yield to enhance Wildlife sustainability — it is a WIN. WIN. To increase the winter food resource for our wildlife is good sound thinking put into action. All the effects on land, water, air, Vegetation and Fish/Wildlife listed in the report, I see very minimal impacts. This proposed lease is sound management.

Paula A. Soliski
Sec/Treas. Rosebud-Treasure Wildlife Assoc.

The Environmental Assessment was well prepared and easy to understand.