



Montana Fish, Wildlife & Parks

Decision Notice

Fresno Reservoir Wildlife Management Area Grazing Lease Extension

Montana Fish, Wildlife and Parks
Region 6
54078 Hwy 2 West
Glasgow, MT 59804
406-228-3700

March 25, 2013

Proposed Action

Montana Fish, Wildlife and Parks (FWP) proposal is to extend the grazing lease for the Fresno Reservoir Wildlife Management Area (WMA) for two years until September 15th, 2014.

Fresno Reservoir WMA consists of approximately 2,640 acres of mixed grass prairie, riparian, and wetland habitats. It is located 23 miles northwest of the town of Havre, in Hill County. The WMA is west of the Milk River upstream of Fresno Reservoir. Grazing on the WMA is currently managed in a three-pasture rest-rotation grazing system with a maximum stocking rate of 300 Animal Unit Months (AUMs). Through the proposed lease extension, grazing would continue under these parameters until September 2014.

During the first year of the 2-year lease extension, FWP intends to complete a new management plan for Fresno Reservoir WMA, which will consider the management needs of the WMA with the goal of maximizing wildlife production and recreational opportunities. This planning effort will consider the role of livestock grazing and the condition of upland, riparian, and wetland habitats, among other WMA management components.

Alternative to the Proposed Action

Under the no action alternative, the grazing lease for Fresno Reservoir WMA would not be extended. There would be no livestock grazing on the Fresno Reservoir WMA in 2013. The absence of grazing would increase residual grass cover and vegetation heights, which would provide additional nesting cover for upland nesting birds. In the long-term, the absence of grazing may reduce the availability, palatability, and vigor, and nutrient value of vegetation for ungulates and other herbivores. The long-term absence of grazing could result in an increase in fire fuels and wildfire risk. There would be a loss of revenue from the termination of the grazing

lease. There would be some decreased maintenance costs related to administration and monitoring of the grazing system if the grazing lease is not extended, but there would be a loss of revenue generated by the grazing lease and increased costs for boundary fence maintenance and weed control.

Montana Environmental Policy Act (MEPA) Process

FWP prepared a draft environmental assessment (EA) pursuant to MEPA and is required to assess the potential impacts of the alternatives to the human and physical. FWP mailed 16 copies of the EA to surrounding landowners, Hill County commissioners, and local officials. Electronic notifications of the EA's availability were also made to 11 other individuals, agencies, and interested parties. The EA was open for a 30 day public comment period that ran from February 15th to March 16th. The EA was also available for public review on the FWP website and at the Havre Area Resource office and the FWP Regional office in Glasgow.

Legal notices informing the public of the Fresno Reservoir Grazing Lease Extension EAs availability and opportunities for public were published in the Great Falls Tribune (2/27 & 3/6) and in the Havre Daily News (3/1 & 3/8). A statewide press release was also distributed. Newspaper articles on the EA and proposed action were run in the Havre Daily News, Great Falls Tribune, and Billings Gazette.

A public hearing to explain the proposal, answer questions, and take public comments was held on March 7th, 2013 in Havre at the Hill County Electric Hospitality Room. The meeting was attended by 14 people.

Summary of Public Comment

FWP received 15 written comments from 18 people/groups. Thirteen comments were from private individuals. Two comments were received from individuals representing groups/organizations. Eleven of the comments (73% of the total) were in support of the proposed grazing lease extension. The most common reasons given for supporting the grazing lease extension were:

- 1) Current management and rest-rotation grazing system has improved the vegetation, habitat quality, and wildlife value.(7)*
- 2) Grazing decreases fire fuels and reduces wildfire risk.(6)
- 3) Grazing improves habitat for wildlife. (5)
- 4) The current lessee's maintenance and livestock management have benefited the WMA and surrounding landowners.(5)
- 5) The current grazing lease benefits FWP by reducing maintenance costs.(3)

*(the number in parenthesis represents the number of comments received for each topic).

There were four individuals/groups (27% of the total) in opposition to the grazing lease extension on the Fresno Reservoir WMA. The primary categories of comments received were:

- 1) Due to the potential loss of land enrolled in the Conservation Reserve Program and the high percentage of grazing and agriculture in the surrounding landscape, WMA management should maximize ungrazed vegetation. (4)*
- 2) Concerns over impacts of livestock grazing on woody vegetation and riparian areas.(3)
- 3) Concerns over impact of grazing on winter cover for pheasants.(2)
- 4) Concerns over impacts of grazing on nesting cover for upland nesting birds.(2)
- 5) The current rate charged for grazing is below market value and should be increased.(2)

*(the number in parenthesis represents the number of comments received for each topic).

FWP Responses to Public Comments

There were a variety of issues raised at the public meeting and through comments submitted. The following is a summary of the issues raised and the responses to these comments.

Comment 1 -- Termination of the grazing lease would result in increased costs for boundary fence maintenance and weed control.

FWP Response – FWP agrees with this comment. The current lessee is primarily responsible for these maintenance activities in order to receive the lower FWP grazing rate. If the grazing lease is not extended, FWP would assume the responsibility for fence maintenance and weed control on the WMA. There are approximately 11 miles of boundary fence. The increased maintenance responsibilities would increase the resources (e.g., employee time, funding, and supplies) that would be required to maintain the property.

Comment 2 -- Due to the potential loss of land enrolled in the Conservation Reserve Program and the high percentage of grazing and agriculture in the surrounding landscape, the WMA should be managed for ungrazed vegetation.

FWP Response – FWP agrees that the majority of private land in northern Hill County is in crop production and FWP recognizes the importance of maintaining native habitats. The rest-rotation grazing system, as applied to the Fresno Reservoir WMA, ensures that pastures receive different grazing treatments annually, which supports the health and productivity of native grassland vegetation. Rotated grazing treatments also provide a diversity of grass heights that are preferred by a variety of upland nesting grassland birds. There are also tracts of land enrolled in CRP adjacent to the WMA that provide additional ungrazed cover for wildlife. Per state statute 87-1-201 (9iv), the Department is required to address fire mitigation for any WMA in excess of 50 contiguous acres. Through the utilization of cattle grazing, FWP is reducing fire fuels at the WMA, thus reducing the risk of wildfire within the WMA.

Comment 3 – Livestock grazing, particularly during the late summer can degrade willow and riparian habitats. Livestock grazing can impact the succession of riparian vegetation. Woody vegetation provides important winter cover for pheasants.

FWP Response -- Livestock grazing can negatively impact riparian vegetation. The duration, timing, and amount of use are all factors that can influence the impacts of livestock grazing on riparian vegetation. The rest-rotation grazing treatments established by the current grazing system are intended

to ensure that the growing season, deferred later summer grazing, and rest treatments distribute grazing impacts and follow-up rest periods for plant recovery through time. Based on historic aerial photos, riparian woody vegetation has increased substantially over the last 20 years. In addition, during the short-term extension of this lease grazing impacts on riparian vegetation are expected to be minor. Hydrologic changes during high water events in 2011 have caused most woody riparian areas to remain flooded for almost entire grazing season. The current condition of native vegetation, including riparian habitats, will be evaluated in conjunction with development of a management plan for the WMA.

Comment 4 – Livestock grazing can decrease quality of nesting cover for upland nesting game birds (pheasants, Hungarian partridge, sharp-tailed grouse, and waterfowl).

FWP Response – As was acknowledged in the EA (pages 8-9), livestock grazing does result in a reduction in vegetation height, resulting in less structural cover, and for some game bird species, reduced nesting habitat quality. The growing season grazing treatment, which overlaps with the majority of nesting activities, is restricted to 1/3rd of the grazed area, which allows the other 2/3rds to produce maximum potential grass height and structure for a given growing season. As a longer term benefit, periodic grazing disturbance enhances plant productivity and vigor, which can enhance nesting cover for the pastures that receive deferred and rested grazing treatments.

Comment 5 – The current grazing rate is below the market value for private land grazing rate and should be increased.

FWP Response -- FWP disagrees because the current lessee does provide maintenance on the WMA. The lessee is responsible for fence maintenance, weed control, and assists in wetland water management if needed. In exchange for providing these maintenance responsibilities, FWP charges the lessee the lower FWP grazing rate, which is equal to the DNRC grazing rate

Comment 6 – Failure to extend the grazing lease would have a negative impact on the lessee, neighboring landowners, and the local economy.

FWP Response -- FWP appreciates this observation. The scope of the EA is focused on possible the 2-year extension of the current lease agreement. As the analysis in the EA acknowledged, the extension of the lease benefits both the lessee and FWP.

Comment 7 -- Failure to extend the grazing lease would result in a loss of revenue for FWP

FWP Response -- FWP agrees. The loss of revenue from the grazing lease was addressed in the EA (page 14), as well as the recognition of the increased costs to the Department for maintenance components at the WMA that are currently covered by the lessee.

Comment 8 -- Concerns over the ability of FWP to maintain its properties if this lease is not renewed

FWP Response-- FWP has two full-time employees in Havre whose responsibilities include WMA maintenance. The primary maintenance activities on this WMA would be maintenance of boundary fences in addition to ongoing weed management. Regardless of the alternative selected, FWP would work with surrounding landowners to ensure boundary fences are maintained. Weed problems on this

WMA have been relatively minor, but future weed outbreaks would be controlled by FWP personnel or through contract with the Hill County Weed Department if needed. FWP would be committed to all other routine maintenance of the property as well.

Comment 9 -- Revenue generated by grazing lease will not cover the additional monetary and personnel costs required to manage the lease.

FWP Response -- There are potential monetary costs associated with administration of this grazing lease including FWP employee time, supplies, and equipment costs. Since the lessee has conducted the majority of the fence repair and weed control over the past 21 years, the administrative costs associated with the grazing lease have historically been nominal. In addition, management expenses including boundary fence maintenance, weed control, and employee time would all increase if the lease is not extended.

Comment 10 – The Fresno Reservoir WMA is dominated by short grass species and does not provide good nesting cover for upland nesting birds and grazing has little to no effect on marshland.

FWP Response -- Upland nesting game birds do prefer more robust vegetation heights and structure. There are areas on the WMA dominated by blue grama and other grass species of short stature. There are other areas with higher densities of western wheatgrass, needlegrass, and other “taller” grass species that can provide quality nesting cover for upland nesting game birds. While grazing can have impacts on wetlands, the stocking rate and rotation of grazing treatments has helped reduce impacts. Grazing impacts will be evaluated in conjunction with development of a management plan for the WMA.

Comment 11 – We suggest FWP focus management actions that favor mule deer rather than white-tailed deer, as we are concerned about the precipitous drop in mule deer numbers around the State as well as around the Western U.S. and Canada. For example, we support either-sex white-tailed deer hunting in this area, but suggest that mule deer hunting should be limited to bucks only.

FWP Response: This comment is outside the scope of this environmental assessment.

Comment 12 -- Livestock grazing can be detrimental to many species of waterfowl when not carefully controlled.

FWP Response -- As was stated in the EA, grazing can reduce vegetation height and structure. However, grazing on the WMA is controlled through a rest-rotation grazing system and a conservative stocking rate. The light-to-moderate grazing intensity and current grazing system provides deferred and rested pastures that provide increased vegetation heights and cover.

Comment 13 – We would like to see the needs of antelope considered in the WMA management plan.

FWP Response -- Pronghorn antelope are an important wildlife species in this Region and valuable game species for sportsmen. There has been very little documented use of this area by pronghorn antelope, which is why pronghorn antelope were not included as a management priority under the original management plan. We will consider your comment as FWP staff draft a new management plan for the WMA.

Comment 14 -- How is the warm water fishery on the Milk River in this area? Can FWP take any steps to enhance the habitat for warm water fish on the WMA?

FWP Response -- This comment is outside the scope of this EA. Information about the Milk River and its fishery can be obtained through the FWP website or by contacting the fisheries staff at the Havre Area Office.

Comment 15 – Are photos or wildlife surveys available documenting habitat conditions prior to and after grazing on the WMA?

FWP Response- FWP does not possess photo points, wildlife surveys, or vegetation surveys prior to the implementation of the current grazing system in 1992. There are currently no photo points established on the WMA to show yearly vegetation conditions after livestock use. Vegetation condition and review of possible grazing impacts will be conducted in conjunction with development of a management plan for the WMA. Aerial photos are available of the area that document large scale habitat changes.

Comment 16 -- The EA provides no reference to any literature supporting this use of livestock grazing for wildlife. I am aware of considerable literature indicating negative impacts of livestock grazing to wildlife.

FWP Response -- The impacts of livestock grazing on wildlife species is highly dependent on the intensity of grazing pressure and season of use. Overgrazing can have long term detrimental impacts on wildlife habitat. The rest-rotation grazing system in place on this WMA and the conservative stocking rate helps avoid any potential long-term negative impacts from overgrazing. Grazing has been shown to have the potential to improve the palatability and vigor of vegetation, resulting in an increase in habitat use by ungulates (Willms et al 1979, Anderson & Scherzinger, 1975; Jourdonnais, 1985). As mentioned in the EA, grazing reduces vegetation heights and structure which can benefit long billed curlew (Bicak et al 1992), prairie dogs, chestnut collared longspur (Ryder 1980), and McCown's longspur (Kantrud 1981). The diversity of grazed, deferred, and rested pastures provides for a mix of cover heights, which accommodates a mix of upland nesting bird species (VerCauteren and Gillihan 2009) and other wildlife (Krausman et al. 2009).

Comment 17 – The management priority for this WMA should be wildlife, and should not prioritize allowing an area rancher to maintain his/her existing livestock operation

FWP Response -- As was stated in the EA, the management priority for this WMA is to maximize wildlife habitat and recreational opportunities. Livestock grazing is a management tool that under the right conditions can be used to improve wildlife habitat quality. As part of the environmental assessment process the impacts on land use and the local community are included in the evaluation. FWP will be developing a management plan in the upcoming year that identifies the management objectives of the WMA and strategies for accomplishing objectives.

Comment 18 – Why is the grazing on this WMA being evaluated at this time and is this occurring statewide or just for this WMA?

FWP Response – FWP’s lease out policy requires an EA for lease renewals, which is the case with this situation. This is a statewide policy and is not limited to just this WMA.

Comment 19 -- Has there ever been any concerns or directives expressed by the Bureau of Reclamation concerning their leases with FWP and/or third party leases?

FWP Response -- The original development of the rest-rotation grazing system on this WMA was developed with Bureau of Reclamation involvement. There were no comments submitted by the Bureau of Reclamation during the comment period on this lease, but BOR staff did attend the public meeting.

Comment 20 -- Who is responsible for the maintenance of the current fence system?

FWP Response -- The current lessee does provide maintenance on the WMA. The lessee has been the primary individual responsible for fence maintenance, weed control, and assists in wetland water management if needed.

Comment 21 -- Does the BOR or FWP pay property taxes on these acres?

FWP Response – FWP leases the property from the BOR. The BOR does not pay county property taxes – they have an exempt status.

Comment 22 -- Concerns were raised that the future management plan for this area be based on sound science and not be influenced by political issues. There were also comments encouraging transparency and public involvement in the development of this management plan.

FWP Response -- The updated management plan for this WMA will be available to the public for comment and input. The management plan will identify science-based management strategies designed to achieve the wildlife habitat and recreation objectives identified in the plan.

Comment 23 -- Will there be range land specialists involved in the building of the new management plan/plans not just wildlife biologists?

FWP Response – Wildlife personnel from the local, regional, and statewide levels are directly involved when FWP updates individual WMA management plans. The FWP wildlife habitat management biologist, plant ecologist, and habitat bureau section chief will be working together with the local wildlife biologist and regional wildlife manager to update this plan.

Comment 24 -- Are documents related to management of this WMA (e.g. management plans and cooperative agreements with the Bureau of Reclamation) available to the public?

FWP Response – These documents are available and can be viewed by contacting FWP’s Havre Area Resource Office.

Comment 25 – One comment raised concerns that livestock grazing could have negative impacts on mule deer (e.g., decreased fawn survival, displacement, habitat modifications).

The rest-rotation grazing system, as applied to the Fresno Reservoir WMA, ensures that pastures receive different grazing treatments annually, which supports the health and productivity of native grassland and riparian vegetation. Rotated grazing treatments also provide a diversity of grass heights. Areas with increased grass height and structure are present for fawning and additional areas with increased palatability and vigor of vegetation are also available. The rotational nature of the grazing system ensure livestock are absent from 2/3 of the property at any one time during the grazing season. There is no livestock use of the WMA from September 15 through May 15. The rest-rotation grazing treatments established by the current grazing system are intended to ensure that the growing season, deferred later summer grazing, and rest treatments distribute grazing impacts and follow-up rest periods for riparian shrub vigor through time.

Comment 26 -- Is this area historic sage grouse habitat? While we doubt sage grouse can be successfully re-established in this area due to the large degree of habitat fragmentation due to extensive farming are there any areas in Hill County FWP is working on this at all?

FWP Response – This area is historic sage grouse habitat, but there currently are no known greater sage grouse populations in this area. FWP has worked to conserve important native sagebrush habitats and promote connectivity between greater sage grouse populations in Montana and Canada.

Literature Cited

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Willms, W, Mclean, A., Tucker, R. and Ritchie, T. 1979. Interactions between mule deer and cattle on big sagebrush range in British Columbia. J. Range Management 32:299–304.

Decision

Based on the Environmental Assessment we have determined that the proposed action will not have significant effects on the human and physical environment associated with this action. Therefore an environmental assessment (EA) is the appropriate level of analysis for this project.

The extension of the grazing lease for the Fresno Reservoir WMA for two years would continue livestock grazing under the current rest-rotation grazing system. The lessee would be able to graze the WMA with a maximum of 300 AUMs from May 15th-September 15th.

After review of this proposal and the public comments submitted, it is my decision to accept the Decision Notice and Draft Environmental Assessment as final and to recommend the extension of the grazing lease on the Fresno Reservoir WMA.

The Record of Decision will be available for public viewing on the Montana Fish, Wildlife, and Parks website at: <http://fwp.mt.gov/news/publicNotices>. Copies of the EA and Record of Decision may also be obtained by contacting the Fish, Wildlife and Parks Havre Area Office, 2165 Hwy 2 East, Havre, MT 59501 (406-265-6177).



Steve Dalbey
Acting Region 6 Supervisor

Appendix A-Fresno Reservoir Wildlife Management Area Grazing Lease-Public Comments

Comments		
1	a	It is stated in the EA that grazing helps to reduce the risk of wildfires...as a fire fighter this is a critical point that has been made. The reduction of fuel makes it safer to fight and gives a small fire department such as Kremlin's a chance to put it out before property or life is threatened.
	b	To my understanding, the potential reasoning for these terminations is to increase bird habitat. To be quite honest the CRP program has done far more to help bird and wildlife habitat than ANY of these WMAs. As an outdoorsman, I thank all farmers and ranchers for their participation and general will to help in that manner. Granted, wildlife habitat wasn't the only factor in when entering into the decision used by many when entering into the CRP program, but it was a major factor. I grew up near the Milk River and cannot even once remember hunting the "breaks" for birds...it wasn't worth our time, no birds. This was during a time span when there was no grazing allowed on a nearby WMA. We hunted birds where they fed, up near the farm fields and shallow ponds.
	c	The current lessee is one of the most responsible and observant operators in the cattle business
	d	Will FWP provide a copy of their lease agreement and memorandums with the Bureau of Reclamation
	e	Why did this suddenly come about just days after the FWP renewed their long-term lease with BOR? Is it in retaliation for some of us closing our land to hunting after the Milk River Ranch Purchase.
	f	Is the potential elimination of this grazing lease just for this WMA or is it for all of them?
	g	"IN addition, the Montana Fish, Wildlife, and Parks lease-out policy requires the completion of an environmental assessment (EA) before a decision is made to lease or extend or renew a lease." IS this supposed to have been done every time a WMA lease is renewed or just when there is pressure to not renew the leases.
	h	"The BOR also maintained authority for approving leases, licenses, permits, and contracts between FWP and third parties." Has there ever been an concerns or directives expressed by the BOR concerning their leases with FWP and/or third party leases.
	i	Who is responsible for the maintenance of the current fence system?
	j	Does the BOR or FWP pay taxes on these acres? The reason I ask is that if there is a wildlife on theses acres we a volunteers are expected to fight it...every other land owner in our fire district pays a small tax to aid in the protection of their life and property.
	k	How can you assure me that the new management plan will not be bias toward the FWP? I am skeptical...understandably so after the lack of the democratic process that occurred with the Milk River Ranch acquisition.
	l	Will there be range land specialists involved in the building of the new management plan/plans not just wildlife biologists
	m	How many acres does FWP have in WMA's in the State of Montana? How many employees do you have to manage those WMA's?
	n	Do you have plans to do an economical evaluation of these WMA's also?
	o	Can you provide a copy of the existing management plan for the Fresno Reservoir WMA?
2	a	I oppose renewing this grazing lease for private livestock on the Fresno Wildlife Management Area for the following reasons:

2	b	1. The EA provides little, if any, basis for concluding that cattle grazing will enhance wildlife or wildlife habitat on the WMA, especially for focal species (waterfowl, pheasants, white-tailed and mule deer, and upland nesting birds). The EA provides no reference to any literature supporting this use of livestock grazing for wildlife. I am aware of considerable literature indicating negative impacts of livestock grazing to wildlife through removal of cover for nesting and hiding, competition for forage, social displacement, and long-term effects on vegetation and stream banks. While this grazing has been conducted for 20 years, no data are presented to indicate short- or long-term impacts on wildlife numbers or frequency of wildlife use of the area. Use of livestock grazing in this way is questionable and must be evaluated, using a planned collection of data in a management experiment.
	c	2. The map in Appendix C suggests that agricultural land with livestock grazing is abundant surrounding the WMA. This suggests that such habitat is not limiting to wildlife in the area. Providing a few square miles of habitat that is not intensively grazed should add habitat diversity on a landscape level.
	d	3. Description of the no-action alternative is inadequate. A description of vegetation succession, especially in riparian areas, that would occur without livestock grazing is needed and I believe would suggest considerable ecological benefit.
	e	4. I question if the DRNC grazing rate is the fair market value for AUMs. Generally, private AUMs sell for more than this rate.
	f	5. While the grazing opportunity will allow an area rancher to maintain his/her existing livestock operation, FWP is not a welfare agency. Sportsperson's land and dollars are not intended for this purpose.
3	a	Seems to me that with the loss of so much CRP, the FWP would want to sustain as much natural grass as possible for the species that are being impacted by CRP loss. Namely the deer, antelope, and game birds and every other species that lives here. Where else do they have to go???? A WMA should be used for exactly that, wildlife, not cows for someone's profit.
4	a	FWP Goal: The goal of FWP management of this property is to maximize wildlife benefits by enhancing the quality and quantity of the wildlife habitat in this area and to provide recreational opportunities. The species identified in the EA (page 3) as the primary management focus for this WMA are waterfowl, pheasants, white-tailed deer, and upland nesting birds. We support this goal. However, we suggest FWP focus management actions that favor mule deer rather than white-tailed deer, as we are concerned about the precipitous drop in mule deer numbers around the State as well as around the Western U.S. and Canada. For example, we support either-sex white-tailed deer hunting in this area, but suggest that mule deer hunting should be limited to bucks only. Perhaps, the mule deer buck harvest needs to be limited as well to reverse the declining trends for mule deer (Geist and Francis 1990). What have the mule deer vs. white-tailed deer trends in this area been over time? Regarding meeting the wildlife management goal, what is the limiting factor for native upland game birds, pheasants, waterfowl, mule deer and even white-tailed deer in this area? Isn't the surrounding landscape largely intensively farmed and/or grazed by livestock? It seems to us providing more cover and forage through increased rest and/or protection from livestock use is warranted if the objective is to improve upland game bird, pheasant and waterfowl nesting and brood rearing cover and forage. This is true as well to provide better mule deer or even white-tailed deer habitat for fawning, forage and cover. The spring, summer and fall livestock use treatments appear in conflict with achieving this goal.

4	b	<p>Native Willow, Cottonwoods and Riparian Vegetation Concerns: We also encourage FWP to promote the abundance and vigor of the native willow, cottonwoods and other likely rare riparian vegetation along the Milk River corridor. These areas can provide much need security and winter cover for all the wildlife species mentioned. What impact has the livestock use over the last 21 years (since 1992, page 3, EA) been on these native riparian species as compared to when the area was not utilized by livestock (1976-1992)? Do you have photos you could present in the final EA of the livestock impacts after each season of use to both the uplands and riparian areas? Do you have any photos of the area after the extended rest period (1976-1992)? That would help us evaluate your proposal to extend the livestock lease agreement for another 2 years. We are especially concerned about the late season livestock use treatment to the riparian areas, both to wetlands and the Milk River corridor, especially in dry years, which is typical in this area. The Havre area is known for its hot, dry summers. Thus, livestock congregate in the few areas with any water and green vegetation or woody vegetation left in the summer and early fall. I have personally seen livestock completely eliminate willow stands in the Havre area from late summer/early fall livestock use. Summer and early fall livestock use on the WMA will likely congregate cattle along the Milk River and any remaining riparian-wetland areas, certainly degrading these areas for future wildlife use.</p>
	c	<p>Mule Deer: Cattle compete with mule deer for food, space and water while decreasing the amount of cover available for fawning (Kie et al 1991). Summer forage conditions can be critical to fawn survival, body growth and condition, and accumulation of fat reserves among adult deer (Wood et al. 1989). Cattle also displace mule deer from preferred habitats, especially from riparian/meadow areas in the late summer (Loft et al 1991). Loft et al (1991) found that mule deer use of meadow-riparian habitat was positively correlated with standing herbaceous vegetation in meadow areas and hiding cover in willow (<i>Salix</i> sp.). Cattle use had a negative influence on these variables. Significant reductions in willow cover occurred late in summer as cattle moved into willow stands to forage within the canopy when herbaceous forage had been depleted in open meadow areas. Under these circumstances, forage conditions were most limiting on the summer range for mule deer, and deer responded with their greatest reduction in selection of preferred meadow-riparian habitat.</p>
	d	<p>Ducks: Livestock grazing has also proven quite detrimental to many species of waterfowl when not carefully controlled (Braun 1978). Furthermore, Kaiser et al (1979) found native plant communities in high condition with matted mulch had the highest nest success and nest density for blue-winged teal on a waterfowl production area in southeastern South Dakota. In Phillips County Montana, duck production was compared in two rest-rotation cattle grazing systems and a “normally grazed” area from 1968 to 1970 (Gjersing 1975). Pair populations generally increased in pastures excluded from cattle grazing the previous year and decreased in pastures grazed the previous fall. In eleven of 12 instances complete rest or grazing only during the spring and early summer resulted in an increase in the number of duck broods the following spring. In five of eight instances, grazing during the summer and fall resulted in a decrease of broods the following spring.</p>

4	<p>e Pheasants: Pheasant nests in undisturbed, residual cover have the best chance of hatching successfully (Weigand and Janson 1976). When high quality cover is unavailable, hens will nest in almost any cover present. However, nests in marginal cover have little chance of hatching and in many cases the life of the hen nesting under these conditions is in jeopardy. We assume that high quality nesting cover for pheasants is often limited in this area do to the high amount of agricultural production and livestock use on the surrounding private lands. Is this an accurate assumption? Is so, we feel the Fresno WMA should be managed to enhance pheasant and other upland game bird nesting cover. Weigand and Janson (1976) documented the earliest recorded pheasant nest (at the time of publication) was April 15th. They note nesting activity peaks during the first half of May, although this will vary somewhat with location. The latest nesting activity they recorded was on September 13th. They also note a majority of original pheasant nests each year are destroyed by predators, farming operations, grazing livestock and weather. While hens will often attempt to re-nest, the number of eggs per clutch decreases by one or more eggs with each successive nesting attempt. An average first clutch of 10 eggs may be reduced by half in third and fourth nest attempts. Each pheasant hen will produce only one brood each summer, but because of re-nesting attempts young chicks may be observed May to September. Thus, while the hatching peak is usually in mid-June, cover and forage conditions remain important to young pheasant chicks throughout the year. On page 15 of Weigand and Janson (1976) they display two photos, one of a pothole area protected from livestock use and one of an area subjected to livestock use. They ask the rhetorical question – which do you think is most valuable for pheasants? Clearly, the area protected from livestock use provides the better habitat conditions for pheasants. Furthermore, vegetative cover is often severely reduced in the fall in typical pheasant habitat due to the harvest of agricultural crops and livestock grazing on private lands. From the maps provided in the EA (page 21), that appears to be the case near the Fresno WMA. While pheasants will take advantage of whatever cover is available, “heavy” protective cover becomes exceedingly important as winter approaches and it does not appear that surrounding land uses are providing that cover. Losses of more than 90% of local pheasant populations have occurred during severe blizzards in Montana and other Great Plains States (Weigand and Janson 1976). Thus we encourage FWP to select the alternative that provides the most cover for pheasants and other wildlife, both in the short and long term.</p>
	<p>f Weigand and Janson (1976) documented the earliest recorded pheasant nest (at the time of publication) was April 15th. They note nesting activity peaks during the first half of May, although this will vary somewhat with location. The latest nesting activity they recorded was on September 13th. They also note a majority of original pheasant nests each year are destroyed by predators, farming operations, grazing livestock and weather. While hens will often attempt to re-nest, the number of eggs per clutch decreases by one or more eggs with each successive nesting attempt. An average first clutch of 10 eggs may be reduced by half in third and fourth nest attempts. Each pheasant hen will produce only one brood each summer, but because of re-nesting attempts young chicks may be observed May to September. Thus, while the hatching peak is usually in mid-June, cover and forage conditions remain important to young pheasant chicks throughout the year. On page 15 of Weigand and Janson (1976) they display two photos, one of a pothole area protected from livestock use and one of an area subjected to livestock use. They ask the rhetorical question – which do you think is most valuable for pheasants? Clearly, the area protected from livestock use provides the better habitat conditions for pheasants. Furthermore, vegetative cover is often severely reduced in the fall in typical pheasant habitat due to the harvest of agricultural crops and livestock grazing on private lands. From the maps provided in the EA (page 21), that appears to be the case near the Fresno WMA. While pheasants will take advantage of whatever cover is available, “heavy” protective cover becomes exceedingly important as winter approaches and it does not appear that surrounding land uses are providing that cover. Losses of more than 90% of local pheasant populations have occurred during severe blizzards in Montana and other Great Plains States (Weigand and Janson 1976). Thus we encourage FWP to select the alternative that provides the most cover for pheasants and other wildlife, both in the short and long term.</p>

4	g	<p>Hungarian Partridge (Huns): Huns do not start laying their eggs until late May or early June and with a 24 day incubation period Mussehl and Howell (1971) determined their peak hatching to occur from June 19 through July 9. Mussehl and Howell (1971) mention the “soil bank lands” (from 1959-1964) benefiting partridge by providing an abundance of weed seeds, insects (a favorite summer food) and also excellent nesting cover. These lands were highly erodible farm lands that were seeded back to perennial vegetation similar to our current Conservation Reserve Program. While partridge are introduced and normally thrive in disturbed environments with lots of edge, heavy grazing from livestock is a common cause of reduced food sources and protective cover (Mussehl and Howell 1971). Weed spraying also destroys food and cover plants for Huns. Thus, we conclude there is already plenty of edge provided by the surrounding farm lands and livestock pastures adjacent to the WMA (see map EA, page 21). We suggest the WMA is best managed to provide dense nesting cover and undisturbed brood rearing habitat for all upland game birds (including Huns) as well as nesting waterfowl.</p>
	h	<p>Sharp-tailed Grouse: Sharp-tailed grouse used areas with 11” of average herbaceous cover on their brood range in eastern Montana (Brown 1961). This paper discusses and documents the importance of adequate herbaceous cover to brood rearing sharp-tailed grouse. In only one of 20 plots surrounding brood locations was the average height of vegetation less than 10”. The author gave this as one reason sharp-tailed broods were difficult to observe, and more importantly, noted that brood rearing areas fulfilling these herbaceous cover requirements were at a premium. We doubt FWP can provide these kind of conditions consistently for sharp-tailed grouse under the current livestock management system. Again, we suggest the WMA is best managed to provide dense nesting cover and undisturbed brood rearing habitat for all upland game birds that use the WMA as well as nesting waterfowl.</p>
	i	<p>Sage Grouse: Is this area historic sage grouse habitat? While we doubt sage grouse can be successfully re-established in this area due to the large degree of habitat fragmentation due to extensive farming are there any areas in Hill County FWP is working on this at all?</p>
	j	<p>Pronghorn Antelope: What about antelope? Aren’t they an important component of this landscape? We realize antelope are a far ranging species but we would like to see the needs of antelope considered in future planning on this WMA.</p>
	k	<p>Warm Water Fishery: How is the warm water fishery on the Milk River in this area? Can FWP take any steps to enhance the habitat for warm water fish on the WMA?</p>

4	1	<p>Wildlife Management Planning: The EA notes on page 2 & 19 the livestock lease extension will provide a window of time for FWP to develop a management plan for Fresno WMA that will include an evaluation of the use of livestock grazing and other management options. During the first year of the 2-year lease extension, FWP intends to complete a new management plan for Fresno Reservoir WMA, which will consider and prioritize management objectives for the WMA in terms of providing productive wildlife habitat and hunting recreation. We appreciate this commitment from FWP to develop a Wildlife Management Plan for the Fresno Reservoir WMA in the next 2 years. FWP further states the planning effort will consider the role of livestock grazing and the condition of upland, riparian, and wetland habitats, among other WMA management components (EA, page 2). First we suggest FWP forgo livestock use over the next 2 years to see how the WMA and the wildlife respond in the interim. Second, we also suggest if FWP finds livestock use to be a suitable “tool” for enhancing wildlife habitat and/or populations for any reason, FWP use factual, scientific information as the basis for this decision. Based on our experiences in the field and our review of the pertinent science, we find very little evidence that suggests the presence of livestock on important wildlife habitat is beneficial. To the contrary, the presence of domestic livestock is usually competitive in nature, rather than beneficial (Fleischner 1994). Furthermore, livestock impacts go far beyond just grazing impacts to the vegetation. Many wildlife species are displaced from preferred habitats by the mere presence of livestock in the area (see our detailed comments to the Beartooth, Fleecer and Robb-Ledford WMAs). We urge FWP to be very careful and limited in their use of domestic livestock to manipulate habitat and/or to enhance wildlife populations on this and/or other WMAs moving forward. If FWP chooses to use livestock as a habitat or wildlife population enhancement “tool”, we suggest a more prescriptive and cautious approach to this use is warranted in the future.</p>
	m	<p><u>Fair Market Value: Finally if FWP proceeds with a livestock use alternative we suggest FWP charge fair market value for this use. We are concerned FWP is not receiving fair market value for this livestock lease on the Fresno Reservoir WMA. The EA, page 5 notes FWP receives “the DRNC rate” which was \$7.90/AUM in 2012 (AUM = the amount of forage to feed one cow/calf pair for a month). However, the USDA shows the private livestock lease rate in Montana at \$23.60/AUM in 2012 (http://www.nass.usda.gov/Statistics_by_State/Montana/Publications/economic/prices/grazefee.htm). At 300 AUMs removed per year this equals a difference of \$4,710 per year in potential revenue to FWP. Thus, we suggest charging fair market value for any and all livestock use to help recover FWP’s cost in administering this program.</u></p>
5	a	<p>I am for grazing that area. I feel, that the few cattle units in that large of an area, has improved the grass as well as cut down on the fire hazard, that could be caused by over growth. In fact, there were areas that were overgrown by weeds, when we first placed our cattle in the area, and those weeds have disappeared and the grass has thickened and spread. There were areas where the grass was thin, that show new growth, a thickening and spreading. I have observed that by rotating the cattle from one pasture to the next, over the 4 months we have them in there, that we never over graze the area, the soil does not erode and grass has a chance to reseed.</p>
	b	<p>We patrol the pastures, almost daily to keep the cows where they belong and to keep fences repaired. We are glad to pay for the use of this area, at the going price per unit.</p>
	c	<p>is a lot of wildlife in the area, both animals and birds and has, always been. By observing all conservation guidelines, I feel that our use of the fish and wildlife area for four months out of the year, is not detrimental to the wildlife, public or the hunters.</p>

6	a	I am writing in support of the draft environmental assessment put forth pertaining to a grazing lease extension on the Fresno Reservoir WMA. As the current lease holder of 21 years, I feel that I have some insight into the management of grazing on the Fresno WMA. I feel that the benefits of continued grazing on the WMA far outweigh the costs. Following, I will list some points to consider when making the grazing decision.
	b	Revenue. Removing grazing will eliminate the revenue source that helps offset the maintenance cost for fencing on the WMA.
	c	If grazing is removed, there will be an increase in the cost of maintenance of the fencing. In the past we have done the majority of the fencing on the WMA without compensation. Some years this cost is considerable due to major flooding of the Milk River. You might say that without grazing, the fences won't need to be maintained, but at minimum, the perimeter fences will have to be maintained to prevent trespass grazing. In the years before we leased the WMA it was "Trespass Grazed" almost every year due to lack of fence maintenance. To prevent this will also require a higher level of monitoring on the part of FWP officials at added cost of their time.
	d	In the past I have also watched for noxious weeds and have sprayed from time to time for such weeds. This will also have to be taken over by FWP officials at a cost to their time and also for chemicals. It takes a significant amount of time to successfully monitor for noxious weeds.
	e	Under nongrazed conditions, there is a buildup of old grass residue that overtime will develop into a significant fire hazard.
	f	We currently graze the WMA in a 3 pasture rest rotation system. This means that 2 pastures are only grazed for approximately 2 month each year, and the third pasture is completely rested. Our stocking rate is so low, that on an average year it is hard to tell the difference between the grazed pasture, and the rested pasture, except for around water sources and salt sites.
	g	The majority of the grass in the WMA are short grass varieties that do not provide a lot of cover for nesting game birds even on productive years. The original goal of this WMA was for the enhancement of water fowl habitat with the construction of the ducks unlimited dyke. Grazing has little to no effect on marshland.
	h	I feel that the current grazing system has been very beneficial to the grass resource on the WMA. I remember conditions before the WMA was started, when the only thing left after a grazing season was the prickly pear cactus. I have seen significant range improvement in the 21 years that we have implemented the grazing system.
	i	In summary, I feel that the benefits to grazing on the Fresno Reservoir Wildlife Management Area far outweigh the costs. I feel that we have been good stewards of this 2600 acres of public land, and that it would be a mistake to discontinue grazing on this WMA. I write to support the EA as it is written, and hope to be included in the process of deciding the future of the Fresno Reservoir WMA.

7	a	<p>I would like to first start off by introducing myself-- I am Mike Swinney from Gildford, Montana, been here all of my 34 years and hunted here since I was a kid with my dad. My family has farmed here for longer than that and have seen the benefits that crp has done for the game and bird populations up here. I have hunted all the lands up here that have ever been open to hunting and have seen what is on the river where cattle have grazed and where they have not grazed. And I can tell you that where cattle have been grazed is no different than where they have not for game populations. I am excited that you are doing an environmental impact on the Wall grazing lease. As for me and hunting up here it is a great place to live, my kids I have taken alot of game up here in this country. With this said I was raised just the same as the Walls and every other farmer and rancher in this country. We were called to be stewards of the land that God had given us whether it be 1 acre or 10 thousand acres.</p>
	b	<p>There is something to be said for this and I believe that you should take a look at human livelihood before we go putting animals in front of people. I have hunted the land from south of Fresno all the way to the ranch of Aagesons that you just purchased. And I might add that the game is the same from one end to the other. I was just in Circle, Montana, on Wednesday, the 13 of February, and spent 6 hours touring a ranch that has been managed for game and saw way less birds and deer, waterfowl included than I have seen on an average day of hunting the north country in Hill County. And this ranch ran 1000 head of cattle with a running capacity of at least 1500 head. So I just hope that you will see things through a farmer and hunters eyes as I have seen it. These people want what is best for the land. This deals with lives of people and the future of hunting. I have talked with other land owners over all that has been going on and believe that you have both lives at heart. Without farmers and ranchers letting hunters on their land the amount of revenue is less. I thank you for your time and hope that you can see this thing with open eyes and support the farmer/rancher and the hunter in this study and keep them both, if you lose one you lose both.</p>
	c	<p>I also have fought fires where land has not been grazed for long periods of time and seen the devastation that occurs with this. There is no stopping the fire once it gets rolling. Then where does the game go until next year. I just wanted to let you know as hunter and a supporter of FWP that I would rather see a farmer or rancher provide for his family and take care of the land rather than see them gone from this country. I just hope that science will go further than what there data says and look beyond and see what there eyes and heart tells them. Just as one hunter and farm leaser that loves each equally, there is more to it than an EIS.</p>
8	a	<p>We are writing this letter in regards to the possible extension of the current lease agreement that the MFWP has with the leasees Shawn and Jessica Wall. We have known them as friends and neighbors all their lives, we feel they are the kind of neighbors that everyone wishes they had. They are great stewards of the land and would never operate their business in any way that would do harm to the land or any lease they have. They would never overgraze the land nor would they do any damage to it in any other way. You will never find better people to lease this land to. They consentaneously take care of all that they do, if they need to fix the fence, or put cattle back in, the do it immediately and at their own expense. As stated at the information meeting in Havre the way they take care of the lease is a great asset to benefit of all wildlife and game birds that habitat the area.</p>

8	b	I have farmed close to and hunted that WMA nearly all of my life and feel there are more deer , both mule and white-tail, and more upland game birds in the area now than there ever has been. The way Shawn and Jessica Wall have handled their responsibilitys with the lease is the reason for this increase. I would like to reinterate you could find no one better to lease this land to, for the good of the land and the wildlife that call it home, the extension of this lease is the utmost importance.
	c	I also find it VERY interesting that the so called political heads that we elected in office claim they have no responsibility to this issue. "They" have no name or a face. Who actually is responsible for putting this all into play and is feeling the heat from these groups? No one could tell my husband who "They" were so he could find out more information and plea his case to keep it.
9	a	The Fresno Reservoir grazing lease looks better now by far than 20 years ago when the BOR ran it.
	b	The FWP does no have the money or manpower to take care of lands.
	c	You have a great management plan in place and good leasors!
	d	And for the long term. Use your money to buy lifetime easements, get a good piece of land so everyone wins forever.
10	a	I attended the meeting that Fish, Wild and Parks held at Hill County Electric on March 7th in regards to the Fresno Reservoir WMA. I have lived most all of my life within a few miles of this area. As a young person to present I have watched this land go from barren over grazed land to a habitat rich land with abundant wildlife of all kinds. The question of whether or not this land should or should not be grazed speaks for its self. Under the rotation plan that rests the tree pastures, that area part of the Fresno WMA, has paid off for cattle, wildlife and the land itself. The dikes built in the past have helped in most years to hold waterfowl for longer periods of time. I have seen ducks, geese, pelicans and other waterfowl enjoy the habitat created by this project.
	b	I cannot see any signs were grazing cattle has harmed the population of the wildlife in this area. The issue of cattle disturbing nesting game birds and other ground nesting birds is misguided. If you watch cattle graze, when at ease, you will see that they avoid stepping on or grazing near nests. later after the young birds leave the nest they use cow dung as a food resource picking for bugs and other proteins.
	c	Shawn Wall is a great steward of the land he leases from FW&P. He takes pride in keeping this land in prime condition not only for himself, but for all of us. Not grazing this land in my opinion would not be in best interest of FW&P and sportsman both.
	d	By not grazing, there would be less quality food source for wildlife and a much higher likely hood of wildfire. I have helped fight fire three different times that started on nearby land. Thankfully there was little or no wind.
	e	In regards to putting this land up for bid take a close look at the surrounding BOR grazing lands. It's grazed down to dirt quite often. One year the leasee let the cows graze down the pastures to the point that they were forced to eat the cattails down to the ground. People bid this ground up so high that they over graze to try to get their money back. There is no thought about what they will have for grazing next year. This is not what you want. Shawn Wall is the kind of people you want caring for your lands.

11	a	The environmental assessment of 2,600 acre wildlife management area northwest of Fresno Reservoir should include the continuation of grazing rights by Shawn and Jessica Wall. Shawn and Jessica have managed the land expertly. They have maintained the land and provided feed for their cattle.
	b	The cyclic process they employed has protected the environment and enhanced the wildlife habitat.
	c	FWP also profits by the lease money which they can use to continue maintenance of FWP lands.
12	a	Cattle grazing should not be allowed on this small island of game bird, waterfowl nesting, and pheasant, brood rearing cover and feeding area. Grass nesting areas will be diminished by cattle grazing. There is a sea of cattle grazing surrounding this refugia for birds.
	b	Extending cattle use for two years in not compatible for ground nesting who need grass for cover and security.
	c	Cattle grazing should not be allowed on this small island of game bird, waterfowl nesting, and pheasant, brood rearing cover and feeding area. Grass nesting areas will be diminished by cattle grazing. There is a sea of cattle grazing surrounding this ref
	d	Cattle will congregate into the riparian areas seeking temperature relief following there depleting the dryer open areas and moving into the cooler moist riparian areas.
	e	Cattle will eat willows and cottonwood reproduction within those moist bottoms.
	f	Winter upland bird cover is most important to those that do not migrate and cattle will compete for this cover.
	g	The cost of administering cattle on the WMA will not compensate your management.
13	a	I am Jessica Wall, Shawn Wall's wife. I am in favor of the Fresno Reservoir WMA Grazing Extension. At the public meeting March 7th, it was mentioned that certain groups are pressuring the F&G to examine weather or not the cattle on the lease are beneficial to the wildlife or causing harm, to make way for hunters. What no one seems to take into account is that they are causing families to move and re-establish their lives because they lost their livelihood. Shawn and I stand to loose a 1/4 of our income if we loose the lease on the reservoir permanently. We will be facing loosing a 100 yr old farm because we will be unable to afford to keep it! I am sure that no one has even thought of the lives that are being distroyed because someone wants the perfect trophy to hang on their wall. Unfortunately when decisions are made off the cuff because someone has an agenda, lives are permanently changed. I am sure they don't think of that. As it was stated in the meeting, we don't wish to be at odds with anyone, but when the Rancher is being made out to be the bad guy and we have no representation that says otherwise, we have to say something in our defense! The people that are having the issue over this and cattle on the rivers, do they actually understand that their food is not raised in a grocery store? and if they make it impossible for AG families to continue, their grocery store won't have food to sell? Anyway, we should be allowed to keep the lease on the Fresno Reservoir WMA Grazing Extension, even after the two years.
	b	We are helping the cost of the up keep and since the Fish and Game are so short handed all the time we are also good at policing the river and are another set of eyes for these guys. Not to mention the no brainer costs like weed control and the fencing.
14	a	I would like to write this letter stating that I am in support of FWP's proposed extension of the Fresno Reservoir WMA Grazing Lease.

15	a	<p>I attended the meeting the Fish & Game put on at Hill County Electric on March 7th, 2013. It seemed to me everyone in attendance were landowners surrounding the wildlife management area. I have lived 2 miles south of the area my whole life in the early 70's there was just a little brush on this side of river. Sometime in the 70's a small dike was built. It backed up a little bit of water in the spring but dried up fairly quickly in the summer months. It didn't have much effect on waterfowl but really made the brush take off and started cattails growing. There was already quite a patch of willows on the east side of the river with a pretty good herd of whitetail deer and a few ringneck pheasant which soon spread to the wildlife management area. In the 80's a second much bigger dike was built with a flood gate that allowed it to be back filled from the river in the spring when the water was high. But mainly was filled by ice jams when the river was thawing. This really had an impact on waterfowl. About this time Fish & Game biologist Al Rosguard started managing the area installing cement nesting mounds and straw bales. The brush along the river had become a good habitat for white-tailed deer and ring-necked pheasants. Al soon found out that the north boundary fence was a nightmare. A mile long flat with Nine Mile Coulee in the middle of it that was wiped out every year. Patrick construction was hired to install two culverts in Nine Mile Coulee which were washed out and reinstalled 6 out of 7 years before giving up. In the early 90's I assume it was detirmined that there was getting to be to much old growth grass and becoming a fire hazard. Two cross fences were built and Shawn Wall was given a lease to graze cows on a three pasture rotation. As far as I could tell with little effect on waterfowl, deer or upland birds. The cows are off by Sept. 15th interfering with hunting season very little. Over the past five years ice hams and beaver dams have completely flooded the brush and cattails. Along with 3 years EDH or blue tongue forcing the whitetail and upland birds out into the surrounding agriculture fields. If the Fish & Game are worried about habitat something needs to be done with beavers and flooding not cows. The culverts are still laying there. I think cows are not the problem and things should be left as they are.</p>
	b	<p>I have helped Shawn maintain the north boundary fence on more than one occasion along with the middle cross fence at no cost to Fish and Game.</p>
	c	<p>Whatever is decided the north boundary fence will have to dealt with every year.</p>
	d	<p>Over the last 15 years there have been 3 fires in the surrounding CRP. Although I am not an official member of the Kremlin Fire Dept. my brother and I were the first ones there with a water truck. Fish &Game officer Odokoven rode in my truck to one of these fires. Of these 3 fires one burned 50 acres of the management area before it was controlled. Another burned 5 acres. The other was put out before it got to the management are. So it is possible that we can work together.</p>