Montana Association of Conservation Districts

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Dear Governor Bullock:

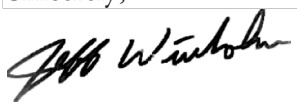
Montana truly is the last best place. We, as farmers and ranchers, see this day in and day out as we work our lands. We are proud of the conservation efforts and improvements we have conducted on our land. We are proud our predecessors were wise in creating and participating in conservation districts and the good work that has resulted on the ground over the past 80 years. We are proud that our ranching heritage preserved the largest intact grassland ecosystem in the United States. More direct pressures and interests loom large over this landscape and history as we look to the future. We continue to build and improve upon the traditions of our ancestors for the sake of our children. It is with respect and this background in mind that we provide the following feedback upon the FWP Bison EIS.

In general, we had difficulty in understanding the goal of undertaking a programmatic EIS when additional EAs and subsequent public input will also be necessary. Instead of providing direction and a better understanding of the process, this process resulted in heightened concern among our members and neighbors due to lack of specifics and clarity in terms of the direction of returning bison to the landscape as wildlife. We were particularly concerned with the lack of economic analysis. There were numerous surveys conducted in more populated areas of the state that indicated that people wanted bison on the landscape. At the same time, in counties such as McCone, local ordinances demonstrate that communities where bison may be located are opposed to these efforts. This was also seen at public meetings where those in more populated areas were poorly attended, as those are not likely sites for reintroduction. The high turnout in Malta was extremely telling, particularly when looking at population density. This is a result of the costs incurred by landowners near possible locations who depend on the land everyday compared to those who want to incorporate bison viewing into their long weekend or vacation. Similarly, landowners have and will continue to put in many hours of time that could be used on their operation to discuss and comment on wild bison on the landscape.

The specifics of scientific issues associated with the EIS are detailed in the following pages. We want to draw attention to the fact that our issues are not specifically with bison, but rather with the proposed new model of bison. We support our neighbors who produce bison. We support the National Bison Range, Yellowstone National Park, and our neighbors in sovereign tribal nations. We are still in the collaborative process of working through conservation issues that result from bison with these groups.

We are farmers and ranchers – Montanans – who have a deep respect for the land and the traditions of our landscape. We understand that we build on the foundation of conservation and stewardship of our forefathers and steward the land for the next generation. The pride we have in our work, and ability to continue in this tradition is threatened by the current Bison EIS and lack of any locally led effort to do so.

Sincerely,



Jeff Wivholm, President
Montana Association of Conservation Districts

General Comment:
We have concerns about hunting and the lack of incorporating the intersection of hunting and fencing. The fencing system used by APR has not been tested under a hunted population of bison. The Henry Mountains Herd has documented the behavioral changes that occurred with the introduction of hunting as a population control method.

Specific Comments:

Page 4, Line 2: Restoration is an ambiguous term that needs further definition and comparison with reintroduction.

Page 4, Paragraph 3: What is the process for requesting that FWP evaluate potential opportunities? Is this a formal process or defined in ARM?

Page 5, Paragraph 1: "Well thought out" containment and management plan does not have criteria or indicate who has determined this is true. "Local community involvement" does not necessarily mean support or a role in management so much as indicate that there is an opportunity for public comment.

Page 5, Paragraph 2, Line 4: "contribute to the restoration of ecological processes" how is this determined, monitored, or quantified?

Page 6: Members of the Bison Discussion Group, Dean Rogge and Lesley Robinson, requested to participate in the drafting of this document but were not contacted. This contributes to the perception that local people are not part of the process.

Page 7, Paragraph 7: Please cite evidence as to where bison were utilizing western Montana. Were they introduced or did they migrate of their own accord?

Page 8, Paragraph 2: The use of "mercilessly" contextualizes the actions of the past in the context of a different moral paradigm than was present at that time.

Section 1.3: General sentiment regarding the programmatic EIS was that it led to less transparency and the need for less procedure in moving forward FWPs goal of putting more bison on the landscape.

Page 12, 2nd to last bullet: We support the goal to "Ensure that bison would not unreasonably affect existing land uses, such as timber harvest, energy development, or public grazing unless mutually agreed upon by affected parties." However, we see a lack of this understanding in the development of scenarios

Section 1.7: We would like to see these concerns more specifically addressed should any alternative other than Alternative #1 be selected.

Section 2.2 Paragraph 1: What parameters are necessary for an organization or paper to be cited? For example why is information from the International Union for Conservation of Nature, an NGO, included? What type of peer review needs to be conducted in order to be included?

Page 21, Paragraph 1: What was the extent of cattle gene introgression and can this be managed?

Page 21, Paragraph 4: What are these adaptive management adjustments? How is tolerance defined or identified? How much local input is incorporated into these decisions?

Section 2.3.1: How will this information be adapted or assessed at the smaller scale? Is the majority of this information scalable?

Pg 23: The grazing and non-grazing activities of bison are discussed with the conclusion made that bison and cattle are not ecologically functional equivalents. Research by McMillan et al. 2011 is cited as the basis of this conclusion. However, McMillan et al. 2011 did not compare areas grazed by cattle to areas grazed by bison. Furthermore, the design of McMillan and colleagues' study was such that wallows were excluded from bison activity for 3 years. It was only after bison wallowing had been excluded for at least a year that an increase in diversity and richness on the edge of wallows was documented. Another non-grazing activity called "horning" was described as a behavior that 'involves rubbing on a shrub or small tree….". Although no direct claims were made to its ecological benefits to prairies, it was included in the discussion that determined the differences between cattle and bison. As described, horning equates to destruction of woody vegetation. Cattle are expressly managed to reduce impacts to woody vegetation, particularly in riparian areas where most woody vegetation occurs on the Northern Great Plains. Enforced reductions in hot-season grazing periods, fencing, and herding have all been employed to keep cattle from causing damage to riparian woody vegetation. How will bison be managed to reduce harm to riparian plant communities?

Perhaps the best assessment of the ecologically functional equivalency of cattle and bison was made by researchers Allred, Fuhlendorf and Hamilton (2011); "It is not productive to look for differences or similarities between bison and cattle to justify certain management objectives or agenda. In the face of the vast variability and complexity in which these species are nested within, generalizations are limited and over inferences likely." The researchers further argued that future comparisons of bison and cattle should be limited to the specific abiotic and biotic environment in which these species occur and that many conservation objectives can be met with cattle.

Pg 66; "Monitoring and research projects could be designed to determine if these desired conditions are being met through the grazing and wallowing behaviors of bison which tend to create specific environments of greater plant diversity than surrounding areas. This increase in plant diversity is utilized by other animals and increases the diversity of wildlife within the region (Foresman, 2001; Picton, 2005, Gates et al. 2010)."
Response: An increase in plant diversity is not always a desired objective in rangeland management, depending on what species constitute that increase in diversity. A study conducted by Miller et al. 2014 demonstrated that the increase in diversity stemmed from an increase in "weedy" plants at the edges of wallows. Weedy plants were defined as; "….those species documented as tolerant of high disturbances, regardless of whether they were annuals, biennials, or perennials." Similarly, McMillan et al. 2011 found an increase in plant species richness and diversity associated with wallows, but concedes that these increases were mainly from annuals and forbs. With noxious weeds such as spotted knapweed and cheatgrass posing serious threats to rangeland and wildlife habitat, and climate change predicted to increase these weeds, it is generally advised to limit disturbance in order to limit weed establishment and proliferation. While production agriculture produces its own incentive to control weeds on rangeland and cropland, there is no economic incentive to control weeds on lands managed for recreational uses or wildlife habitat, and such control is often limited by budgetary priorities. Should any alternative aside from Alternative #1 be selected, long-term funding should be available for a weed management program.

Pg 62: "Current grazing allotments for domestic livestock should not need to be adjusted because of a bison restoration program unless mutually agreed upon by current allotment holders."
Response: It is important to note that all former sheep grazing allotments near the Henry Mountains bison herd have been changed to cattle grazing allotments, specifically to reduce the potential for disease transfer to bison, and several allotment holders have had to drastically cut their AUMs because of forage shortages. These have been voluntary, but to say that research demonstrates that bison grazing results in only a slight decrease in forage is incorrect. The decrease is slight, but only after the voluntary reduction of 3,000 AUMs by one allotment holder due to loss of forage to bison and a 55% reduction in winter grazing by another neighboring rancher because of bison utilization of forage. Additionally, it appears that both Ware et al. 2014 and Ranglack et al. 2015 only assessed the summer range of bison for vegetation and soil impacts. The winter range has not undergone a rangeland health assessment and winter range can suffer the greatest impacts to soil and vegetation

Pg 72: "Conditions of these agreements, (FWP incentives for wildlife habitat), have included, implementation of rest-rotation grazing systems or other practices that conserve native plant communities and ensure available forage for native ungulates and cover and food for other wildlife species."
Response: FWP promotes the use of rest-rotation grazing for wildlife habitat and recognizes the value of this management in retaining high quality habitat for ground nesting and song birds. Higher populations of some song birds have been observed in areas grazed by cattle as compared to areas grazed by bison (Sliwinski 2011). This is yet more evidence that conversion of cattle grazing to bison grazing will not result in net ecological benefits to the prairie landscape.

Pg 87: "Bison present on APR lands at this time are classified as bison." Should this be livestock?

Literature Cited:

Allred, B.W., S.D. Fuhlendorf, and R.G. Hamilton. 2011. The role of herbivores in Great Plains conservation: comparative ecology of bison and cattle. Ecosphere. 2:1-17.

McMillan, B.R., K.A. Pfeiffer, and D. W. Kaufman. 2011. Vegetation responses to an animal-generated disturbance (bison wallows) in tallgrass prairie. American Midland Naturalist. 165: 60-73.

Miller, K., J. Foster, K. Nielsen, and M. O'Loughlin. 2014. Potential impacts of bison wallows on a restored tallgrass prairie community. Proceedings of the North American Prairie Conference. 23:29-39.

Ranglack, D.H., S. Durham, and J. T. du Toit. 2015. Competition on the range: Science vs. perception in a bison-cattle conflict in the western USA. Journal of Applied Ecology. 52:467-474.

Sliwinski, M.S. 2011. Changes in grassland songbird abundance and diversity in response to grazing by bison and cattle in the northern mixed-grass prairie. M.S. Thesis, Winnipeg, Manitoba, University of Manitoba.

Ware, Ian M, P. Terletzky, P. A. Adler, 2014. Conflicting management objectives on the Colorado Plateau: understanding the effects of bison and cattle grazing on plant community composition. Journal for Nature Conservation. 22:293-301.

Citation Comment
Citation for McMillan et al. 2011, should be:
McMillan, B.R., K.A. Pfeiffer, and D. W. Kaufman. 2011. Vegetation responses to an animal-generated disturbance (bison wallows) in tallgrass prairie. American Midland Naturalist 165: 60-73.