



Flathead Audubon Society

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Bernardo Garza
U.S. Fish and Wildlife Service,
Branch of Planning and Policy, 134 Union Boulevard
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Lakewood, Colorado 80228
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Dear Mr. Garza,

The Flathead Audubon Society is a local chapter with deep concern for our environment. Our members are long-time and regular users of the National Bison Range. We submit the following comments for the Draft Comprehensive Conservation Plan and EIS for the National Bison Range.

The Plan (Draft Comprehensive Conservation Plan and Environmental Impact Statement National Bison Range) addresses three alternatives. Flathead Audubon appreciates the refinement of management at the Bison Range and the acknowledgement to manage for ecological conditions including Migratory Birds and species of concern. The Bison Range is to be managed to provide a representative herd of bison, or buffalo, under reasonably natural conditions, to help ensure the preservation of the species for continued public benefit and enjoyment and reserved the NBR "as a refuge and breeding ground for birds."

The Plan identifies and mandates several things common to all Alternatives. In particular interest to Flathead Valley Audubon are the following:

- *Wildlife conservation, including habitat conservation, is the Service's first priority for managing national wildlife refuges. Public uses, specifically wildlife-dependent recreational uses, are allowed and encouraged as long as they are appropriate and compatible with the establishment purposes of each refuge.*
- *"Our mission is working with others to conserve, protect, and enhance fish, wildlife, and plants and their habitats for the continuing benefit of the American people."*
- *The Refuge System will continue to conserve and enhance the quality and diversity of fish and wildlife habitat within refuge.*

The Plan states the "*refuge also supports over 200 native bird species. In addition to the federally threatened grizzly bear and bull trout, there are forty-three Montana species of concern that occur on the refuge*", but offers little of any specific

management objectives, constraints, or actions that would maintain or improve these species, or enhance the quality and diversity of fish and wildlife habitat.

The proposed action lacks much specificity, making it difficult for thorough comparison of alternatives or evaluation of impacts of each. We recommend that guiding principles be implemented under each (all) alternatives that would establish management thresholds for all the resources. These could include restricting activities during the breeding season, maintaining a certain percentage of the habitat in untreated (ie non-sprayed, burned, grazed) condition; ensuring that visitors do not disturb the bison or wildlife in a way that would cause displacement, abandonment or undue stress.

Clarify the ambiguous terminology regarding undesirable plants. The plan appears to mix the terms "noxious" and "invasive" and "weeds". The indistinct definitions can lead to counter-productive management. Clarity in the terminology will help to more effectively meet the goals and objectives of the plan. We recommend you use the nationally consistent terms and definitions defined by NRCS (Natural Resources Conservation Service, USDA).

(https://www.nrcs.usda.gov/wps/portal/nrcs/detail/ct/technical/ecoscience/invasive/?cid=nrcs142p2_011124)

Noxious plants have a legal designation usually related to the impacts of those plants on agricultural interests. A list of the plants on that list can be found at this website. (<https://plants.sc.egov.usda.gov/java/noxiousDriver>)

Utilize the expertise of the NRCS to aid your establishment and management of desired conditions of rangelands. Their classifications are based on the site potential, soil type, climate, and predictable plant succession of the ecological plant community. A long-grazed area may have deviated significantly from the "natural" state. Knowing what the healthy community should have present can help define how to manage the area for the desired condition.

The Plan mentions several generic methods to manage undesirable species, including herbicides, prescribed fire and "removal". The Plan lacks essential information regarding treatments:

- location, type of herbicide, timing and extent of application, application method, target species
- location, type, extent, season, duration, pattern, season, control mechanisms and intensity of fire
- location, extent, trees per acre, removal methodology, access, season of treatment, how removed trees will be handled (left in place; hauled out for firewood; used for lumber, chipped)

These details would refine impacts to the resources of concern.

Just for one instance, the discussion of herbicides is quite vague. Glyphosate becomes inert when it contacts soil (making one of your statements in the EIS incorrect), but dicamba has well-documented airborne non-target impacts and has some fairly long residual effects. A generic USFWS document guiding weed management is not adequate to ensure that significant impacts might not occur at specific locations under some circumstances. Other management actions can have widely different impacts, depending on the details, and should be defined more thoroughly. If specifics can't be identified in this level of analysis, we recommend that some minimum conservation standards be incorporated across all alternatives to ensure significant adverse impacts wouldn't occur, and documented in the Plan and EIS.

There are similar concerns regarding fire. Cheatgrass and other fire responsive plant in the area are mentioned. Fire is a great disturbance factor when an ecosystem is functional, and if the fire occurs in late summer/fall when grasses and weeds are cured out. However, most prescribed fires occur in spring when escapement and smoke risks are less. Spring burns impact nesting birds and young animals, and plant response is often quite different...and stimulation of annual grasses is a real risk. It's not an easy tool. In eastern Oregon, once cheatgrass (or other annual grasses) become prominent, fire can make things worse. The annual grasses are stimulated, some of the perennial forbs and grasses are killed (because they are burned during a vulnerable season), and even worse plants can become established.

The Plan focuses on the management of bison in "*reasonably natural conditions*" habitat. The bison on the refuge are managed more like livestock than wildlife. Bison once had huge habitats that ranged over thousands of acres, although they were nearly extirpated in the wild before good life history information on free-ranging bison could be thoroughly researched. According to a plains bison document from Canada, ([/https://www.sararegistry.gc.ca/virtual_sara/files_cosewic/sr_plains_bison_e.pdf](https://www.sararegistry.gc.ca/virtual_sara/files_cosewic/sr_plains_bison_e.pdf)), Van Vuren (1983) estimated typical individual female bison home ranges of 32-82 km², while Lott and Minta (1983) estimated a range size of 27-71 km². Home range sizes have not been examined for plains bison in wild herds. It is unlikely that bison on the Bison Range will ever have enough unfenced habitat to live under normal movement patterns. Free ranging bison, controlled by food quality and distribution, weather, predators and disease would typically move across vast areas of their home range and not camp out in areas to cause it to be over-utilized. In a captive semi-wild situation such as the Bison Range, over-use of their habitat has probably occurred, and changes to the ecological conditions of the grasslands have probably resulted.

It would be clearer to the public to explain that the bison on the Bison Range are representative of the herds that used to occur prior to the development of agriculture and wide-spread extirpation of bison, but are not currently functioning as wild animals. We realize management of bison as wildlife may be beyond the scope of the Refuge, but clear explanation of the current status of bison as a managed species should be provided for the public to understand limitations to recreating a "natural" system.

We support the concepts of Alternative C, the Proposed Action and applaud the goal to "*enhance ecological communities in light of environmental changes, build in resiliency, promote genetic diversity and build sustainability in management capacity*". We offer some recommendations to better refine actions to meet these lofty goals.

E-bird is mentioned as an action under Alternative C. E-bird can be an excellent method to survey the presence of birds, but offers no management guidance or habitat recommendations. In addition to basic survey data, the identification of which species are year-long, summer, or migratory species would be prudent. Once these are identified, the mapping and protection/habitat improvement of the important components of these species can be highly beneficial.

For instance, if one of the nesting species requires tall grass, certain areas of the Bison Range could be kept out of grazing areas until after the nesting season. Similarly, if some species are known to migrate at particular times of year, the feeding resting habitat used by those species for that short amount of time could be managed so those resources are available. Using that information could also provide opportunities for the public to view migration from areas where their presence would not disturb the migration, but allow visitor enjoyment. Alternative B offers some recommendations for small groups of people to view an area. The option of guided field trips or viewing blinds in key locations could enhance visitor enjoyment without disturbing the resource.

Standing and down dead wood is extremely valuable to the biodiversity of the ecosystem. Many birds and insects require this habitat component. If trees are to be removed from the canopy to reduce their encroachment on grassland habitat, leave many of them on site to maintain a good size/age/species/decay distribution of dead wood across the management area. Add girdling to the management actions that would reduce tree competition while simultaneously creating dead wood habitat for birds, mammals and insects.

Alternative B incorporates some actions that seem to conflict with the overall mandate of the Bison Range. In particular, Alternative B identifies a public use "goal" of more than 184,000 visitors per annum (estimated), but fails to provide good analysis on how that current use is compatible with the other mandates of the agency and the Bison Range. The Plan suggests this is the highest use estimated for the Bison Range, and sets a goal of greater than that number of visitors each year, with no maximum limit. It further identifies conversion of habitat to infrastructure and development (roads, buildings, parking, restrooms etc), without addressing how that loss of habitat would affect the ecological condition, movement patterns, bird habitat and "natural" condition of the Bison Range. It provides for opening of "closed areas" in some circumstances to meet the desires of the public. It suggests the increase of fishing access with some impacts to riparian habitat. The "success" of these increases in infrastructure would be measured by the "satisfaction survey" of users. Photographers, wildlife viewers, bird watchers, plant enthusiasts and fishing publics have often insatiable and contradictory desires for the use of public lands. Data from many other places suggest that public

use be encouraged, but managed in a way to be compatible and non-destructive to the resources in the area. Flathead Audubon supports public use and education, and wise stewardship of resources, including infrastructure, but considers Alternative B counter-productive to the mandates of the Bison Range.

Literature cited

Van Vuren, D. 1983. Group dynamics and summer home range of bison in southern Utah. Journal of Mammalogy. 64:329-332.

Lott, D.F., and S.C. Minta. 1983. Random individual association and social group instability in American bison (Bison bison). Zeitschrifte fur Tierpsychologie 61:153-172.

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