

MCCONE CONSERVATION DISTRICT

P.O. Box 276, Circle, MT 59215

Dear Montana Fish, Wildlife & Parks,

McCone Conservation District is a board of seven elected officials and unit of local government mandated by state law to provide for local control of natural resource management programs and activities. (§ 76-15-102 MCA) McCone County comprises of 1,717,120 acres including three watersheds: the Red Water River, Prairie Elk-Wolf and Fort Peck Reservoir. Approximately 87,573 acres or 5.1 percent lies in the 1.1 million land and water boundary acres of the Charles M Russell National Wildlife Refuge (Koontz, Sexton, Ishizaki and Ritten, 2012).

We are writing to ask that you support the “No Action” alternative being analyzed in the Draft Environmental Impact Statement: Bison Conservation and Management in Montana. Ranchers, farmers, bison producers, tribal business entities, conservation districts, county commissioners and the Montana Association of Conservation Districts have all voiced their concerns of ecologic, economic and environmental consequences of bison re-introduction in Montana. We stand with the multitude of testimonies against this action.

McCone County citizens passed **An Ordinance for the Protection of Soil and Water from Wild, Free Roaming or Domestic Bison Grazing in McCone Conservation District** in the 2012 General Election. Of the 1018 voters, 640 or 63% voted yes, 318 or 31% voted no and 60 or 6% abstained from voting. It reads: To enact a soil conservation and erosion prevention program for the conservation and protection of land, water, and other resources of the McCone Conservation District from the grazing of wild, free roaming and domesticated bison; encourage the use of land in accordance with its capabilities and treat it according to its needs; prevent the degradation of rangelands, cultivated lands, waterways, drainages, reservoirs and lakes; protect the tax base; protect and promote the health, safety and general welfare of the people; and ensure that soil resources are preserved for the production of food and fiber for the present and future generations of this district. This document is not about wildlife versus livestock designation, but of the conservation of natural resources. § 76-15-102 MCA gives Conservation Districts this authority.

During the public scoping progress, one of the potential locations for bison restoration discussed was the Charles M. Russell National Wildlife Refuge. The six-county area surrounding the Refuge are Fergus, Garfield, McCone, Petroleum, Phillips and Valley. The population is 25,287 residents (2008 Census) or approximately 2.6 percent of Montana's overall population. In 2007, gross revenue for agricultural operations of this area totaled \$364.7 million--\$164 million from livestock, \$133 million from crops and \$67.7 million from other sources (Bureau of Economic Analysis, 2008). Farming and ranching are important cultural forces and the largest employer in each of those counties (Koontz et al., 2012). Agricultural interests could be negatively impacted by bison in areas near private land but the magnitude of those impacts is difficult to determine without a specific restoration site (EIS Executive Summary). U.S. Fish and Wildlife Service's (FWS) ability to influence local economic activity and desired economic conditions will be related to its land-use decisions and associated land uses (Koontz et al., 2012).

In the 2007 Agricultural Census, the six-county area combined had 52,996 sheep. Sheep associated disease Malignant Catarrhal Fever (MCF) in bison is highly lethal, with almost 100% mortality within an infected herd (Schultheiss et al., 2001). Bison most commonly become infected through direct contact with domestic sheep, though there were cases where MCF was reported in bison herds that were located 3 miles from a lamb feedlot (Schultheiss et al., 2001; Gates et al, 2010; Draft Bison EIS Page 39). It is generally recommended that domestic sheep herds not be grazed within two miles of bison to protect the population from MCF and Johne's disease (paratuberculosis).

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In the Bison Restoration Project Guidelines 3.3.1, 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 holder(s). Grazing allotment plans could be changed based on environmental conditions or other direction/desires from the land management agency with jurisdiction (Draft Bison EIS Page 62). Yet in the Henry Mountains, there are currently no active sheep allotments in the area as the past active allotments have been changed to cattle allotments in order to reduce the chance that sheep could transmit MCF to bison (UDWR, 2007b, Draft Bison EIS Page 79)

Also in the 2007 Agricultural Census, the six-county area held 401,377 cow/calf pairs. Van Vuren (1979) reported that both bison and cattle on the Henry Mountains were primarily grazers, but that bison diet consisted of 5% browse, compared to no use by cattle. Cattle, on the other hand, were more likely to use forbs than bison. While dietary overlap with cattle is significant, bison may be more likely to use shrubby vegetation during winter periods (Harper et al., 2000). In a study comparing the diet compositions of bison and cattle on short-grass plains, Peden et al. (1974) found that "bison appear to have a greater digestive power than cattle when consuming low protein, poor quality forage . . ." (pp. 497) Plumb and Dodd (1993), however, found in a comparison of bison and cattle grazing on mixed prairie that their results "do not completely support the hypothesis that bison have the ability to digest lower quality forages better than cattle" (pp.63). Bison and cattle were managed within enclosed pastures in both studies.

In spite of these beneficial behavior differences in free roaming bison, their population distribution will largely determine the degree of direct forage competition with livestock (Van Vuren 1979). Fuhlendorf et al., (2010) states "the differences and similarities of bison and cattle on complex landscapes have not been adequately studied, and there are few studies that directly compare bison and cattle." We agree.

This area covers 16 percent of Montana's land with only 2.6 percent of her population. That's about 1.1 person per square mile. It's wide open country where people are friendly, hardy and resourceful. Bison in the backyard alters the landscape that 100 + years of agriculture and ranching have changed—for better or for worse. It's a romantic idea of thousands of hooves thundering across the prairie, but in reality that creates havoc with fences, livestock and people in our world. If cattle or sheep operations are replaced by bison, the losses to the local economy will be enormous.

We respectfully ask that you choose the "No Action" alternative. Thank you for your time and consideration.

Sincerely,

Steve Wanderaas, Chairman
McCone Conservation District
P.O. Box 276
Circle, MT 59215

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