



Society for Range Management

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www.rangelands.org #respectontherange

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APR Scoping Comments
BLM Malta Field Office
47285 Highway 2, Malta, MT 59538

To whom it may concern;

The Society for Range Management (SRM) submits the following scoping comments regarding the bison grazing proposal to be considered for the Bureau of Land Management Beauchamp Creek, Burnt Lodge Unit, CK Creek Unit, Dry Fork Unit, PN Unit, Sun Prairie Unit, Sun Prairie North Unit, Timber creek Unit, Two Crow Unit and White Rock livestock grazing allotments in north central Montana.

SRM is a professional organization that provides leadership for the sound stewardship of rangelands and has done so for nearly 70 years. Our members represent private and public land managers, academics, agricultural and natural resource businesses, and representatives of various wildlife and natural resource conservation groups with the goal of sustained health and productivity of our world's rangelands.

SRM is not concerned with the specific species grazing the rangelands, so long as management and monitoring are actively occurring to ensure a sustainable balance between grazers and other ecosystem processes is achieved. It has been our experience in Australia, Canada, South Africa, Europe and the Americas that natural population regulation of any species can lead to deterioration of rangelands when populations of confined ungulates exceed rangeland carrying capacity. Therefore, we emphasize the need for an Environmental Assessment section describing how monitoring outcomes will be linked to herd size and population management.

SRM members focus their work on active management and monitoring; the proposed changes to year-long grazing necessitate detailed examination regarding grazing distribution. A proven tenet of range management within the northern mixed grass prairie and sagebrush steppe biomes has been the construction of fences and water developments to limit overgrazing of preferred landscapes and to distribute grazing across a landscape. Based on the many positive responses to this management approach this Environmental Assessment must address how population levels under practices that include cross fencing to distribute grazing can be maintained when the fences are removed. If the management tools (cross fences) that were employed to improve grazing distribution and increase carry capacity are removed then stocking rates cannot be maintained at previous levels without risking significant overgrazing as a result of preferential grazing of preferred areas.

Flexible management can be successful when based on scientific understanding of the feedback between grazing and the soil-vegetation complex, this knowledge enables producers and land managers such as the BLM to adapt stocking rates and grazing periods to adverse weather conditions, wildfire or other circumstances. However, flexible management can lead to unfavorable results without planned monitoring of ecological health and grazing distribution. We strongly recommend a section describing responsible parties, monitoring methods, summarization and systematic reporting to the Bureau of Land Management and Montana Department of Natural Resources, School Trust Lands. The "Preliminary Issues Identified for Consideration" (BLM North Central Montana District Office) do not suggest sufficient detail to

address the information needs for flexible management. Bypassing thorough description of the monitoring-management feedback loop in the Environmental Assessment can produce ecological conditions that run counter to the long-established BLM grazing management program and are likely to lead to the degradation of the region's rangeland ecosystem.

The Society for Range Management strongly encourages you to consider these points when evaluating the Environmental Assessment of the bison grazing management proposal for the above-mentioned grazing allotments. Please do not hesitate to contact our office at (303) 986-3309 for more information or to continue the dialogue on this issue.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Barry Irving". The signature is stylized with a large, looped initial "B" and a trailing flourish.

Dr. Barry Irving
President, Society for Range Management