

National Bison Range Complex Comprehensive Conservation Plans

Scoping Report

Introduction

In 2017, Region 6 of the U.S. Fish and Wildlife Service (Service) published three Notices of Intent (NOI) in the Federal Register (FR) announcing the development of comprehensive conservation plans (CCP) for the units of the National Bison Range Complex (Complex) in Montana.

The first NOI was published in the FR on January 18, 2017, and announced the Service's intent to develop a CCP for the National Bison Range. This NOI informed the public of three management alternatives being considered by the Service: A) Current Management—continuing current management and serving as a baseline for comparing other the other alternatives; B) Preferred Management Option—recommending a Congressional transfer of the NBR to the Confederated Salish and Kootenai Tribes (CSKT) of the Flathead Reservation; and, C) Executing and carrying out a draft negotiated Annual Funding Agreement with the CSKT per the Tribal Self Governance Act.

The second NOI was published in the FR on May 18, 2017. This NOI announced the Service's revision of the original January 2017 FR notice. The NOI provided additional opportunities for public input and stated the Service's intent to continue the development of a CCP for the NBR while announcing a change in policy direction regarding the legislative transfer of the NBR.

The third NOI was published in the FR on May 18, 2017. This NOI announced the Service's intent to gather information to prepare a CCP for Lost Trail, Ninepipe, and Pablo National Wildlife Refuges, and the Northwest Montana Wetland Management Districts in Lake and Sounders Counties, Montana.

To date, the Service has received hundreds of comments in response to the three NOIs and to the information provided during the four public scoping meetings held throughout the planning area. For ease of use, this report is divided in three parts, according to the three NOIs mentioned, and provides a summary of the comments, in table format, organized according to distinct categories.

Because the January 2017 and May 2017 NOIs announced different actions by the Service the nature of the comments received was different as well. Therefore, this report has a slight difference in how it provides the reader the summary of the comments received.

Summary of Comments Related to the First Notice of Intent (January 18, 2017)

WILDLIFE MANAGEMENT

Summary: Encourage an ecologically intact ecosystem based on healthy rangeland as a foundation for supporting herds of healthy bison and other species such as elk, deer, big horn sheep and other big game and wide roaming species and would include such issues as: herd size targets/culling plans; general health monitoring and management; genetics; as well as other general management issues. Address predator management (including, among other species, black bear, grizzly bear, gray wolf, coyote, mountain lion, golden eagle, and bald eagle) and their role in controlling herd size and risk of disease and its spread, especially CWD. The CCP and EIS needs to address the potential of the NBR to serve as grizzly bear habitat, including transient habitat and connectivity to other occupied and unoccupied areas.

Key Comments:

Although the NBR is managed largely for the bison herd, the CCP should also consider the health of the rangeland for elk, deer, big horn sheep and other big game and wide roaming species.

The CCP and EIS needs to address the potential of the NBR to serve as grizzly bear habitat, including transient habitat and connectivity to other occupied and unoccupied areas consistent with the NCDE Conservation Strategy. This may include the NBR as well as coordinating with neighboring residents.

Encourage an ecologically intact ecosystem based on healthy rangeland as a foundation for supporting herds of healthy bison and other species at sustainable population levels and envision the presence and tolerance of predators and carnivores as an important element in controlling herd size and the risk of disease and its spread, especially CWD.

The Tribes would also expect that predator management (including, among other species, black bear, grizzly bear, gray wolf, coyote, mountain lion, golden eagle, and bald eagle) would be addressed by the CCP.

BISON MANAGEMENT

Summary: The CCP must consider how the genetic integrity of the bison herd will be maintained for the long term. The current USFWS genetic and health monitoring program should be continued, in part or whole, as part of the management plan for NBR. This should be part of a greater landscape conservation effort. Encourage the CCP to consider opportunities for bison to access areas that may be available adjacent to the NBR.

Key Comments:

Encourage the CCP to consider opportunities for bison to access areas that may be available adjacent to the NBR. We recommend that a quality and genetically reputable herd be maintained by CSKT at NBR. The CCP must consider how the genetic integrity of this herd will be maintained for the long term. The current USFWS genetic and health monitoring program should be continued, in part or whole, as part of the management plan for NBR. How this program is to be cooperatively administered and implemented by CSKT and DOI should be explained in the planning process.

Given the National Bison Range's purpose for establishment of preserving the American bison, it seems appropriate to consider the refuge's role in biological diversity and ecosystem management where purity of genetic strains of bison are preserved for restoration of herds at various locations of the Great Plains. This would be part of a greater landscape conservation effort.

The Tribes expect that bison and big game species management would be prominently addressed in the CCP. This management, including for bighorn sheep, elk and deer, would include such issues as: herd size targets/culling plans; general health monitoring and management; genetics; as well as other general management issues. Each large mammal population on the NBR should be addressed in reasonable detail, providing a documented historical outline for each species on the NBR. This should include population origin, relevant objectives, past methods used to maintain the population within objective targets, methods for dealing with disease outbreaks, and other life-history data of importance. Summaries should be included for the formal and informal research and wildlife management studies that have been completed, and all studies currently underway. These facts should thus form the basis for discussion of alternative management strategies later in the CCP.

The CCP should provide a detailed history of the origins and original purposes for establishing the NBR along with facts on the founding animals and respective bloodlines of those founders. The NBR's founding bison have a complex lineage and documented interactions with other major lineages. Those factors should be thoroughly discussed. Past inadvertent cattle introgression, potential for future genetic drift, strengths and deficiencies of current genetic testing techniques and related topics should be presented. Disease possibilities and protocols for periodic testing along with methodologies for handling sudden outbreaks should be elaborated.

The founding of a bison metapopulation in 2009 along with a basic operating protocol for such management and its primary objectives is a very important topic for the CCP. The central role of NBR bison in that metapopulation model is an essential feature of all Fish and Wildlife Service bison herds. It is, therefore, highly important that a thorough discussion be included in the background information of the CCP.

HABITAT MANAGEMENT

Summary: Range condition, weed management, pine encroachment, forest habitat management, fire management, riparian management, wetland management, and water management issues are all components of habitat management that should be addressed in the CCP. A solid discussion of internal fencing/pastures within NBR should be included. Diverse habitats should be inventoried, mapped and maintained and the NBR should be managed to increase underrepresented habitat types typical of historic vegetation.

Key Comments:

Diverse habitats should be inventoried, mapped and maintained and the NBR should be managed to increase underrepresented habitat types typical of historic vegetation.

Encourage addressing the role of fire and other disturbances in maintaining the native vegetation
Range condition, weed management, pine encroachment, forest habitat management, fire management, riparian management, wetland management, and water management issues are all components of habitat management that should be addressed in the CCP.

The internal fencing/pastures within NBR constitute a vital component permitting that more intensive management. A solid discussion related to these subjects is called for in the CCP.

INVASIVE SPECIES

Summary: Invasive species issues (including both terrestrial and aquatic) should be identified and prioritized and there should be an early detection, rapid response plan as well as a plan to control existing infestations and reduce the occurrence and spread.

Key Comments:

Invasive species issues should be identified and prioritized and there should be an early detection, rapid response plan as well as a plan to control existing infestations and reduce the occurrence and spread.

The Tribes believe that the CCP should address contingencies for aquatic invasive species, whose profile has recently been elevated in Montana.

Additionally, invasive species are a recognized problem on the NBR. For the refuge to maintain and protect the vital native grasslands, particularly key species of fescue and other native grasses along with its other vital components, it must design and conduct a carefully planned, assiduously implemented “integrated pest management program” annually. Such a program is labor intensive and requires involved technicians to have formal training, proper equipment, and important knowledge of the target species and any potential or listed threatened or endangered native species that could be affected.

CLIMATE CHANGE

Summary: A major complicating factor that must be thoroughly addressed in the CCP is the expected features and likely impacts to be expected from the effects of Climate Change on habitat, species (fauna and flora), water, forage and wild fire impacts. The Tribes would ask the Service to take into consideration the Tribes' Climate Change Strategic Plan, which was adopted in September 2013 and is available at www.csktribes.org/CSKTClimatPlan.pdf

Key Comments:

In order to effectively look forward as a planning document, the CCP should address projected, likely, or potential impacts of climate change on habitat, species (fauna and flora), water, forage and wild fire impacts. The Tribes would ask the Service to take into consideration the Tribes' Climate Change Strategic Plan, which was adopted in September 2013 and is available at [www.csktribes.org/CSKTClimatPlan.pdf].

Climate change could affect habitat, species, the amount and quality of water, and the availability of forage. Resulting high intensity wild fire can threaten forest ecosystems and impact soil and water quality. Species migration into the area can increase competition for grasses and forage. Please address and consider impacts of climate change on rangeland and other ecosystems and wildlife habitat.

A major complicating factor that must be thoroughly addressed in the CCP is the expected features and likely impacts to be expected from the effects of Climate Change. It is likely that some subtle, but important changes have already begun to affect the NBR plants and animals. The Coordinating Team should consist of expert wildlife, plant, disease, genetic, and ecosystem specialists from agencies such as the State Fish and Game Department, State agricultural agency, USGS Biological Division, Natural Resources Conservation Service, USFS, County officials, the University of Montana, and others in order to have the expertise necessary for identifying and analyzing available data along with interpreting models of expected climate changes in Western Montana and the Mission Valley in particular.

MONITORING AND RESEARCH

Summary: We encourage the CCP to identify opportunities for research. These could include ecological conditions, diversity of plants and animals on the bison range, role of carnivore in population and disease control, role of wildfire and other disturbance regimes in grassland health and maintenance and diversity of habitat, presence and control of weeds and other invasive species, among other things. The CCP should include a plan for research and partnering with institutions and agencies both on and off the reservation. The Tribes further recommend that the CCP address surveying and monitoring of nongame birds, as well as amphibians and reptiles.

Key Comments:

We expect the CCP to identify monitoring elements to evaluate rangeland conditions and carrying capacity, as well as the health of the bison herd and other species including elk, deer, and bighorn sheep. Again, we are concerned about CWD and encourage a proactive plan to address this disease.

We encourage the CCP to identify opportunities for research. These could include ecological conditions, diversity of plants and animals on the bison range, role of carnivore in population and disease control, role of wildfire and other disturbance regimes in grassland health and maintenance and diversity of habitat, presence and control of weeds and other invasive species, among other things. The CCP should include a plan for research and partnering with institutions and agencies both on and off the reservation.

The Tribes further recommend that the CCP address surveying and monitoring of nongame birds, as well as amphibians and reptiles.

VISITOR SERVICES

Summary: The CCP provides an opportunity to examine and plan for such public use/access considerations as: visitation projections; desired visitor experiences; fishing access; wildlife watching and photography opportunities; recreation site (picnic areas) availability and management; fee structures; and the possibility of tours.

Key Comments:

In addition to maintenance and replacement of facilities including the visitor center, roads, entrances and the installation and content of signage, visitor services should include maintaining access for the public. Opportunities for education are also important visitor services. Topics could range from cultural to factors that comprise a healthy and functioning ecosystem.

The CCP provides an opportunity to examine and plan for such public use/access considerations as: visitation projections; desired visitor experiences; fishing access; wildlife watching and photography opportunities; recreation site (picnic areas) availability and management; fee structures; and the possibility of tours.

The Tribes anticipate that the CCP would address the following issues related to visitor services:

- current state of, and future outlook for, the visitor center, including need and potential for replacement;
- access considerations, including potential for an additional, or alternate, entrance such as at Ravalli Hill;
- interpretive displays, materials and sale items;
- information availability and standards/criteria for inclusion of information/materials;
- education, public awareness, programs and presentations;
- receipt collection and accountability; and
- staffing and volunteers

TRIBAL COOPERATION/CULTURAL AND HISTORIC RESOURCES

Summary: We also encourage consideration of the benefits of the Tribes' traditional ecological and cultural knowledge and their special historical, geographic, and cultural relationships with bison and the Range insofar as those deep connections can support the management of natural and cultural resources and the provision of unique public educational and interpretive services at the NBR. Federal laws mandate that the FWS must recognize its responsibility to identify, protect, consult with the tribes about, and otherwise respect such important cultural features, artifacts, etc. This topic should be given thorough thought and discussion.

Key Comments:

The inventory, preservation, and management of cultural and historical resources are high priorities for the Tribes and need to be addressed at some level in the CCP. We have cooperated with the Service in this area in the past, and we look forward to continued collaboration through our Tribal Preservation Department. The Tribes request that the Service consult with us regarding these issues, consistent with Executive Order No. 13175 ("Consultation and Coordination with Indian Tribal Governments"), the Department of the Interior Policy on Consultation with Indian Tribes, and the National Historic Preservation Act (54 U.S.C. § 300101 et seq.).

We also think that the CCP should address tribal cultural resources and opportunities for tribal collaboration.

We also encourage consideration of the benefits of the Tribes' traditional ecological and cultural knowledge and their special historical, geographic, and cultural relationships with bison and the Range insofar as those deep connections can support the management of natural and cultural resources and the provision of unique public educational and interpretive services at the NBR. We encourage the USF&WS to consider in the development of the conservation plan and environmental review process the various ways that tribal management can enhance and enrich the visitor experience.

The CSKT clearly have unique cultural and historical connections to the land and bison within the NBR. The proposed CCP and EIS must address how to strengthen this relationship between CSKT and NBR.

We recognize that the bison or buffalo was THE key animal in the life and livelihood of native people of the Plains and Plateau of North America. Even today, the iconic bison holds immense cultural and spiritual significance for these tribes. The CCP/EIS must take these values into account to design an appropriate future management of the National Bison Range.

It is to be expected that the area contains cultural materials and areas important to the tribes and its members. Federal laws mandate that the FWS must recognize its responsibility to identify, protect, consult with the tribes about, and otherwise respect such important cultural features, artifacts, etc. This topic should be given thorough thought and discussion. The Tribes have previously completed a cultural survey and report under contract to the FWS. The CCP process should provide an appropriate opportunity to analyze that report and decide if additional cultural survey work should be done in the future, its nature, the cooperating parties, and related factors that will lead to properly complying with the law, and the desires of the Tribes and members.

ECONOMICS/REFUGE OPERATIONS/STAFFING

Summary: We recommend a clear and concise business plan that illustrates the associated operational costs, revenue streams, and capital investments necessary to sustain long-term management of the NBR. Against the backdrop of budget projections and the "Realignment Strategy Staffing Framework" and its associated protocols, the CCP should address the existing vacant positions, as well as expected, desired and potential positions looking forward. The CCP should address the Service's plans, expectations, budget and cost outlooks for fire control, as well as controlled burns and other fire-related management issues.

Key Comments:

We recommend a clear and concise business plan that illustrates the associated operational costs, revenue streams, and capital investments necessary to sustain long-term management of the NBR.

Please fund the employment positions for the NBR as it merits for such a successful and shining example of the FWS. If the NBR is at all failing it is because of its management and poor funding on a national level, not from the efforts and devotion of the current NBR employees or management.

It would be helpful for the CCP to address facilities maintenance expectations, needs, budgets and costs for such facilities as the visitor center, residences, barns and other buildings, roundup facilities, picnic area toilets and structures, fences (exterior and interior), and trails.

Given the Service's Region 6 "Realignment Strategy Staffing Framework", and in light of that document's reference to a prioritization protocol for filling vacancies, the CCP should address the Service's expectations or outlook for enforcement responsibilities and jurisdictional impacts, as well as any cross-deputization expectations, needs or opportunities.

Again, against the backdrop of budget projections and the above-referenced "Realignment Strategy Staffing Framework" and its associated protocols, the CCP should address the existing vacant positions, as well as expected, desired and potential positions looking forward. Staffing, and associated volunteer needs, at the National Bison Range, has been the subject of several articles in local/regional newspapers over recent months, so there is likely considerable public interest in understanding the Service's long-term outlook for Bison Range staffing.

FWS, CSKT and the Bureau of Indian Affairs have historically entered into Annual Fire Management Operating Plan agreements addressing fire control at the National Bison Range. The CCP should address the Service's plans, expectations, budget and cost outlooks for fire control, as well as controlled burns and other fire-related management issues.

OTHER CONSIDERATIONS FOR THE CCP/EIS

Include a substantive section on the history of the CSKT, the NBR, the bison herd and the cultural practices, and traditional values.

The Service must take extra precautions to remain transparent and open to all stakeholders and the public at large.

MISCELLANEOUS OTHER COMMENTS RECEIVED

Transferring the lands, bison and resources of the NBR back into a trust for the CSKT, could reduce the federal bureaucracy and relieve the federal burden and free up funding for other purposes. The economic impacts of the various alternatives, including the potential savings due to transfer of the NBR to the CSKT should be evaluated.

The Service should analyze all of the impacts of transferring the Range to non-federal management

The January NOI is not in compliance with Service planning policy and/or NEPA.

Several comments about the precedent setting nature (both for and against) of the proposed transfer to the Tribes.

Since the NBR staff has been depleted in recent years, it is doubtful that current staff with actual knowledge of conditions at the NBR who should produce a CCP can complete this task without additional staffing. Per Refuge Planning policy, the planning team should include the Refuge manager and key staff members, as well as experts from regional and field offices. 602 FW 3, Sec. 3.4.C(I)(a). This team should engage in pre-planning, gathering of information and data, scoping, consideration of public input, analyzing alternative management options for the NBR as a unit of the NWRS, and all of the other components of the Service's comprehensive planning policy.

Many citizens of western Montana have been harassed, intimidated and even threatened regarding their opinions related to the future of the NBR and the NBRC. FWS has facilitated this in the past by releasing commentor's personal information. FWS should not provide personal information regarding any citizen willing to provide their suggestions and/or opinions in this matter.

Multiple comments about the history of payment to the Tribes for the land and/or the bison herd.

Summary of Comments Related to the Second Notice of Intent (May 18, 2017)

Qualities and Opportunities	
Wildlife	Refuge provides a 'snap shot' of Montana's wildlife
	Refuge manages plains bison
	Opportunity to revisit wildlife management strategies
	The CCP provides a great opportunity to direct development step-down plans for wildlife management
	CCP can assist FWS in better addressing sharp-tailed grouse reintroduction to NBR
	Develop a new bison management plan based on the Service's nationwide bison meta-population goals
	Time to critically look at and update the fenced animal management plan
	Opportunity to look again at the refuge's coyote control goals and plan (to help antelope recruitment)
	Time to address the need for existing management plans: antelopes, mountain goats, non-trust resources
	I like that you hold and manage bison within the Flathead Indian Reservation
	Since NBR bison herd is founding herd, its conservation and genetics should be paramount in the CCP
	NBR is considered by DOI as an essential part of its commitment to final recovery of the plains bison
	NBR provides habitat for 3 MT Species of Concern, and within range of 3 bat & 22 bird Species of Concern
	CCP is opportunity for FWS to document & address both resident and transient species that use the refuge

Qualities and Opportunities	
Habitat	The refuge is the most invasive plant-free land in Lake County
	Intact maintained ecosystems
	Coordination with surrounding lands for management
	Develop new habitat management plan taking into account the Service nationwide bison population goals
	Maybe a small users fee to drive through NBR would help pay for weed control in the refuge
	NBR has one of the largest remaining remnants of intermountain prairie in the nation – preserve it!
	NBR's unique relict Palouse grassland now integrated with the rare intermountain grassland type places the NBR in a position of being the sole refuge with the responsibility for protection and maintenance of this scarce and valuable habitat type
	Natural settings with highly aesthetic background (Mission Mtn Range and adjacent valley pastoral setting)
	Examine strategies to increase habitat connectivity with & between the NBR and surrounding lands
	NBR's habitats & location in Mission Valley make it a critical wildlife corridor for Flathead Valley animals

Qualities and Opportunities

Visitor Services & Outdoor Recreation

Diverse opportunities – Birding, Fishing, Scenic/Photographic

Picnic Area: Public support to maintain unique facilities for family gatherings

Environmental education opportunities

Simplicity of usability for public = opportunity

Maintain priorities and mandate, but also define carrying capacity for public use

Nominate Wildlife drive (Red Sleep Mountain Drive) as a scenic highway – funding opportunity

Review and expand Visitor Services and facilities

The plan is an opportunity to think about what experience we want visitors to NBR to have

There are wildlife viewing opportunities and facilities and that are wonderful

Love visiting NBR and seeing all the wildlife and landscape, especially from the upper part of the drive

Look for opportunities to create a wildlife viewing area along Highway 200 along with interpretive signs

Red Sleep Mountain Drive provides views of NBR along the southern slopes; consider adding short trails

NBR is one of the most visited refuges in the country; reach people to foster support for Refuge System

NBR ranks among or exceeds the visitation experienced by the “Urban Refuges” featured by the FWS

Public use of the NBR includes touring, hiking, fishing, wildlife viewing, photography, & environmental Ed.

FWS should ensure enhanced consideration of compatible wildlife-dependent recreational uses in the CCP

Examine and plan for all public use/access considerations (e.g., fee structures, possible tours, picnic area)

Examine current and future outlook for the visitor center, including need and potential for replacement

Consider future interpretive displays, materials and sale items, in native languages and in English

Examine future information availability and standards/criteria for inclusion of information/materials

Qualities and Opportunities

Cultural Resources

Historical value – what it represents - Cultural heritage

Foreign visitors’ fascination with U.S. Western history and wilderness drives them to visit NBR

Provide information about the Complex at NBR Visitor Center so that visitors travel to the other units too

Place to learn about natural, cultural and spiritual significance of bison to American Indians & our country

Identify, protect, consult with tribes about, and otherwise respect important cultural features & artifacts

Tribes have previously completed a cultural survey and report under contract to the FWS

American bison has a unique and special place on the landscape: ecological, spiritual and cultural

There are significant cultural sites located on the NBR which were formerly owned in trust for CSKT

CSKT believe that FWS should include in its CCP/EIS some history of the NBR and CSKT involvement

Qualities and Opportunities

Knowledge-sharing with neighbors

Community-based approach to invasive species, and other management needs

Messaging to draw visitors: What are the different messages to reach varying visitors?

Need to make sure there is good coordination of multi-agency weed management

Coordination among partners/cooperators nowadays is more reactive, rather than proactive

FWS, State and Tribes should work together, not separately, to manage wildlife on a landscape level

FWS should lead cultivating a relationship with other agencies and create a co-management committee

FWS, CSKT and MTFWP should start working as neighbors rather than unfriendly acquaintances or enemies

Healing bad feelings and mistrust will take time but it is worth the effort for all the Flathead Valley people

Maintain current relationships as well as explore new ones to the betterment of the resources

CSKT could complement the work of other partners working on none refuge lands where FWS is limited

CCP should address potential for opportunities for cooperative efforts with the CSKT at the NBR

Qualities and Opportunities

Refuge provides great research opportunities for universities and researchers

Opportunity to address how beneficial are research requests and data for the refuge and for the System

Opportunity to address if there a way to standardize research requests and the decision making process?

Design and conduct a carefully planned, assiduously implemented “integrated pest management program”

CSKT biological staff design & implement various research, I&M programs for resources within Complex

Qualities and Opportunities

Highlight priorities/qualities to get funding

Opportunity to address and pursue land swap of the quarter corners area

Great public access

NBRC needs to be again managed as the iconic and respectable refuge it once was

Internal fencing/pastures within NBR constitute a vital component permitting intensive management

Access considerations, including potential for an additional, or alternate, entrance such as at Ravalli Hill

Several newspaper articles on NBR staffing needs indicates likely considerable public interest in NBR future

Qualities and Opportunities

Open space – lack of development

Proximity to corridor to Glacier NP

Identify management priorities and stakeholders – how NBR can fill a gap

For the agency to integrate objectives from Native American policy into FWS activities

Need to prioritize issues and make sure CCP focuses on preemptive efforts

Opportunity for a land swap with the tribe for certain acreage

Recognize and provide opportunities for CSKT to engage meaningfully in all aspects of NBRC management

FWS urged to work as closely as possible with CSKT in developing the CCPs for the NBR Complex

Seek opportunities for CSKT to assume management authority to implement selected management actions

CSKT could shine in assisting FWS as stakeholder in the area of landscape conservation (i.e., bison)

CCP provides opportunity to present the public relevant facts on CSKT's with respect to NBR initial herd

Issues

Wildlife

Wildlife and domestic animals (cattle) co-mingling which spreads diseases

Carrying capacity

Bighorn sheep and diseases: comingling

Perception that staff doesn't manage bighorn sheep adequately – 80% of bighorn sheep lost to pneumonia

Fenced wildlife management is challenging; fences not as impermeable as previously thought: what to do?

Are we managing wildlife for public display: In what direction are the habitats and carrying capacity going?

Will there be too many visitors to the refuge in the future? Will this lead wildlife to habituate to vehicles?

Wildlife movements within and without the refuge

Predator management and refuge being perceived as source of coyotes moving to private lands

FWS allows excess bison to be transported to be slaughtered; that is merciless and cruel; don't do that

Each large mammal population on the NBR should be addressed in reasonable detail in the CCP

The CCP should provide a documented historical outline for management of each species on the NBR

Concern about wildlife and ecological integrity of wildlife habitat and other NBR land management issues

A healthy rangeland should be available to support elk, deer, big horn sheep and other roaming species

CCP needs to address the potential of NBR as grizzly bear habitat, including transient habitat & connectivity

NBR needs to coordinate with neighbors to manage bear attractants (e.g., fruit trees, beehives, garbage)

Hope that CCP aspires to carnivore & predator management based on a functioning ecological framework

Encourage healthy ecosystem (rangeland) to support healthy herds at sustainable population levels

Concerns over the spread of Chronic Wasting Disease in and around the NBR Complex

Predators & carnivores as an important element in controlling herd size & the risk of disease and its spread

CCP should consider opportunities for bison to access areas that may be available adjacent to the NBR

Identify & describe effects of alternatives on wildlife, particularly regarding obligations under wildlife laws

CCP should analyze how alternatives fulfill FWS's obligation under Endangered Species Act Section 7(a)(1)

CCP should consider application of MBTA and BGEPA on NBR to avoid unlawful take of covered bird species

Consider wildlife-friendly fencing to effectively contain bison while facilitating other species' movements

Analyze internal fencing's impacts to wildlife and habitat & consider removal to allow natural movements

The CCP needs to acknowledge CSKT's role in fisheries management at the NBR

Habitat

Issues

Enormous issues and problems with invasive plant species variety, distribution, acreage, and dissemination
Invasive species – existing new ones moving in (milfoil & rush skeleton): highly visible issue
Weed mitigation on tour road: Use wash station or mass transit to address this problem?
Finding balance between natural resources and visitors to NBR – 2 million persons drive Hwy 93 annually
Some areas require forest restoration while other are seeing timber encroachment on prairie habitats
Intermountain grassland has declined 95% from historic land base.
Less than 2% of Palouse habitat nationwide. This is a local priority. But, is it a national priority?
The Jocko River is in need of some stream restoration
Habitat management plans don't yield immediate results – very complex issue biologically and socially
Many people don't like to use herbicides to treat invasives, but the drawbacks of not using them is obvious
NBR should be managed to increase underrepresented habitat types typical of historic area vegetation
All types of habitat management should be addressed in CCP (e.g., range condition, water management)

Visitor Services & Outdoor Recreation

Issues

Increased visitation projections and their effect on visitor experience, wildlife, and infrastructure
No existing compatibility determinations for commercial filming and photography but increasing requests
Special Use Permits: Commercial tour groups (existing staffing is insufficient to properly manage it)
Hunting? Why is it seen as being very complicated? Needs to be addressed in the CCP. Tribal youth hunt?
Expanding the trail system and facilities
There is a need for a day use area
Coordination with CSKT on revamping the visitor center in Moiese is the top issue for any new NBR plan
Add tribal place names and words to informative kiosks around the NBR drive
Missed opportunities: Tribes' scenic turnout at the top of Ravalli Hill; work with CSKT on informative signs
Need better understanding of issues related to commercial filming and use of drones
Lack of staff curtails previous very successful and highly praised outreach programs among Valley schools
In addition to typical issues, visitor services should include maintaining access for the public
Opportunities for EE should range from cultural to factors that comprise a healthy ecosystem
CCP must provide CDs for all individual uses to maintain consistency with wildlife conservation goals
CCP should describe how each alternative supports the 6 priority wildlife-dependent uses on NBR
CSKT believe NBR Restoration Act would be effective way to increase public education & visitor experience

Cultural Resources

Issues

Why are tribal history, culture, land use, place and animal names being administered from NBR in Moiese?
Explore & display CSKT and potentially Blackfeet history throughout the Complex (on & off the reservation)
NBR must be preserved at all costs; it is a vital part of Americana and is crucial to wildlife preservation
CCP should provide appropriate opportunity to decide if additional cultural survey work should be done
CCP should detail CSKT's instrumental role in saving the country's last bison at Flathead Indian Reservation
CCP should detail CSKT's use of current NBR land for hunting, fishing, gathering, cultural & other purposes
CSKT believes the NBR Restoration Act would be an effective way to address CSKT history with NBR & bison

Partnerships & Communications

Issues

Take a 'landscape' approach to invasive species management, etc. – Neighborhood Management Plan
Need to ensure appropriate coordination of multi-agency wildlife surveys
The refuge needs to find effective ways to improve community outreach and involvement
Many people tired of commenting and never receiving any feedback (essential to produce quality product)
FWS failed miserably in communicating the planning process to the public: nothing in local paper, TV, radio
If FWS truly wants public comments, FWS must convince the public that their efforts will be listened to
The CCP must be concise, showing historical and proposed future management of the flora and fauna
FWS must consider how best to establish effective long-term coordination and cooperation with the CSKT

Research, Science, Inventory & Monitoring

Issues

Air quality & Climate
Ensure plan monitoring and mitigation = adaptive management
Maintain and improve what we have and is valuable: tackle and monitor invasive species
Included the formal & informal research & wildlife mgmt.. studies completed & studies currently underway
Inclusions of diverse habitats should be inventoried, mapped and maintained at NBR
Address role of fire and other disturbances in maintaining healthy ecological conditions on the landscape
CCP should prioritize identification of any new invasive species & have a plan for quickly eradication
CCP should describe present or potential invasive species (i.e., avian, amphibian, aquatic species, & weeds)
Address and consider impacts of climate change on rangeland and other ecosystems and wildlife habitat
Identify monitoring elements to evaluate rangeland conditions and carrying capacity
Identify monitoring elements to evaluate the health of bison, elk, deer, and bighorn sheep herds
The CCP should address and encourage development of a proactive plan to address CWD
Identify opportunities for research including ecological conditions, diversity of plants and animals, etc.
Include a plan for research and partnering with institutions and agencies both on and off the reservation
Explain how FWS will monitor status & trends in fish, wildlife, and plants on NBR per Improvement Act
CCP should include IPMP to prevent & control invasive species, & restore areas affected by weed incursion

Issues

Define/improve Refuge staff to manage resources and public-use opportunities

Current staffing levels and positions at NBR are inadequate to meet the purposes and needs

Ensure visitor safety – difficult with low staffing levels

Refuge boundary fence built to keep bison in: comingling due to inadequate staffing to maintain fences

Many refuge quarters are very old: what to do: maintain, replace, and phase out? Some are housing staff.

Existing facilities are insufficient for current needs: Headquarters office, visitor services building, etc.

There are poaching issues in the refuge

Some members of the public would like bring more visitors to the refuge – Move Visitor Center to Hwy 93?

Relocate NBR entrance along US Highway 93; Moiese is no longer relevant since it is no longer a train stop

Recruit tribal members to work in technical and support positions at NBR. Make it a priority.

There is a need to develop a NBR Friends Group

The Complex staffing chart needs to be filled right away to allow for immediate CCP implementation

NBR Complex staffing/budget needs should be treated with equal weight as other Region 6 Field Stations

NBR office and visitor center are very old and need major renovation/replacement (e.g., ADA compliance)

NBR staff should be selected for their skill, education and experience and not solely due to CSKT affiliation

Without a minimum of 10 professional staff necessary work cannot be accomplished at the NBR Complex

The citizens of this nation should always have a say on how NBR and other public lands are managed

None other CCP was created with the notion of contracting portions of refuge mgmt. to a non-FWS entity

Delegating refuge programs to a non-federal entity by stripping federal staff of resources breaches policy

Laws for retention of every refuge in the System were enacted in 1976 opposing refuge co-management

Amendments to the NWRSA removed language allowing “other entities” to manage refuge programs

FWS needs to begin seeking qualified refuge staff according to the previously approved (2015) staffing plan

FWS should finalize new AFA policy guiding AFA with Tribes on NWRs before negotiating a new CSKT AFA

CSKT believes the NBR Restoration Act would be an effective way to: manage wildlife and other resources

Issues

Expansion of wildlife opportunities – acquisition of adjacent lands through cooperation

FWS should take into consideration all previous comments (over 15+ years) as part of the CCP process

Local folks feel ignored & don't want to comment more after 15+ years of FWS attempts to give NBR to CSKT

Lack of sufficient staff and institutional knowledge of previous planning efforts for this planning effort

Is the planning process to develop the CCP an opportunity for groups and individuals to sue the Service?

All units of Complex should be considered and addressed in a single CCP; separating them is unwarranted

Separating units in two CCPs adds unnecessary costs, complexity and inconvenience the public and staff

Considerably more tax payers dollars will be saved if a single CCP is prepared for the entire Complex

The planning area is managed as a complex and should be planned as a complex – prepare a single CCP

No major issues have been identified at this time warranting full blown EIS versus an EA for the NBR

The Service should allow the process of preparing an EA determine the need for an EIS

CCP effort must be carried out to fulfil requirements of NWR System Improvement Act and NEPA

Policy articulated in CCP manual recognizes the refuge manager as the leader of the CCP planning team

Additional funding and staffing to the Complex should be added immediately to allow CCP development

Per refuge planning policy the planning team should include, at the very least, the refuge manager, deputy refuge manager, wildlife biologist, visitor services specialists and administrative officer

It is questionable that Region 6 RO Leadership can be objective and/or capable of an unbiased evaluation

Under no circumstances should the CSKT be allowed involvement with the CCP as a cooperating agency

The CSKT should have the same status as other stakeholders, NGO's or the public making views known

The Service must retain sole and full decision making authority throughout entire CCP process

Facilitate STEP programs with Salish Kootenai College or University of Montana students in all positions

Did FWS extend the comment period as another push by CSKT to control the process as well as the NBR?

FWS needs to stop catering to CSKT because of their continued conflict of interest to take control of NBR

Any "behind the scenes maneuvering" in the planning process must stop if a quality CCP is to be produced

Urgent to contact media outlets to set the record straight so general public isn't hesitant to get involved

The general public is hesitant to get involved as long as the CSKT are controlling the planning effort

To state that in order to comply with NEPA an EIS and an EA will be produced is ludicrous and wasteful

FWS must comply with Admin. Procedures Act, analyze all comments received, release the information

Most local people want FWS to retain complete management control of NBR as the previous 80+

Support for restoring the lands of the NBR to federal trust ownership for the CSKT based on Treaty

NBR entirely within borders of Flathead Reservation - reserved by the CSKT in the 1855 Treaty of Hellgate

The CCP should be all about how to continue the management of NBR, not about who should do it

CCP should not be approached with blinders, but open to the best partners for the FWS to work with

NBR belongs to all citizens; shouldn't single out CSKT as "cooperating agency", but should include others

Issues

Providing adequate funding to continue NBR mission during CCP development and in the implementation

Use files/data from 1998 NBR CCP effort including comments from staff, partners and neighbors

Don't discard insightful thoughts provided with much effort and time by many motivated citizens

CSKT should be the steward of NBR with federal government providing adequate funding

Complex staff funding levels/restrictions should be based on budgetary, not political concerns

NBR Complex project leader should organize public meetings with only support of regional office

No annual funding agreement with the CSKT should be a part of the CCP process

No special interest group should ever be given any portion of any public/federal land system

Many objections to CSKT involvement in NBR jobs as such forced employment violates fed. law

There is no need for CSKT involvement or management of federal taxpayer funds at the NBR

FWS is in violation of the 1997 NWR System Improvement Act due to a lack of a CCP for NBR

NBR federal workers, including CSKT members, have been left in limbo and turmoil due to AFAs

NBR staff should run the CCP process instead of FWS regional staff who are unfamiliar NBR

Secretary of Interior indicated he wanted refuge managers to have direct control over refuges

Why was the person hired to write and manage the Complex CCP was excluded from the process

Regional office personnel cost taxpayers thousands of dollars to fly from Denver for meetings

Suggesting a preferred alternative before CCP preplanning and/or planning violates Service policy

Alternatives stating FWS negotiating an AFA would be in direct conflict with CCP purposes

For this CCP FWS also needs to review comments submitted on the EA for the last proposed AFA

Recommend that CCP alternatives be left to the public to identify during the planning process

CCP process requires mandatory public involvement in compliance with mandates and policy

No personal information addresses should be disclosed unless it is in compliance with the FOIA

Why isn't the very skillful and knowledgeable planner located at NBR facilitating this CCP effort?

It's long overdue for the regional leadership to stop the vendetta toward the NBR and its staff

Strongly opposed to the transfer of the NBR to the CSKT or any other public lands to any tribe

If the NBR is being managed correctly and competently, why is FWS considering transfer to CSKT?

Absence of essential NBR staff and basic funding cannot support the demands of initiating a CCP

CCP should include purposes added in a 1921 Executive Order and in a 1958 Statute (exhibition pasture)

FWS should withdraw the unwarranted EIS feature from the NBR CCP and prepare an EA instead

Having CSKT sitting on the "Coordinating Team" would be an unacceptable conflict of interest

Support for alternative that returns to CSKT control of their traditional lands and cultural resources

CCP needs to provide explanation of what made FWS change the proposal to transfer NBR to CSKT

Explain why transferring NBR to CSKT would not equate privatizing public lands or transferring to states

The CSKT have a special relationship to the NBR that reflects their unique partner situation

Issues

Various Other Topics

CCP should evaluate economic impacts of various alternatives including savings due to NBR transfer (CSKT)

FWS must meaningfully engage with the CSKT in all phases of development of the EIS and CCP

FWS should honor its intent to invite the CSKT to participate in the CCP process as a cooperating agency

CCP is legally required to be a plan for refuge mgmt. of a unit of NWRS and not be a vehicle for abolition

Concerned about how CCP process is being carried out & whether it can result in a policy-based robust CCP

Engaging in 2 separate CCP/NEPA processes at once greatly increases workload and burden on Refuge staff

An EIS is a far more demanding and resource-intensive process than the usual process of preparing an EA

Running CCP/NEPA process from the RO cannot substitute for leadership and contributions at refuge level

Why was the NBR refuge manager sidelined in the CCP scoping meetings that have already taken place?

FWS is not following its own CCP manual, casting doubt on whether there will be a legitimate CCP process

Issuance of NOI should not have occurred without prior planning steps (e.g, assembling the planning team)

No indication that required preplanning has occurred to date, casting doubt on seriousness of CCP process

FWS has also already held two public scoping meetings that served little or no legitimate purpose

Scoping meetings were also poorly publicized and poorly attended; as if only to check off a required box

Plans for NBR management as a part of NWRS should be completed before considering any other AFA

Attempting to meld CCP process with an AFA process could significantly delay already long-overdue CCP

CCP process should be restarted according with the CCP manual, with adequate staffing and resources

Public and stakeholder involvement & input is a basic NEPA principle and should be embedded in CCP

Important that FWS comply with CCP policy dictating that the NBR project leader be the leader of the CCP

A quality staff of several different disciplines should be engaged to carry out the CCP planning process

NBR program is a field based program and decisions are always best when made at the field level

FWS should immediately replace refuge staff removed over recent years so planning process is credible

A proper pre-planning process requires 100s of hours of work to find and assemble all necessary data

Without a properly developed & run preplanning process it is impossible to develop an implementable CCP

Essential for FWS to identify & summarize options & issues that properly fall within sideboards & scope

FWS must take extra precautions to remain transparent and open to all stakeholders & the public at large

FWS must retain sole and full decision-making authority throughout the CCP process as required by law

NBR project leader should not just a bystander expected to implement a garbage in / garbage out plan

The FWS Region 6 Directorate should not be pre-selecting an alternative that will require an EIS for NBR

CSKT should comply with the NWRSAA delineations on co-management of Ninepipe NWR and Pablo NWR

FWS should not initiate negotiations on AFA, coop agreement or land transfer until the CCP is completed

Each CCP alternative must examine how management achieves refuge goals & upholds Congress mandates

Misleading to imply that most comments to Jan. 2017 opposed to the preferred alternative stated by FWS

Summary of Comments Related to the Third Notice of Intent (May 18, 2017)

Qualities and Opportunities

Wildlife

The plan will afford the opportunity to address the benefits of the existing “islands” in Ninepipe NWR

Opportunity to address the need for removal of predator friendly habitat features on WPAs

Flathead WPA & adjacent north shore lands support a high number and diversity of birds (229+ species)

Several species of special concern are found in the Ashley Creek drainage (shared by various WPAs)

Considering multiple habitat objectives may provide more migratory bird or other wildlife benefits

Consider future passage for native amphibians and reptiles where they occur: roads tend to be a barrier

Consider optimum size and configuration of each Complex parcel needed to meet wildlife needs/objectives

Maintaining large-sized snags and downed wood throughout Complex lands

Maintain healthy grassland and rangeland habitats for healthy grassland species populations

CCP should address specific bird populations & management coop efforts, including Trumpeter swans

Bird habitat conservation motivated designating Pablo & Ninepipe NWRs, this should be prominent in CCP

CSKT expects big game and all other wildlife species and predator management to be addressed in the CCP

Qualities and Opportunities

Habitat

Time to address the need for removal of stock ponds in Lost Trail NWR

Opportunity to address in detail the grazing and farming management on waterfowl production areas

Opportunity to address in detail all restoration efforts needed in waterfowl production areas

WPAs have unique qualities worth preserving and maintaining for current and future generations

In 2009 Montana Audubon designated Flathead WPA & adjacent north shore lands as Important Bird Area

U of MT researchers describe Flathead Lake as one of the cleanest lakes in populated areas in the world

Flathead Lake WPA wetlands and vegetated riparian buffers help protect water quality in Flathead Lake

Complex lands are becoming increasingly vital to sustaining migratory and resident birds and wildlife

Complex lands sustain T&E plants and animals and healthy populations of game and nongame species

The quality of the Complex habitats are important for wildlife under development and agriculture pressure

Complex units are an integral and irreplaceable part of a larger mosaic of protected lands in western MT

Value of Complex lands will become increasingly important as development and climate pressures increase

Need greater habitat protection and improvement over time as Complex lands are critically important

Maintain and enhance Complex habitats to ensure wildlife movement and ecological processes function

Qualities and Opportunities

The CCP affords the opportunity to address the need and maintenance of trails and associated structures
 Flathead Lake WPA “beach” attracts hundreds of visitors. Is this an environmental education opportunity?
 Lost Trail NWR is a great place to see native flora and fauna.
 Great opportunities to attend excellent educational programs and field trips at Lost Trail NWR
 Find creative management strategies allowing public to enjoy as well as conserve Complex values
 Don’t underestimate value of Flathead Lake WPA in providing/maintaining iconic scenic beauty
 Smith Lake WPA is a magnet for birds as well as bird watchers, fishermen, and other visitors
 The units of Complex provide innumerable opportunities for field trips and outdoor recreation
 Bring cross-section of the community out to Complex units to learn/appreciate/understand
 Celebrate 10-year anniversaries with field trips and other outdoor recreational events
 Encourage school programs emphasizing importance of local wildlife, hunting, and open space
 Send out newsletters, use social media to share what it is you have
 Complex lands have highly desired public recreational opportunities near population centers
 Create strategically located self-guided trails, boardwalks, viewing towers, field trips, classes, etc.
 Explore new wildlife watching and hunting opportunities that also allows for various other uses
 CCP provides an opportunity to examine and plan for public uses and access considerations
 Re: access by CSKT citizens, CSKT believe the existing MOA between FWS and CSKT works well
 CCP should address all visitor services issues for Ninepipe & Pablo NWRs in NBR visitor center

Qualities and Opportunities

Blasdel WPA: historic Blasdel Barn is very photogenic and highly cherished by local community
 Widespread interest on Blasdel Barn for commercial filming and photography. Can this be an opportunity?
 Breathtaking views offered to all by Flathead Lake WPA is important to the cultural identity of the area
 The Blackfeet (Pikuni) people may have some history near Lost Trail NWR – find ways to display this
 Explore & display CSKT and potentially Blackfeet history throughout the Complex (on & off the reservation)
 Ninepipe & Pablo NWRs are each on lands that are beneficially-owned by CSKT, and held in trust by the US
 Revisit FWS interaction with Tribal citizens, Reservation community re: indigenous culture, language, & land uses
 FWS becomes a leader in how federal agencies approach partnerships with tribal governments in Indian country
 Inventory, preservation, and management of cultural and historical resources in CCP are CSKT high priority
 CSKT request that FWS consult with CSKT regarding issues consistent with Executive Order No. 13175
 Address FWS to recruit federal staff with knowledge of local tribal culture, or train existing staff accordingly
 Opportunity to revisit FWS’ approaching TEK regarding Ninepipe, Pablo, Lost Trail NWR & NW MT WMD

Qualities and Opportunities

Partner with local, state, and tribal agencies, conservation organizations, and others to identify needs

Work with partners to help identify strategies and solutions that increase government resources efficiency

Creatively use local skills and resources to improve management within context of surrounding landscapes

Management solutions require engaging/partnering with adjacent agricultural producers and neighbors

Partner with neighbors to address wildlife viewing, access, invasive species, and law enforcement issues

Partner with River to Lake group to protect ecologically significant areas near and provide buffers to WPAs

Work with MTFWP to complement management and goals of the North Shore WMA and Flathead L. WPA

Partner with River to Lake in protecting Blasdel WPA and properties surrounding it as wildlife corridor

Partner with River to Lake to restore riparian habitat and improve water quality, fish and wildlife habitat

Maintain and increase habitat conservation partnerships with River to Lake throughout the Flathead Valley

Consider the place that individual and collective CCPs have in the context of other conservation programs

Consider the specific values/contributions that Complex units add to local/regional/international efforts

Work cooperatively with neighbors, land trusts, and agencies to preserve/enhance farmlands and soils

Share, coordinate, and develop complementary plans to cut costs and efficiently address weed control

Work cooperatively with adjoining landowners to extend the FWS area of influence over a larger landscape

Seek partners and creative fund-raising to incorporate into the Complex or protect additional parcels

Work with neighbors to establish/re-establish a more historical and sensible fire regime

Partner with volunteers and with local fire agencies to help reduce adverse impacts of fires

Design an outreach program to increase local support for the lands, volunteer base, & improvement ideas

Partners and foundations are often willing to fund these various kinds of projects on public lands

CCP should acknowledge history & future Tribal cooperation with FWS in Ninepipe & Pablo NWRs

Qualities and Opportunities

- Ongoing research on ospreys regarding water quality issues (mercury) on reservoir fish (specially Ninepipe)
- Public benefits of these units are significant and require commensurate level of management and research
- Monitoring helps ensure management is responding appropriately to resources stressors and challenges
- Conduct research and monitoring collaboratively to collect needed information to protect landscape value
- Use American Bird Conservancy surveys that validate and record Flathead Lake and Smith Lake WPA values
- Propose in the CCPs to manage with climate change in mind so that there is a degree of flexibility
- A cross-section of the community could visit units of the Complex to develop/implement useful projects
- Develop educational and research programs unique to each area designed for next generation employees
- Create/publicize rules that restrict wildlife collection for recreational or scientific study
- Closely monitor and when indicated, decrease cattle-grazing to benefit wildlife habitats
- CSKT recommend CCP address surveying & monitoring of nongame birds, as well as amphibians & reptiles
- CCP should address contingencies for aquatic invasive species whose profile was recently elevated in MT
- Address any projected wildlife, habitat, animal health, or genetics activities or needs in the CCP
- Address projected, likely, or potential impacts of climate change on habitat, species, water, forage and fire

Qualities and Opportunities

- Time to address DNRC state leases (school trust lands) and land exchanges with Lost Trail NWR
- Opportunity to figure out and clarify what water rights the Service has in units of the Complex
- Opportunity to develop a brand new prescribed fire plan for the waterfowl production areas
- Revisit staffing priorities and structures to ensure that Lost Trail NWR and the WPAs achieve their missions
- Staff positions in all units of the Complex should be increased to ensure widespread compatible public uses
- Current staff levels are far from sufficient to meet the needs and pressures placed on the Complex units
- Each CCP needs to identify needs, locations, and opportunities to expand its boundaries/protect lands
- Increase staffing to closer to historical levels so that the CCPs can be properly implemented
- Ensure that all infrastructure, wildlife/plant/natural barriers, and traffic speeds are wildlife friendly
- Ensure all Complex structures are screened or capped to prevent entrapment of cavity seeking wildlife
- CCP process can address in depth the history before, during & after establishing Ninepipe & Pablo NWRs
- CSKT has valid existing rights Tribal uses recognized by Congress within Ninepipe NWR and Pablo NWR
- Reservoir conditions & water management issues are all components that should be addressed in the CCP
- Address facilities maintenance expectations, needs, budget & costs for facilities, including fences and trails
- Address FWS expectations or outlook for LE responsibilities & jurisdictional impacts and cross-deputization
- Address the existing vacant positions, as well as expected, desired and potential positions looking forward
- Address FWS plans, expectations, budget & cost outlooks for fire control and management, prescribed fire

Qualities and Opportunities

Develop comprehensive plans for each unit taking into account regional landscape and conservation needs

Goals should consider Complex units within larger landscapes, stressors, and area conservation programs

Assess how Complex units complement and strengthen local, regional, and transboundary conserv. efforts

Importance and public benefits that Complex provides have increased as Flathead Valley grows/develops

WPAs in Flathead Valley truly deserve thoughtful consideration to ensure endurance of benefits provided

Manage in Complex lands in context with local, regional, and international conservation efforts

CCPs should consider the land context and value to wildlife as well as their value to buffer development

If applicable, establish a means to ensure each property has sufficient water rights in perpetuity

Whenever possible, control, minimize, or decrease light pollution throughout the Complex's habitats

To the extent possible reduce noise pollution or use vegetation or other means throughout Complex lands

NRCS is always available to assist FWS on WRP Program objectives, or specific easement goals & objectives

CCP would assist in helping public understanding of FWS' newly-designated Western MT NWR Complex

FWS leads how federal agencies approach federal trust responsibility towards tribes within NWR mgmt.

CSKT encourage FWS to examine Canadian Wildlife Service's Impact and Benefit Agreements on NWAs

CSKT believe CCP presents opportunity for FWS to encourage field-level implementation of FWS' TEK

Issues

Mercury levels in refuges fish (especially Ninepipe reservoir) also affecting raptors (osprey)

Complex staff don't manage the fisheries resources on the reservoirs in Ninepipe and Pablo NWRs

Lost Trail NWR is home to various Federally and state listed species, which require special management

Lost Trail NWR: issues with nonnative fish species on streams and nonnative plant species in wet meadows

Issues with hunting of non-approved species (bears, coyotes, ground squirrels, etc.) in Lost Trail NWR

There are issues with wolf management in Lost Trail NWR

Blasdel WPA: is surrounded by urban development, has non-native habitat with little native wildlife value

Is the increasing and spreading urban encroachment around Flathead Lake WPA affecting the wildlife?

Consider what the best or multiple values (e.g., breeding, rearing, migratory) that Complex lands have

A diversity of habitat or management objectives over Complex units should be evaluated with public input

Invasive species should be dealt with best management practices to avoid impacts to native plants/animals

FWS exists to offer up animal bodies for murder and killing; I want humane treatment of all animals

We need much more consideration of what the handling of the bison will be at NBR

Other wildlife needs to be protected too on our national lands, such as wild horses

The CCP should address CSKT's management of the fisheries resources in Ninepipe NWR and Pablo NWR

Issues

Habitat

Enormous issues and problems with invasive plant species variety, distribution, acreage, and dissemination

CSKT and the Complex have very different habitat management priorities in Pablo and Ninepipe NWRs

CSKT and Complex habitat and reservoir management priorities is not conducive to migratory bird mgmt.

There are significant cattle trespass issues on Pablo NWR and insufficient communications

Refuges reservoirs help spread invasive species via thousands of miles of irrigation system carrying seeds

Elk populations are heavily impacting Lost Trail NWR aspen habitats

Lost Trail NWR staff are in need of a Spalding's catchfly recovery plan to help guide habitat management

Grazing by free ranging cattle upstream from Lost Trail NWR causing siltation problems on refuge habitats

There are timber encroachment issues on Lost Trail NWR habitats

Weyerhaeuser has requested Lost Trail NWR to change easement language to be able to sell its properties

Flathead WPA is IBA listed; many weed issues and funding has been inadequate to address invasive species

There are increasing issues with development encroachment around Smith Lake WPA

This is national public land, not local land for profiteers or federal and state employees to maul

We need land to preserve and protect wildlife and birds; that should be the aim of this plan

There should be no burning, no chemical applications, no new roads built, and no logging allowed

Grazing violations in Ninepipe NWR and Pablo NWR have contributed to invasive weed infestations

There are impacts to Ninepipe NWR and Pablo NWR habitats from unauthorized farming practices

Lack of funding and staffing have prevented NBR Complex from complying with its Integrated Pest Mgmt.

Complex needs to fully comply with State/County weed control laws governing landowner responsibility

Consider the separate and cumulative impacts that invasive species, climate change and urbanization have

Cattle profiteers should be taken out from our public lands, and they should buy or lease their own land

Grazing violations in Ninepipe NWR and Pablo NWR contribute to widespread invasive weed infestations

Unauthorized farming practices have degraded wildlife habitats within designated refuge boundaries

Issues

Ninepipe and Pablo NWRs are currently closed, to the general public, to trapping and hunting
 Safety and legal issues need to be addressed due to road hunting adjacent to Lost Trail NWR
 Waterfowl hunting on Lost Trail NWR: redraw hunting boundaries? Insufficient staff and waterfowl studies
 Due to level of visitation, Smith Lake WPA is in need of additional parking and a boat launch
 Smith Lake WPA has off-road vehicle trespass, vandalism, fires, and parking lot parties issues
 Trapping issues on the NW MT Wetland Management Districts waterfowl production areas
 Issues with availability and maintenance of trails and associated structures on waterfowl production areas
 Hundreds of trespass instances every year on Flathead Lake WPA from people wanting to use the beach
 Almost impossible to post boundary signs in parts of Flathead Lake WPA because of lake level variations
 There should be no hunting or trapping to cause misery and torture to wildlife. Protect and preserve them.
 Calling the murder of wildlife and birds "wildlife dependent recreation" is a disgusting and deplorable scam
 Killing and trapping wildlife is brutality and insanity
 Recreation in and near WPAs pose increasing challenges requiring increased education and interpretation
 Fix up dilapidated walking path, outhouse, and weed and bee-infested recreation area at Ninepipe NWR
 Ninepipe and Pablo NWRs are sorely underused for environmental education
 Trails: Need to be inspected, upgraded and replaced as needed for safety, staff needs, and public access
 Joint wildlife viewing trail for Ninepipe NWR (Tribe, State and FWS) needs replacement & weed control

Issues

Lost Trail NWR staff is having issues with the maintenance of historic buildings on the refuge
 Lost Trail NWR staff need to find ways to secure currently unprotected pictographs and address access
 Blasdel WPA: historic Blasdel Barn is in a state of disrepair and there are many trespass issues with it
 Blasdel WPA: historic Blasdel Barn is a liability issue – what to do with it? Keep it? Divest area? Restore it?
 Blasdel WPA: historic Blasdel Barn would cost nearly \$1 million to restore it solely for preservation purposes
 Blasdel WPA: serious law enforcement issues with trespassing and arson fire danger

Issues

- Lack of sufficient communications between CSKT and the Complex on reservoir management and farming
- Insufficient communications between CSKT and the Complex on leases for grazing and farming on refuges
- Complex personnel unable to establish effective communications with different tribal departments
- The Complex needs to find effective ways to improve community outreach and involvement
- It appears that the public has some confusion about the management of Smith Lake WPA
- Recreation in and near WPAs pose increasing challenges requiring increased management, outreach, & LE
- Public outreach is a paramount need for the Complex to ensure success and long-term programs
- Most of the public has no idea who manages the Flathead County WPAs and who to contact
- Lack of info re: the units involved in this CCP proposal precluded detailed ideas, comments or suggestions

Issues

- Address changing weather patterns, including extended summer droughts and increased temperatures
- Need to address the value that Complex units provide for wildlife, water/groundwater quality & quantity
- Overall goals and objectives should be based on science and wildlife needs, rather than current budgets
- Control first the invasive species that have the greatest impact on native species and habitats
- Identify extent, distribution, and impacts of invasive species to habitats/wildlife and management strategy
- Each CCP should have a solid integrated noxious weed plan (and include funding), including partnerships
- Ensure proper staffing to allow professional oversight and coordination with scientific studies
- Lack of funding/staffing prevented Complex from complying with its integrated pest management program

Issues

Complex staffers are unclear on their management authority on Ninepipe and Pablo NWRs

Inability to enforce wildlife and other conservation-related laws on Ninepipe and Pablo NWRs

Lost Trail NWR has great need for maintenance staffing and fencing crew

There are many leased-land cattle trespass cases in Lost Trail NWR due to unmaintained fence

Lost Trail NWR has great need of a habitat management plan, a fire plan, and fire funding

Lost Trail NWR staff has great need of a report detailing the refuge's water rights

Some members of the public have made requests for grazing on Lost Trail NWR lands

Realignment calls for no staff at Lost Trail NWR; so no full-time officer to address trespass issues

Issues of water rights on WPAs: some un-adjudicated or no water rights owned at all

Lack of uniformity of prescribed fire management: varies among WPAs and refuges

Uncertain status and need for repair and maintenance of fences and water control structures

Difficulties with the manipulation of water levels on WPAs

Issues in Batavia WPA: unmaintained dikes, flooding neighbors: highway department mitigation

Weyerhaeuser logging activities and transportation causing access issues at Smith Lake WPA

Lost Trail NWR staff has issues with ability to enforce laws on Smith Lake WPA

Enormous difficulties enforcing closure of parts of Flathead Lake WPA – MT was sued trying it

Complex staff doesn't have the personnel or means to patrol Flathead Lake WPA appropriately

There are intrusion issues on Pablo NWR related to the CSKT-operated Race Track on site

FWS is far too stupid for giving away our national land to cheap leasing to plunderers and profiteers

Violations of easement conditions and an intrusion into the Pablo NWR by a CSKT operated Race Track

Ninepipe and Pablo NWRs should only be used by CSKT for purposes compatible with the refuge purposes

Congress reiterated CSKT rights to Ninepipe & Pablo NWR lands for purposes not inconsistent with easements

MOU between FWS, CSKT and BIA recognized farming program within NWRs as consistent with NWR purposes

As part of US legislation, CSKT retains congressionally-recognized reserved rights in Ninepipe and Pablo NWRs

Issues

Various Other Topics

Uncertainty of the compliance status of the conservation easements due to insufficient inspections

Differences in land use regulations among refuge neighbors and partners (Tribes and County governments)

Why is Swan River NWR not in Complex even though it is in same watershed and mentioned in realignment

There are various and diverse encroaching issues bearing on Pablo NWR, Ninepipe NWR, and the WPAs

Complex staffers don't fully understand the issues between the tribal and county water rights: compact

Safety (poor visibility due to dust) and road condition issues adjacent to Lost Trail NWR from logging trucks

Might CSKT want to include ancestral lands (e.g., Lost Trail NWR) on future Annual Funding Agreements?

Want that on national public lands, owned by Americans, you to stop acting so notoriously ugly to wildlife

If what you are planning is wildlife and bird murder, let the public know what you are really about

Public lands belong to the American public and they need honesty. Don't use obfuscating language

Lack of information regarding units involved in the CCP precludes detailed ideas, comments or suggestions.

Had FWS followed usual preplanning steps more would have had opportunity to respond more fully

Continuing and troubling compatibility issues at Ninepipe NWR and Pablo NWR involving the CSKT

Previous AFA negotiations have precluded the Complex from addressing issues identified in late 1990s

All units of Complex should be considered and addressed in a single CCP; separating them is unwarranted

Separating units in two CCPs adds unnecessary costs, complexity and inconvenience the public and staff

Prepare all overdue CCPs within Region 6 before revisiting the Lost Trail NWR CCP, which is not due yet

Considerably more tax payers dollars will be saved if a single CCP is prepared for the entire Complex

The planning area is managed as a complex and should be planned as a complex – prepare a single CCP

WRP easements adjoining Complex lands and their provisions should be points of focus in planning process

Incorporate WRP mission and management objectives into the CCPs planning process and objectives

Avoid incorporating management scenarios into CCPs that conflict with WRP Program statutes/easements

We are sick & tired that FWS seems to hire & put in charge only wildlife murderers, beginning with D. Ash

Want investigation on FWS hiring practices; Is there a requirement to murder wildlife in employment app?

Had FWS completed preplanning steps there would have been opportunity to respond fully during scoping

Lack of opportunity for preplanning prevents certainty of possible compatibility issues on all Complex units

FWS should include history and legal status of the Ninepipe and Pablo NWRs in the CCPs to educate public

Public may be unaware of CSKTs' ownership of the lands upon which Ninepipe & Pablo NWRs are located

CSKT had a role in originally requesting Ninepipe and Pablo be federally-designated as conservation areas

CSKT granted a perpetual easement to US for use of the Ninepipe & Pablo properties for refuge purposes

It is in both CSKT's and FWS' best interest in educating people about NWRs historical and legal landscape

CSKT asks cooperative efforts with CSKT to be addressed in the EA under all the CCP/EA alternatives