

Blue Goose Alliance Bulletin

#71 – December 14, 2010

Vice-President Bill Reffalt submits comments on behalf of the Blue Goose Alliance on the Draft Comprehensive Conservation Plan for the Charles M. Russell National Wildlife Refuge, Montana

On December 10, 2010 Blue Goose Alliance Vice-President, Bill Reffalt sent a letter to Laurie Shannon, Planning Team Leader Charles M. Russell NWR commenting on the Draft Comprehensive Conservation Plan for the Charles M. Russell NWR, Montana

His letter follows:

**Blue Goose Alliance
1050 Matador Dr., SE
Albuquerque, NM 87123**

December 10, 2010

Laurie Shannon
Planning Team Leader
Charles M. Russell NWR
P.O. Box 25486
Denver, CO 80225-0486

RE: Charles M. Russell National Wildlife Refuge (CMR) Comprehensive Conservation Plan (CCP)

Sent by email December 10, 2010 to: cmrplanning@fws.gov

Dear Ms. Shannon:

The Blue Goose Alliance appreciates this opportunity to comment on the draft CCP for this important, ecologically significant wildlife area in Montana. The Alliance is a 501(c)(3) organization dedicated to the integrity, status, stature, and perpetuation of the National Wildlife Refuge System (NWRS). Our organization is national in scope, and its members represent past refuge managers and administrators, dedicated members of friends groups across America, and other people having a deep and abiding commitment to the Refuge System, its goals, and its personnel.

The Alliance accepts, in general, the preferred alternative outlined in the CCP—with some reservations and some suggested changes as discussed below. The stated goal of “restoring natural ecological processes” is quite ambitious and certainly will require considerable diligence and commitment by the refuge administrators and managers. It is obvious that refuge field personnel and managers lack the full range of needed inventory, status, and trends information by which to make fully informed decisions in many instances. Detailed information on scores of species and ecological components is lacking or entirely absent. The refuge must commit to initiating and maintaining a range of monitoring and inventory studies and well-designed research projects to gather key data-sets by which to guide future decisions within the framework of the final preferred alternative. In many ways, the CCP is primarily a framework for future decision-making and a commitment to overall goals and objectives over its 15-year timeframe.

Modifications, Corrections, and Further Analyses Needed

The Alliance urges the Fish and Wildlife Service to amend the preferred alternative in several ways. The suggestions we offer would, in our view, further the goal of restoring ecological processes throughout the refuge, bring a wider range of wildlife benefits to the interested publics that support and utilize the refuge, and conform to the overall mandates in the National Wildlife Refuge System Administration Act (NWRSA: 16 U.S.C. 668dd-668ee): 1) achieve the primary purpose(s) for which the refuge was established (which includes numerous other mandates of federal laws such as the Endangered Species Act, Wilderness Preservation Act, Historic Preservation Acts, Paleontological Resources Protection laws, etc.) and, 2) fulfill the mission of the [National Wildlife Refuge System] as mandated in the NWRSA.

Wildlife – Bison: Although the CCP contains quite a few short discussions related to possible reintroduction¹ of bison to portions of CMR, the upshot seems to be that FWS and the Refuge intend to base that decision ultimately on as yet very uncertain actions of the State Department of Game and Fish. The bison is a keystone species (extrapolating from a term used in the CCP, it qualifies as a “sentinel wildlife species” along with the wolf, cougar, and bears) for the CMR ecosystem. The ability of the species to affect its environment, including micro-environments, is well documented in the wildlife literature. There are numerous biological and ecological arguments favoring the reintroduction of bison to the CMR. In addition, the current situation regarding the FWS-managed bison populations provides a strong incentive for consideration of an introduction effort at CMR.

The FWS has committed to a “meta-population management concept” for its fenced bison herds in recent years because of the serious threat of genetic drift. The concept requires that several smaller herds be managed in a coordinated fashion as though it was a single population. In that manner, the “herd” is enlarged to a population level at or above the threshold required to maintain the full range of genetic diversity within that population. In general, the number required for a meta-population is in the range of 1,500 – 2,500 bison. Current FWS fenced herds typically number 500 or fewer (with the exception of Wichita Mountains NWR in OK). Recent genetic analyses have demonstrated that the bison at the National Bison Range in Montana harbor unique alleles but the NBR does not have sufficient range to support a population level able to assure perpetuation of those alleles. The CMR is an ideal habitat for reintroduction and growth of a herd derived from the NBR genetic origins that would ultimately permit achieving the minimum population levels required to protect that highly valuable and unique gene-set.

The CCP admits that at least 30,000 acres or possibly more could be available for a fenced bison herd at CMR. Although there is reluctance to commit to the investments required for a “tall-fence” management regime for another bison population, it offers a cost-effective and readily available alternative to the options currently available to the agency. The Blue Goose Alliance recommends that the preferred

¹ Following submission of these comments to FWS, it was pointed out that “restoration” would have been the correct term to use instead of re-introduction. The bison was endemic to the CMR area.

alternative be modified with a commitment to reintroduce bison to the refuge within the first five years of implementation of the CCP; that the introduction be coordinated with the NBR, and other refuges having NBR founding genetic structure, with the State of Montana, with the local interest groups and with the American Prairie Foundation. We also make further recommendations later in this document concerning this proposal – see the section related to Land Acquisition, *infra*.

Wildlife – big game species: The Alliance supports the concepts expressed in the CCP regarding big game populations in the refuge. CMR has an excellent opportunity to provide unique hunting experiences to a large number of hunters. Providing quality hunting experiences however, should go beyond having large “trophy-sized” animals available to the hunters. Olaus Murie, in his seminal book, *The Elk of North America*, observed (p. 330), “There is another phase of quality that involves human use of wildlife resources. Sportsmen themselves often deplore the degeneration of the sport of hunting. ...Usually this means wild game in the true sense, as well as other indigenous species that add interest; as nearly as possible a *wilderness flavor*, and room enough so that hunters are not concentrated.” [Emphasis added] Murie then went on to quote from Aldo Leopold’s *Game Management* as a caution against “too much management”, “The recreational value of a head of game is inverse to the artificiality of its origin, and hence in a broad way to the intensiveness of the system of game management which produced it.” (Murie: p. 330).

Quality hunting also extends beyond killing a large, well proportioned male animal. It covers the hunt from pre-hunt planning to and selection of hunting companions, hunt location and type, timing, scouting the area whenever possible and allowed, and proper retrieval and care of the meat, hide and cape or other desired parts of the successful hunt. Some authors have argued for hunts that require physical, as well as other stresses on the hunter. “Memorable experiences” most often the subject of campfire conversations typically are those that demanded an extra measure of hunter effort, including the struggle to pack the animal out once it was shot. The CMR hunting program should allow the hunters opportunities commensurate with the philosophies expressed by Murie and Leopold.

Wildlife – other: The preferred alternative should be modified to expand and improve the discussion and commitment to large predatory animals, such as wolves, cougars, bears, foxes, and bobcats. As with the reintroduction of bison, the basic justification for this recommendation is: they belong. They contributed in the past and could contribute again to natural ecological processes and their restoration – the primary goal of the preferred alternative. Without them as functional components of the ecosystems of the refuge, it is unlikely that the intended goal can be achieved. An adequate amount of information by which to make decisions related to several of these species is not readily available. However, the refuge should commit to their enhancement/restoration within the refuge context and to gathering the needed information to make it possible to accomplish that end.

Wildlife – threatened and endangered species: The Alliance supports previous and planned efforts of the refuge to restore and aid the recovery of animals such as the black-footed ferret and urges expanded efforts to assist species such as the swift fox and piping plover, as well as those “species of concern” that often can benefit the most by attention from management. The refuge represents a large island of habitats dedicated to “wildlife first” in an extensive area of historically important wildlife systems now largely committed to production of domestic animals and private enterprise. CMR’s CCP should provide programs that enhance wildlife (including plants), their habitats, populations appropriate to the limitations of the habitats, and the ensuing public benefits. It is a key role of national wildlife refuges that no other federal areas have been charged to provide.

Wilderness: The history of wilderness study and recommendations for the CMR is tortured by the conflicts generated by split jurisdictions lacking in a strong primary focus, relative obscurity of the refuge

system and its far-flung units, and internal debates within the FWS over the role of wilderness in refuge management. Uniquely (within the NWRS context), proposed wilderness recommendations for CMR have rather consistently decreased in spite of the size of the refuge, its remoteness, and the typical condition of its landscapes.

Complicating the picture even more has been the often subtle, but on-going proliferation of vehicle trails throughout the refuge over the past 30 years or more. The result has been neither beneficial to the concept of wilderness nor supportive of the expressed goal of refuge management to “restore natural ecological processes throughout the refuge.” The Alliance recommends that the wilderness portion of the preferred alternative receive fresh analysis and discussion. Wilderness designation supports maintenance and restoration of natural ecological processes, is generally beneficial to most of the species which CMR management has placed in priority status, and is quite appropriate to the overall landscape profile of the refuge.

The proposed reductions in the preferred alternative and in other alternatives in the CCP are primarily based on paper-thin justifications that fail to consider the wildlife and habitat benefits much less the contributions wilderness status will provide to restoring ecological processes. The presence of barely visible “two-track” trails certainly does not warrant elimination of proposed wilderness. Even the presence of an inholding cannot be a sole reason to drop a multi-thousand acre wilderness proposal. Two-tracks can heal and disappear; inholdings can be purchased. Refuge management should focus on the potential benefits from wilderness within the refuge context and on the fact that in 1970-1975 there were nearly 500,000 acres within the refuge that were believed to qualify for wilderness designation by knowledgeable people. A fresh open-minded look is desirable and justified.

Roads: The ecological effects of roads are pervasive and, in natural landscapes, mostly negative and very damaging. They include erosion, air, water and soil pollution, spread of invasive exotic species, road mortality and avoidance by wildlife, modification of animal behavior, habitat alteration and fragmentation, and the isolation of populations that can lead to extirpation, among others. The analyses contained in the draft CCP are misleading and inadequate. There is an extensive literature available to researchers and managers including a number of pertinent reviews of larger segments of the literature. (see for example: Trombulak, S.C. and C.A. Frissell, 2000. *Review of Ecological Effects of Roads on Terrestrial and Aquatic Communities*. Conservation Biology, Vol. 14, No. 1, February, pp. 18-30; Noss, Reed, 1995. *The Ecological Effects of Roads*. Found at <http://www.wildlandscpr.org/ecological-effects-roads>. (last accessed 12/10/2010). Beyond these and other reviews of the literature can be found an abundant and frequently pertinent literature that should be used by the planning team to reassess the discussion and conclusions in the CCP related to roads.

The Alliance strongly supports the provision found in Alternative B calling for the closure of 106 miles of roads and trails within the CMR. In addition, we believe that a continuing review of all roads and trails within the refuge is warranted and, with study and analysis, could reveal additional road closures that would reap large benefits for wildlife, habitats and ecological processes. We recommend that the 106 mile closure provision, and an on-going review/possible closure provision, be added to the new preferred alternative we seek. Loop roads have an especially high potential for causing isolation of populations of small mammals and some amphibian-reptile species that can lead to local extirpation. Such loop drives should be avoided as should any vehicle passages through sensitive habitats. Seasonal closures should be used to offer wildlife populations full sanctuary from vehicular and related disturbance during breeding and parturition periods. A more thorough and thoughtful review of the literature and application of research data to the CMR roads almost certainly will result in needed changes in the analyses, and in the conclusions reached in the CCP. We support such change.

Land Acquisition: The Alliance strongly supports the concepts expressed in the CCP that call for land acquisition to mitigate complex situations such as sometimes occur with State land sections and the grazing regime they entail, and with strategically located private lands within the refuge (such as any that occur within or immediately adjacent to proposed Wilderness). The CMR land acquisition needs are large enough and the management problems that can be resolved through strategic land acquisition important enough that we believe a full-time realty presence should be established at the refuge headquarters so an on-going program can be initiated to take advantage of opportunities and work closely with BLM, state and private lands representatives to assure that important priorities are given first attention and that whenever funds are available they can be used effectively and quickly.

In addition to our recommendation that a permanent realty function presence be established at CMR refuge headquarters during the duration of the program resulting from this CCP, we further believe that the refuge, the Region, and the national office should take steps to seek Secretarial support for exercising an option available him under the Federal Land Policy and Management Act of 1976 (Public Law 94-579; 90 Stat. 2743-2794). Section 204(c) of that statute permits the withdrawal of public lands for up to 20 years which, in the case of a National Wildlife Refuge withdrawal, becomes permanent unless the Congress revokes it. This provision, used in the special situation of Alaska during the Alaska Lands Act legislative efforts in 1979, has not been widely used since its passage. However, the CMR has a need to expand strategically and there are extensive public lands abutting the refuge that can help resolve important wildlife and habitat resource issues.

One potential need would be the expansion of the refuge boundary along its northern and eastern portions to encompass the headwaters and watersheds of the numerous streams that enter the refuge from the Phillips County line eastward to the vicinity of the Willow Flat Reservoir. This strategic expansion would permit the refuge to resolve the water quality issues and erosion problems generated by grazing regimes that give little account to the needs of downstream fish and wildlife. Working with the BLM and landowners in that area could bring greatly improved management arrangements that vastly improve habitats and wildlife benefits within the refuge. It would also contribute to programs to control invasions by exotic plant species along riparian habitats within the refuge.

A second potential exists in relation to the proposal made at the outset of these comments. A strategic expansion northward in the western end of the refuge would permit it to accommodate a large population of bison, as well as further accomplish the watershed and stream protection discussed in the first potential expansion, above. This proposal would reach westward from T23N-R31E to approximately T23N-R23E, on selected portions of the area having largely public lands. As with the above suggestion, it would be vital to the refuge to coordinate with the BLM and private landowners to achieve this expansion and ultimately, the Secretarial withdrawal of these potential wildlife habitats. But, the outcome, if successful would achieve a major improvement for wildlife and the public within the CMR.

Once again, we thank you for the opportunity to provide comments and suggestions to your large and complex CCP document.

/S/ William C. Reffalt

William C. Reffalt,

Vice President and Issues Coordinator, Blue Goose Alliance

This Bulletin and all previous Bulletins are available in PDF format at <http://www.bluegoosealliance.org>

The mission of the Blue Goose Alliance is to promote the establishment of the National Wildlife Refuge System as a separate agency within the U.S. Department of the Interior.

Ronald Fowler
Vice-President Communications
Blue Goose Alliance
bluegoosealliance@gmail.com