This proposal will maintain rangeland health and restore wildlife and riparian habitat

Feel free to use this guidance to help encourage BLM to properly analyze and study the proposal's impact on rangeland health and restoration of wildlife and riparian habitat. The most important point to make is that grasslands in central and northeast Montana evolved with the presence of bison and this proposal will restore a semblance of their historic and natural grazing patterns. Removing interior fences and allowing bison to graze naturally will help the BLM meet or exceed rangeland health standards, restore riparian areas, and improve wildlife habitat and migration.

BLM should analyze the benefits of the proposed bison grazing strategy on rangeland health

Plants and animals of the mixed-grass prairie co-evolved with bison for thousands of years. The transition back to bison offers an evolutionarily tested means to help the BLM meet and exceed the five standards for rangeland health in in the BLM's HiLine and draft Lewistown management plans, as well as manage for the 62 Species of Concern found in the region.

Bison are a foundation species and scientists have shown their presence increases habitat diversity for native plant and wildlife communities. Restoring their natural grazing patterns can help the BLM meet and exceed three standards specifically: Standard #1, uplands are in proper functioning condition; Standard #2, riparian and wetland areas are in proper functioning condition; and Standard #5, habitats are provided to maintain healthy, productive and diverse populations of native plant and animal species, including special status species.

This proposal will return grasslands to more natural conditions by replacing established rotational grazing practices of cattle with year-round continuous grazing of bison. Rotational grazing for cattle was intended to keep rangeland healthy by mimicking the natural bison grazing conditions that existed in the plains of eastern Montana. However, the conversion from cattle to bison grazing removes the need to use rotational grazing, if done on a sufficient scale and at an appropriate stocking level. APR has the experience, resources, and demonstrated ability to manage bison stocking rates and to move bison as needed for stocking rate control.

Scientists and managers have found that bison don't require rotational grazing to maintain rangeland health because they cover more ground and forage at far greater distances from water than cattle do. APR's primary goal is the provision of biodiversity and other ecosystem services for public benefit. As such, APR's grazing proposal for bison is similar to many other areas that are managed for biodiversity and public benefit and where there is year-round, continuous grazing by bison. Other examples of organizations implementing continuous bison grazing include national parks (e.g., Yellowstone N.P., Theodore Roosevelt N.P. in North Dakota, Badlands N.P. and Wind Cave N.P. in South Dakota), national wildlife refuges (e.g.,Wichita Mountains NWR in Oklahoma and Neal Smith NWR in Iowa), state parks and reserves (e.g., House Rock Wildlife Area in Arizona and Henry Mountains and Antelope Island in Utah) and nonprofit reserves (e.g., The Nature Conservancy's Tallgrass Prairie Reserve in Oklahoma and

Zapata Ranch in Colorado). Some of the bison in these examples graze on BLM-managed land. In the American Prairie Reserve region, the BLM has other large pastures with no interior fences that are managed by herding cattle to different parts of the property as needed. The natural movement habits of bison will eliminate or greatly reduce the need to herd bison. The BLM has also issued permits authorizing year-long grazing for cattle.

BLM should analyze the benefits to wildlife of the proposed fence removal and reconstruction

Included in the proposed action is the removal of hundreds of miles of interior fence. The removal of that fencing is crucial to the restoration of natural bison grazing patterns, and also will be beneficial to wildlife species that are negatively impacted by interior fencing. Extensive scientific research has documented that removing interior fences would mitigate significant impediments to wildlife movements and long-distance migration for pronghorn, bighorn sheep, mule deer and elk. Additionally, approval of the proposed action will upgrade perimeter fences to meet Montana Fish, Wildlife and Parks' wildlife-friendly fencing standards. This will have the net effect of dramatically improving wildlife movement within the region.

BLM should analyze the benefits of the proposal on sage grouse conservation

Restoring natural grazing patterns for bison is compatible with sage-grouse conservation on public lands. Studies show that over the long-term, bison's strong preference for grass forage may favor an increase, relative to cattle grazing, in forb diversity and abundance. This preference would benefit forb foragers such as greater sage-grouse. The bison's avoidance of woody riparian habitats, even during summer, is also compatible with maintaining sage-grouse habitat. Removing fence and reducing the risk of the often fatal grouse - fence collisions would further improve sage grouse habitat.

BLM should analyze the benefits of the proposed bison grazing on wetlands and riparian areas

Scientists and managers have demonstrated that high levels of cattle use can degrade riparian areas. Bison spend far less time and graze less frequently near water sources when compared to cattle, and thus are much less likely to cause degradation of riparian habitats. Prairie wetlands and riparian areas are important for several Montana Species of Concern, including ten species of fish and two species of amphibians. Bison wallowing also creates disturbed sites and temporary pools of standing water, which support a variety of wetland plant species and provides breeding habitat for the Spadefoot toad.