June 10, 2018

To Whom It May Concern:

Below are comments from American Prairie Reserve (APR) regarding our proposal to convert from cattle to bison grazing on 17 BLM allotments, to convert those same allotments and the Telegraph Creek Allotment to year-long, continuous grazing, and to remove interior fences on 18 allotments while reconstructing or constructing perimeter fences that meet wildlife friendly guidelines. In this proposed action APR is requesting to convert from cattle to bison 28,593 AUMs on 235,819 acres, which does not include the Box Elder, Telegraph Creek, or Dog Creek Allotments. While those previously named allotments are shown in the Proposed Action chart the conversion from cattle to bison has already been approved on the Box Elder and Telegraph Creek Allotments and was not requested on the Dog Creek Allotment.

We submit the APR Bison Management Plan (BMP) along with all references within for consideration in your analysis. The BMP provides extensive data on bison, including how their grazing behavior and physiology make them continuous grazers who, at appropriate stocking levels, maintain or even improve soil, water, and rangeland health. The BMP also provides extensive data indicating that traditional livestock species can maintain rangeland health using continuous grazing, at low to moderate stocking rates. The BMP cites studies regarding positive impacts on the environment resulting from bison grazing and discusses bison interactions with cattle. Within the BMP you will also find numerous studies portraying the benefits of removing fences. Lastly, you will find information on the positive economic and social impacts APR has and will continue to have in the region. Because this document is designed to be printed as a booklet some maps and charts will be split into two pages. The BMP is still undergoing its final review so future edits are a possibility.

Within the proposed action APR proposes stocking rates that maintain BLM permitted and State DNRC leased animal unit months. When compared to AUM calculations with the NRCS method the BLM permitted and State leased stocking rates ranged from less than below normal moisture to less than normal moisture. In the proposed action APR committed to maintaining a below normal moisture stocking rate on our deeded land (Appendix 3 of BMP and APR Proposed Action).

It is important to note that APR is not seeking preferential treatment - but rather equal treatment in your Agency’s analysis of the Proposed Action. Department of the Interior Bureau of Land Management 43 CFR Part 4100, Grazing Administration—Exclusive of Alaska, Sec. 4110.1 Mandatory Qualifications states,
“(a) Except as provided under 4110.1-1 (Acquired Lands), 4130.5 (Free Use Grazing) and 4130.6-3 (Crossing Permits), to qualify for grazing use on the public lands an applicant must own or control land or water base property, and must be:

1. A citizen of the United States or have properly filed a valid declaration of intention to become a citizen or a valid petition for naturalization; or
2. A group or association authorized to conduct business in the State in which the grazing use is sought, all members of which are qualified under paragraph (a) of this section; or
3. A corporation authorized to conduct business in the State in which the grazing use is sought.”

APR is a registered 501(c)(3) nonprofit corporation in the State of Montana, the state in which the allotments associated with APR’s proposed action are located. APR acquired the priority grazing leases in the proposed action by purchasing the base property from previous cattle ranchers in a willing seller – willing buyer and free market transaction. APR paid the sellers for the grazing leases, because they are assigned a value in the property appraisal. APR understands this does not guarantee the leases will be reassigned to them or modified to the use APR proposes. However, as long as APR remains a lessee in good standing and meets the terms and conditions of the permit BLM has a legal obligation to consider the merits and environmental benefits and effects of APR’s proposed action.

As can be seen in DOI BLM 43 CFR Part 4100, Grazing Administration--Exclusive of Alaska, Sec. 4110.1 Mandatory qualifications, BLM priority grazing privileges are not awarded based on the net value of base property owner, how the base property owner acquired their funds, type of livestock, stated purpose of the base property owner, which State the base property owner was born in or grew up in, or the base property owner’s social standing in the community. Nor should it be. It is the best interest of all, including the taxpayer, all citizens – the public land owners, and all livestock owners, that the BLM priority grazing privilege process be managed fairly and consistently for all parties, irrespective of these other unrelated factors that consistently find their way into the discussions regarding APR’s bison grazing proposal. APR has been and will continue to be held to the same required BLM standards and guidelines as other permittees regardless of their type of livestock, season of use, or grazing system.

APR believes there is value in transparency and public input in this process and understands the BLM scoping meetings were a response to local interest. There is however some question why other permittees and grazing permit decisions are not held to the same standard.
• *Montana Untamed,* “BLM to examine bison group’s request for more public land in northeastern”
• *Great Falls Tribune,* “Montana’s Prairie Reserve seeks to expand bison grazing”
• *The Glasgow Courier,* “BLM District Manager Answers Questions on APR Request”

As with other grazing proposals the BLM has been through this process with APR bison grazing proposals before and is well versed in most of the issues and information related to it. Given this, there is some question whether the public scoping meetings or extended scoping period resulted in any additional substantive issues or new information being identified. Other permittees should be aware that any standard or precedent set for APR, whether in NEPA or grazing stipulations, could just as easily become the standard for all livestock permittees.

APR operates in a willing seller – willing buyer and free market system. APR has no power or authority to force others to sell them land. Each person who sold land to APR did so of their own volition and for their own reasons. Often the land APR purchased was available on the open market. There is no indication that APR has a monopoly in the local land market. Since APR’s inception in 2001 several local land parcels that were of interest to APR have sold to others who were in the agriculture business.

Contrary to speculation, APR did not acquire the base property and priority grazing privileges by paying an exorbitant price. APR purchases are informed by values arrived at through licensed appraisers in the area. *2017 USDA Land Values Summary* show a steady annual increase in pasture and agriculture land values in the USA and in MT. There is no data to indicate pasture and agriculture land values in the APR region have exceeded those occurring in the State of MT or in the USA.

APR is funded by private donors, who receive tax reductions as a result of their donations, and some of our opponents believe this gives APR an unfair advantage in acquiring base property and associated priority grazing privileges. Again, net value of the base property owner or how they acquire their funds are not factors in the BLM priority grazing privilege process, which is apparent in the number of BLM grazing leases held by wealthy landowners and large corporate operations in MT and in the USA.

APR respectfully requests you analyze and address the effects of the APR proposed action on the following listed Benefits and the Public Perceived Issues APR is aware of, as listed below. Please consider the information provided in the *BMP*, in these comments, and the references cited in both in relation to the listed Benefits and Public Perceived Issues. Sources cited in these comments can be
1. **Benefits:**
   1.a. Healthy and Preserved Fully Functional Grassland Ecosystem
       (Vegetation, Riparian, and Soil)
   1.b. Healthy and Preserved Habitat and Populations of Grassland Native Species
   1.c. Restoration of Bison – the National Mammal and an American Icon
   1.d. Local Economy Diversification
   1.e. Increased Public Multiple Use of Their Public Lands
   1.f. Proposed Action Helps Meet DOI Special Orders Related to Wildlife Migration and Hunting and Fishing Access

2. **Public Perceived Issues:**
   2.a. Negative Impacts to Rangelands and Riparian Areas Because of Year-Round Grazing
   2.b. Need Cross Fencing to Maintain Rangeland Health
   2.c. Rangeland and Riparian Health Monitoring
   2.d. Disproportionately High Bison Grazing on Public Land
   2.e. Loss of Taxpayer Funded Fencing Investment Made in Cross Fences
   2.f. Cost of Removing Interior Fences and Reconstruction of Exterior Fences
   2.g. Who Pays to Replace Fences if APR No Longer Has Grazing Allotments
   2.h. Loss of Public/Private Land Boundaries by Removing Fences
   2.i. Fences in Special Designated Areas Such as WSAs and Wild and Scenic Corridors
   2.j. Changes in Wildlife Movement Corridors and Loss of Public Access Because of Electric Fences
   2.k. Impacts to Spring Bird Ground Nests, Especially Sage Grouse
   2.l. Impacts to Big Game Winter Range With Bison Grazing in Winter
   2.m. Loss in Agriculture Benefits to Economy
   2.n. Loss of People in the Area
   2.o. Loss of Food Source for People
   2.p. Disease Introduction to Cattle by Bison
   2.q. Lack of Ability to Keep Bison on Their Assigned Pastures and Damage to Neighbors Property and Livestock by Escaped Bison
   2.r. Lack of ID on Bison
   2.s. Shift in Local Social System
   2.t. APR is Receiving Preferential Treatment No Other Livestock Operator Would
   2.u. Safety Risks Associated with Bison and Liability Associated With Those Risks
2.v. NEPA Analysis Needs an Environmental Impact Statement Instead of an Environmental Analysis
2.w. This Analysis and Process Is a Waste of Taxpayer and BLM Funds
2.x. Public Access to Public Land and Access for BLM Administration of Grazing Standards and Guidelines on All Lands
2.y. Local Residents Should Have the Most Influence on BLM Decisions for Local Areas
2.z. APR is Coming in and Telling Long Time Locals What to Do
2.a.a. Proposed Action Shared Incorrect Information About Allotment Run in Common and Provides APR Too Many AUMs From That Allotment
2.a.b. APR Is a Cover to Acquire Oil, Gas, and Minerals Rights
2.a.c. APR is Funded by Foreigners
2.a.d. APR Past Grazing Leases to Others Indicate a Loss of Control of Their Base Property and Invalidates Their Claim to the BLM Grazing Permits
2.a.e. Under the Taylor Grazing Act Bison Are Not Livestock and It is Not Legal for Them to Be Authorized to Graze BLM Allotments
2.a.f. APR is Using Its Grazing Allotments to Provide Guest Services and Is Not Authorized or Paying to Do So
2.a.g. APR Must Comply With County Bison Ordinances
2.a.h. APR Built Fence Without BLM Approval or NEPA
2.a.i. APR is Removing Water Developments and Will Not Provide Adequate Water for Their Bison and Thereby is Reducing the Potential For Future Users of the Grazing Allotments and For Wildlife
2.a.j. APR Has No Management Plan and Doesn’t Manage Their Bison
2.a.k. APR Wants to Convert Their Bison to Free-Roaming Wildlife
2.a.l. APR Wants to Reintroduce Wolves and Grizzly Bears to the Region
2.a.m. APR Doesn’t Feed Their Bison in the Winter
2.a.n. APR Might Support Public Access and Hunting Now But There is No Guarantee They Will in the Future
2.a.o. APR is Withdrawing Land From the State FWP Block Management Program
2.a.p. APR Needs to Comply With the MTFWP Conservation Easements on It’s Burnt Lodge and Timber Creek Units

Lastly, there has been a call to analyze APR’s future vision. This NEPA analysis must focus on the Proposed Action rather than some speculative future scenario. As APR acquires future land parcels and the associated BLM and State grazing leases a similar analysis would need to be completed before the class of livestock, grazing season, and grazing systems could be altered.

1. **Benefits**
1.a. Healthy and Preserved Fully Functional Grassland Ecosystem (Vegetation, Riparian, and Soil)
See BMP sections 2a, 2b, 3a-c, 4, and Rationale, Progress to Date, and Strategies and Actions for Goals 1, 2, and 4-10.

The BLM would not be setting a precedent with the implementation of the APR Proposed Action.

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: 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 of 20,000 acres or more with no interior fences, similar to most of the pasture sizes APR is proposing. Examples include the Antelope Creek and Carpenter Creek Allotments. Those large pastures are managed, at least in part, by herding cattle to different parts of the pasture as needed. The natural movement habits of bison will eliminate or greatly reduce the need to herd bison.

The BLM has issued permits authorizing year-long grazing for cattle, some in Phillips County. The BLM RAS Permit Schedule Information Report lists thousands of active permits with year-round grazing seasons of 3/1-2/28 for both cattle and sheep. RAS lists thirty-six permits in AZ, ID, NM, NV, and WY authorized for 1,000 cattle or more with a year-round grazing season of 3/1-2/28, see the RAS Permit Scheduled Information Report - Sorted.

In addition, according to BLM information provided early in 2018 the BLM has issued 41 bison grazing permits, 2 of them to APR, in Montana, South Dakota, Colorado, New Mexico, and Wyoming. Most of these include year-long grazing, although according to BLM they also include a rotation or rest-rotation system (see Bison National Stats 03_23_18 _Info Request provided by the BLM.)

Moreover, bison grazed by APR do not have equivalent impacts on rangelands as cattle for other reasons. An AUM was originally defined as a 1,000-pound cow with a suckling calf by her side for a portion of the year. As per Berger and Peacock average weights for non-inbred bison from Badlands N.P. show males
weighted 615 kg (1,356 lbs) and females weighted 410 kg (904 lbs). Inbred animals weighed less. Craine reviewed bison weights across a spectrum of sites, from cool and moist (produces heavier bison) to hot and dry (much lighter bison). Average across all sites (which may be roughly where APR fits in, or APR may even be more toward hotter and drier end of range) found males weighted 736 kg (1,623 lbs) and females weighted 448 kg (988 lbs). A quick search indicates that breeding beef cows average heavier than 1,000 pounds and heavier than the female bison weights (see 2016/03 Animal Science on Cattle Weights). Similarly, newborn bison calves generally weigh less than newborn beef cattle calves. Therefore, while the NRCS, BLM, and APR’s proposed action count cow bison with a calf as an AUM, they likely require less forage than a beef cow with a calf AUM.

Dormant season grazing may reduce fuels and reduce wildfire ignitions and severity, see Dormant Season Grazing as Fuel Reduction 2015.

APR has the necessary staff resources and expertise to manage bison and ensure grassland, soil, and riparian health. APR employees living and working on the Reserve hold doctorate, master, and bachelor degrees and have experience in Range and Forage Sciences, Biology, Natural Resource Sciences, Rangeland Systems, and Fisheries and Wildlife. Living and working on the Reserve are APR employees who are known international bison management experts. APR also employs full-time employees with a doctorate degree in Wildlife Biology and others with various degrees and experience in Biology, Resource Conservation, Business, Accounting, History, Politics, Law, Psychology, Environmental Policy and Ethics, Creative Writing, Philosophy, Political Science, Modern Language and Literature, Marketing, Public Relations, Advertising, Cadastral Surveying, American Studies, Environmental Education, Public Policy, Environmental Studies, Geology, Fisheries and Allied Aquacultures, Wildlife and Fisheries Sciences, Education, and Media Studies. Employees also have experience in public land and park management.

APR is advised and supported by a host of expert and experienced natural resources specialists and partners. APR has and will continue working with other respected and experienced scientists and organizations to continue to grow the body of research and knowledge related to grasslands and their native species so as to inform APR’s management practices.

APR must meet the same rangeland health conditions on their allotments as any other BLM lessee. To date they have been successful in doing so with bison year-long continuous grazing and are lessees in good standing. When BLM land and APR deeded property are one pasture APR will, at minimum, meet the BLM rangeland health standards and guidelines on their deeded property as well. BLM surveys of APR Grazing Allotments in 2016 indicate APR is meeting
on all their grazing allotments Rangeland Health Standard #1 - Uplands Are In Properly Functioning Condition, Rangeland Health Standard #4 - Air Quality Meets Montana State Standards, and Rangeland Health Standard #5 - Habitats are Provided for Healthy, Productive, and Diverse Populations of Native Plant and Animal Species Including Special Status Species. This same report indicates on APR grazing allotments for Range Health Standard #2 - Riparian and Wetlands are in Properly Functioning Condition 4 of the 9 reaches surveyed were in Properly Functioning Condition and 5 of the 9 reaches surveyed were Functional At Risk With an Upward Trend, showing improvements under APR management. The Range Health Standard #3 - Water Quality Meets Montana State Standards on APR grazing allotments is met on 3 of the 9 reaches surveyed, not met on 2 of the 9 reaches surveyed, or is unknown on 4 of the 9 reaches surveyed. On the two reaches where Standard #3 is not met it is because of factors outside of APR’s control, such as heavy metal or phosphorus levels.

Unlike commercial operations, APR is not managing its bison herd to maximize profits. In the Proposed Action APR voluntarily proposed to stock their deeded land at below normal moisture stocking rates, when normal moisture stocking rates would have resulted in 8,454 more AUMs, equating to 704 more animals. Scientists and managers have found that bison at low to moderate stocking rates 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. Averaged over all the property units, APR’s proposed stocking rate would allow 81.3 acres per animal unit per year.

APR has proven its ability to manage herd size in the last couple of years, with bison moves and employee and public harvesting, as documented in the BMP and these comments. If drought, fire, or other situations demand adjustments to the bison’s pasture, APR has all the necessary financial and physical resources to construct temporary or permanent fencing for the protection of grassland, soil, and riparian resources. APR also has the resources to develop additional water sources such as wells and to feed bison as needed. APR has and will use, as necessary, the same tools as the neighboring cattle ranchers to manage the bison herd size plus harvesting and contraception. Like all livestock owners, APR is subject to the State drought management rules. APR has developed emergency contingency plans for bison management in the case of fire, drought, etc. (see Appendix 2 of the BMP.)

APR can and will agree to adjusted AUM numbers and stocking as needed for drought, flood, and loss of forage because of increases in wildlife grazers such as prairie dogs, elk, etc.

On June 23-25, 2011, the American Prairie Reserve held their first BioBlitz. In just 24 hours a list of 550 species was created by approximately 70 scientists, college
students, citizen scientists, and volunteers. The number of documented species was only limited by the number of taxonomic experts we could get to join this project in such a remote location. The species list will serve as a benchmark of the biodiversity in the early years on the Reserve.

In 2009 APR was the site of a bird survey funded by World Wildlife Fund and conducted by Wild Things Unlimited. Surveyors assessed the number of different species types, the number of individuals within each species and species distribution throughout the area’s grasslands, sagebrush communities, prairie dog towns and wetlands in 2005 and 2009.

In 2009 the Wildlife Conservation Society surveyed sites with different grazing practices to better understand the relationships between grazing, habitat structure, and habitat use by grassland birds. The study included Reserve lands as well as sites on private ranches and lands owned by The Nature Conservancy and Nature Conservancy Canada.

Fish surveys were conducted in the Telegraph Creek basin in 2006, 2008, 2011, and 2012. Water levels varied widely during these times and dam removals also occurred in 2007. The latest report from Kayhan Ostvar of Rocky Mountain College examines how the removal of fish barriers and the new connectivity to Fort Peck Reservoir, which is stocked with nonnative fishes, may have impacted the distribution and species composition of the Telegraph Creek. A fish inventory of a portion of Beaver Creek was completed by MTFWP in 2017.

In 2005, World Wildlife Fund’s Northern Great Plains Program examined historic occupation by beaver in the project areas, assessed the hydrological and biological impacts of beaver activity in prairie streams, and summarized beaver restoration techniques in similar environments. The report suggests that the presence of beaver in the region would provide significant benefits to riparian corridors, water levels, and related animals.

Additional related research can be found at https://www.americanprairie.org/project/research-and-reports.

Following is a list of researchers and work that is scheduled to occur on the Reserve in the next three years. In addition to providing increased knowledge of grasslands. These researches will depend on the local communities for goods and services while at the Reserve, thus providing economic benefits to many nearby businesses.

- Colleen Crill, APR swift fox restoration biologist, Swift Fox Reintroduction Plan.
• **Justin Cooper**, Graduate Student, Smithsonian Institute for Conservation Biology -- Conducting initial information gathering for Smithsonian Post Doctoral Fellows until May, 2018.

• **Andy Boyce**, Post Doctoral Fellow, APR/Smithsonian Conservation Biology Institute -- Researching biodiversity trends (breeding birds, small mammals, vegetation) related to the Freese scale and grazing practice (i.e., bison vs. cattle vs. nothing) for the next three years.

• **Hila Shamoon**, Post Doctoral Fellow, APR/Smithsonian Institute for Conservation Biology -- Researching prairie dogs in APR region and the feasibility of a black footed ferret reintroduction for the next three years.

• **Graduate Student (To Be Determined)**, APR/Clemson University -- following-up on previous research about bison vs. cattle grazing in APR region for the next one-three years.

• **Noelle Guernsey and Others**, Prairie Dog Coalition -- Assisting APR with plague mitigation efforts on prairie dog towns.

• **Technicians (To Be Determined)**, APR/Smithsonian/Clemson - post doctorates and the graduate student will have 1 - 2 technicians helping them conduct field work on a year-to-year basis.

• **Visiting Researchers**, multiple -- e.g., Curt Freese, Steve Forest, David Jachowski, Dustin Ranglack, etc.

1.b. Healthy and Preserved Habitat and Populations of Grassland Native Species

See BMP sections 2a, 2b, 3a-c, 4, and Rationale, Progress to Date, and Strategies and Actions for Goals 1, 2, and 4-10.

See also [Preserving Pollinators, Studying the Bee Communities of Nachusa Grasslands The Nature Conservancy and Griffin et al.-2017-Restoration_Ecology](#) regarding benefits of prairie restoration for bees.

1.c. Restoration of Bison – the National Mammal an American Icon

See BMP sections 2a, 2b, 3a-c, 4, and Rationale, Progress to Date, and Strategies and Actions for Goals 1, 2, and 4-10

Although the Plains bison was recently declared the national mammal, there are only 20,000 bison spread across 55 conservation herds in the country. Plains bison are listed as a Species of Greatest Conservation Need by the state of Montana. The International Union for Conservation of Nature (IUCN) lists the
American bison as “near threatened.” Most of the existing conservation herds contain fewer than 400 bison, which makes the genetic conservation of the species a national priority.

The American Prairie Reserve bison herd is one of only a handful in North America that shows no signs of cattle genes. This proposal will allow the herd to continue to grow and provide a stock of genetically pure bison to establish and enhance the genetic health of other federal, state, and tribal herds. APR has demonstrated the talent, resources, and willingness to help make the restoration of our nation’s mammal a stunning success. APR has already contributed to bison restoration elsewhere by donating animals to several federal and state agencies, including Fort Niobrara National Wildlife Refuge in Nebraska, Rocky Mountain Arsenal National Wildlife Refuge in Colorado, USDA-APHIS National Wildlife Research Center at Colorado State University, Smithsonian’s National Zoo in Washington, D.C. (for public education purposes), and Arizona Game and Fish Department for the House Rock Wildlife Area. Through the approval of the proposed action, the gradual growth of the American Prairie Reserve bison herd will ensure close collaboration with managers of other conservation herds in North America, and will support the development of multiple herds that, collectively, will help restore and maintain the genetic variation and integrity of the national mammal.

Under coordination by the Inter-tribal Buffalo Council (ITBC), bison restoration is a priority for cultural, spiritual, ecological, and economic purposes on Indian lands. Toward this purpose, the Reserve has already donated bison to the ITBC, who distributed these bison to four different members. Most recently, in January 2018, American Prairie Reserve donated 30 bison each to the Fort Belknap, Fort Peck, and Blackfeet Indian Reservations in Montana, and 25 bison to Pe’ Sla in South Dakota. This collaboration is certain to increase. This is particularly relevant to the Fort Belknap Indian Community, who are the Reserve’s closest neighbors, and who passed a resolution and wrote the BLM a letter supporting APR’s bison grazing proposal. The return of bison to the region is a common goal and vision shared with tribal elders, the tribal council, wildlife managers, and spiritual leaders. BLM should consider that this important collaboration would continue to grow as a result of the proposal.


1.d. Economic Diversification
See Goal 11 Rationale, Progress to Date, and Strategy and Actions in the BMP.
The grazing receipts collected by the BLM and State for the leased AUMs would not change under the APR proposal. Per capita fees to the State would increase with the proposal because the annual fee for bison is almost three times per animal what it is for cattle. APR property taxes for land, vehicles, and equipment are calculated the same as for others in the county and would not change with the APR proposal. Bed taxes will increase as APR continues to develop additional lodging and camping opportunities for guests.

Livestock production benefits to the local economy have been declining for decades, well before the inception of APR. In an analysis using the Headwaters Montana Economic Profile System, the Agriculture PA Affected County report indicates in the five affected counties from 1970 to 2016 cash receipts from livestock and products shrank from $301.6 million to $173.4 million, a 42.5% decrease. Net income including corporate farms shrank from $267.4 million to -$11.3 million, a 104.2 percent decrease.

USDA NASS Quick Stat Reports for All Cattle and Calves For Each County From 1940-2017 indicate the number of cattle including calves in the five affected counties peaked in the early to mid 1970’s as follows and started declining after that, again well before the inception of APR.

- **Chouteau** - 75,000 animals in 1971 compared to 37,500 in 2017, a 50% reduction and an average of a 10.9% decline per decade
- **Fergus** - 138,200 animals in 1975 compared to 99,000 in 2017, a 28% reduction and an average of 6.7% decline per decade
- **Petroleum** - 41,600 animals in 1975 compared to 33,000 in 2017, a 21% reduction and an average of 5% decline per decade
- **Phillips** - 102,200 animals in 1974 compared to 86,000 in 2017, a 16% reduction and an average of 3.7% decline per decade
- **Valley** - 99,500 animals in 1974 compared to 66,000 in 2017, a 34% reduction and an average of 7.9% decline per decade

The proposed action will have little influence on long-term economic and demographic trends that already have and will likely continue to impact the agricultural economy in the five affected counties. There is nothing to indicate similar declines associated with cattle will not continue in the future, see USDA 20th Century Transformation of U.S. Agriculture and Farm Policy and Karin-Bendz A Retrospective on US AG and Farm Policy. These figures indicate that diversifying the economy in these counties could be a positive economic step. With that said, agriculture has been and will continue to be the primary contributor to the economy in northeast Montana.

APR’s inception was in 2001, and we bought our first parcel of land in 2004 – in Phillips County, acquired our first bison in 2005 – 16 animals pastured in Phillips
County, and to date have replaced cattle with bison in Phillips County on APR’s 27,585-acre Sun Prairie Unit, 3,900 acres of deeded land on the Sun Prairie North Unit, 5,900 acres of deeded land on the Dry Fork Unit, and 7,350 acres of deeded land on the White Rock Unit, with approximately 850 bison total in 2017. Yet, as per the USDA reports in 2005, the year APR first acquired bison, there were 66,000 cattle in Phillips County and in 2017 there were 86,000, a 23% increase.

As per the USDA NASS Quick Stats, in 2017 in the five counties affected by APR’s proposal (Chouteau, Fergus, Petroleum, Phillips, and Valley), there were a reported 321,500 cattle. Since 2001, the year of APR’s inception, the annual change in cattle numbers in these five counties combined has ranged from -4.1% to +6.5%. But, as demonstrated in the paragraph above regarding Phillips County, any negative effects to cattle numbers were not a result of APR bison but rather ongoing influences such as market conditions, weather, and rancher preferences, unrelated to APR.

Transitioning 17 BLM grazing allotments and 18 State grazing leases from cattle to bison over the next ten years would affect less than 29,000 leased public Animal Unit Months (AUMs), less than 5% of the public leased AUMs in the five affected counties, less than 7% of the BLM and State Trust Lands in those counties, and less than 2% of all the land in those counties (2013 MT Public Land Management Study by County, 2018-02-21 State AUMs By County From Clive Rooney, and 2018-03-28 Permitted AUMs by County From BLM). That acreage would only feed a small percentage of total cattle in the region – less than 2,500 cows for a year with a suckling calf by their side for a portion of the year or less than 5,000 cows for six months with a suckling calf by their side. Assuming the latter, a total of 10,000 cattle including calves could be transitioned to bison on these public lands over the next decade. This equates to 3.1% decline of the 321,500 cattle and calves in the five affected counties in 2017. This is less than the per decade average declines from 1970’s-2017, shown above. These losses will also be offset by the increased APR expenditures, APR employment opportunities, and APR related tourism and recreation a diversified economy can provide.

As per National Public Radio: “National Parks Buoy Economies” in 2017 National Parks pumped 36 billion dollars into the national economy, with the largest benefactors being communities close to the parks. Montana parks generated $556 million in visitor spending and supported 9,130 jobs. Almost annually Yellowstone and Glacier National Parks are setting new visitation records and overcrowding is becoming an issue, see Park Overcrowding. APR and CMR combined have the potential to provide an alternative for park visitors in Montana, reducing overcrowding in the existing parks and increasing visitation to the APR region, see NWF Bison FINAL.
The following sources demonstrate the economic value of protected landscapes, wildlife, and outdoor recreation and some sources demonstrate the public support for maintaining these resources: Montana Economy Report; West is Best Full Report by Headwaters Economics; 2016 BLM Quiet Recreation on BLM Managed Lands; 2016/03 National Quiet Recreation; 2016/03 MT Quiet Recreation; 2000 Population Growth, Economic Security, and Cultural Change in Wilderness Counties by Lorah; Environmental Protection, Population Change, and Economic Development in the Western United States by Lorah; 2016 MT Economic Review; 2018 Reports (Conservation, Economic, Sportsmen, National Monuments, Rural Voters); 2018 Western States Survey; Preliminary 2016 Non-Resident Traveler; MT FWP Hunters Numbers; 2012 Federal Outdoor Recreation Trends; 2014-10 Federal Recreation Trends; OIA MT Recreation Economy; USFWS Land Trust Alliance Economic Benefits Brochure; and This Land Was Built For Bison.

APR also directly contributes to the local economy through the purchase of goods and services and job creation. From 2015-2017 APR spent an annual average of $1.9M in the seven-county project area. Since March, 2013 APR has purchased seven new pickups from dealers in the project area. In 2017 alone, APR spent over $40,000 at Ezzie’s in Malta for propane, bulk fuel, and other supplies, over $35,000 at CHS in Malta for fencing materials and other supplies, and over $15,000 at Hardware Hank’s in Malta for supplies.

1.e. Increased Public Multiple Use of Their Public Lands
See Goal 11 Rationale, Progress to Date, and Strategies and Actions in the BMP.

APR is developing facilities to help the public visit and enjoy their public lands. APR has developed one campground and is in the process of developing another campground with rental cabins and a Welcome Center. APR is also developing a system of rental yurts/cabins along the full length of Reserve, enabling visitors to hike, bike, paddle, or horseback ride along a route covering the entire 200 miles. APR is in the process of developing a National Visitor Center in the community of Lewistown.

APR hosts a variety of visitors and events further encouraging public use and enjoyment of public lands in the area. Bison and the increased wildlife populations APR supports provide yet another reason for the public to visit their public lands.

APR is well suited to partner with the BLM and others in developing and maintaining the Lewis and Clark National Historic Trail, Nez Perce National Historic Trail, recreation use in the Upper Missouri River Breaks National Monument, public access to public land, historic interpretation for the area, and paleontology. APR is also a partner interested in maintaining the intrinsic values
of Wilderness Areas, Wilderness Study Areas, Wild and Scenic River corridors, the Upper Missouri River Breaks National Monument, and cultural sites.

Further, as the Reserve’s population of native bison continues to grow as a result of this proposal, managers will increasingly use harvest as a bison management tool to replicate natural predation. In 2018, the Reserve offered its first public bison harvests. Four bison harvests were awarded to residents of the APR project area and two were offered in an auction open to the general public. All hunters successfully harvested bison and all hunters resided in Montana. Two additional bison harvests were donated to another local non-profit organization as a fundraising tool but those hunts have not yet occurred. Read more about the 2018 bison harvest at https://www.americanprairie.org/bison-harvest and web links that can be accessed through this webpage.

The proposed action would enhance public hunting opportunities by restoring wildlife habitat and improving wildlife movement through removal of interior fences on public lands. Additionally, bison and biodiversity-focused management on the Reserve will result in a greater abundance of ungulates overall. Restoring wildlife habitat through this proposed action will benefit the health of regional wildlife populations and gradually allow the Reserve to provide a richer and more satisfying public hunting experience in coming years.

The Reserve is already partnering with the public and state of Montana to offer public wildlife hunting opportunities. In 2017, the Reserve enrolled over 22,000 deeded acres in Montana Fish, Wildlife, & Parks Block Management program. The Reserve provided 4,159 hunter days in 2017 through this program and an additional 259 hunter days through other managed hunts on Reserve properties. See https://www.americanprairie.org/hunting for information on the 2017 hunting rules associated with APR deeded property not enrolled in Block Management. Hunting opportunities for wildlife on the Reserve will continue to expand as a result of this proposal.

The proposed action is fully consistent with the American Prairie Reserve long-term goals of improving access to public lands. Access to quality wildlife habitat remains one of the most significant factors impacting hunting and fishing participation throughout the country. The Reserve’s network of private land holdings are already open to the public for visitation and recreation. In addition, some of the private lands owned by American Prairie Reserve no longer block access to adjacent federal and state lands, which was not always the case with previous owners. This is an important public benefit that should be taken into consideration.

1.f. Proposed Action Helps Meet DOI Special Orders Related to Wildlife Migration and Hunting and Fishing Access
APR proposal will advance Secretarial Order #3362. Montana is one of several priority states listed in the recent Secretarial order #3362 Improving Habitat Quality in Western Big-Game Winter Range and Migration Corridors. Implementation of this proposal is a specific action that BLM can take to help achieve order #3362. The order tasks DOI with evaluating site-specific management activities that ‘conserve or restore habitat necessary to sustain local and regional big-game population.’ It also specifically instructs managers to work with private landowners to ‘achieve permissive fencing measures, including potentially modifying (via smooth wire), removing (if no longer necessary), or seasonally adapting (seasonal lay down) fencing if proven to impede movement of big game through migration corridors.’ Enhancing big-game migration corridor habitat on Federal lands by removing interior fencing fits within the scope of this proposal and the Reserve’s long-term goals. The current proposal envisions removal of hundreds of miles of interior fence that negatively impact wildlife species, in addition to upgrading perimeter fences to meet Montana Fish, Wildlife and Parks’ wildlife-friendly fencing standards. See BMP Goal 4 Rationale for references regarding fence impacts to wildlife. This proposal is thus highly relevant to help DOI ensure adequate wildlife movements and long-distance migration for pronghorn, bighorn sheep, mule deer and elk in Montana.

APR proposal is consistent with Secretarial Orders #3356 and #3347. Secretarial Orders #3356, Hunting, Fishing, Recreational Shooting, and Wildlife Conservation Opportunities and Coordination with States, Tribes, and Territories, and #3347, Conservation Stewards and Outdoor Recreation, both of which seek to expand access for recreational hunting and fishing on public lands, and improve hunting opportunities by restoring habitat for fish and wildlife. Specifically, the agency is charged with identifying opportunities to help provide voluntary public access through private lands and waters for hunting and fishing, and to coordinate with state, tribal, and territorial wildlife management agencies to identify opportunities for increased access to Department lands and waters, including identifying opportunities for access through adjacent private lands. Although this proposal does not directly address public lands access, it is consistent with the Reserve’s long-term goals of improving access to public lands. The Reserve’s network of private land holdings are already open to the public for visitation and recreation. In addition, in some cases the private lands owned by the Reserve no longer block access to adjacent federal and state lands, which was not always the case with some previous owners. The proposed action would help to enhance public hunting and harvest opportunities by restoring wildlife habitat and improving wildlife movement through removal of interior fences on public lands. Replacing cattle with bison and implementing our Freese scale management approach will yield much greater abundance of ungulates. Restoring wildlife habitat through this proposed action will benefit the health of regional wildlife populations and gradually allow the Reserve to provide a richer
and more satisfying public hunting experience in coming years. Public bison harvest opportunities were offered by American Prairie Reserve for the first time in 2018, and will continue to grow with the expansion of the bison herd, further increasing and improving hunting opportunities.

APR’s proposal can meet and exceed rangeland health standards Independent of recent secretarial orders, this proposal can 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 (see the 3c of BMP.) 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.

The Department of Interior in their Bison Conservation Initiative of 2008 identified the value of bison conservation when it stated:

One of the iconic symbols of American frontier expansion is the image of vast herds of North American bison (Bison bison) grazing on the western plains. While the days of millions of free-roaming bison are gone, it may be possible to develop partnership arrangements that will permit bison herds to recreate their natural role in areas where biologically suitable and socially acceptable.

In appropriate areas, the presence of bison in adequate numbers may help support the restoration or maintenance of other native species and habitats. This in turn would provide inspiration or enjoyment to diverse elements of our society. As demonstrated convincingly at Yellowstone National Park, observing bison ranging freely over the landscape holds a major attraction for the American public.

APR can help with several Action Items of the bison conservation initiative by being a source bison herd, free of cattle genes and brucellosis, for the DOI, Tribes, and others and by being a collaborator in bison conservation. APR is investing their own resources towards bison conservation and helping grow the body of science regarding bison conservation. They have a proven track record of being able to successfully meet BLM grazing standards and guidelines while allowing bison to behave as naturally as possible on the grazing allotments.

2. Public Perceived Issues:
2.a. Negative Impacts to Rangelands and Riparian Areas Because of Year-Round Grazing
See APR NEPA Comment 1.a. above.

There is a common belief that Ted Turner attempted to do what APR is proposing to do with bison but ended up putting the fences back in because of damage to the riparian areas. There are some significant differences between Turner’s operation and APR’s. Turner’s is a commercial operation and APR is not so as needed APR can and will reduce herd size and is not motivated to make a profit from the bison. In addition, it is our understanding that Turner put the fences back in to increase grazing harvest efficiency. Phillips 2000 indicates that managing bison as APR is proposing will result in habitat heterogeneity, similar to what APR wants to recreate. In this study, of the 45,138 acres of the Turner properties studied: 14% was overutilized, 11% was moderately utilized, and 75% was underutilized. The stocking rate was not discussed in the study. This study does discuss harvest efficiency and does not indicate overutilization in riparian areas but identifies bison preference for grazing in areas with larger visible areas and in areas that are well connected to adjacent areas. This description of the bison preferred areas for grazing often does not fit riparian areas where there is more vegetation such as trees and shrubs that limit visibility and connectivity to adjacent areas.

There is also speculation that bison typically had a north-south migration so they were not usually in the area of APR’s proposed action in the winter or early spring. Even if that were the case, which is well disputed and addressed in Where the Buffalo Roamed - Or Did They, the fact is that hundreds of thousands of cattle are in the area year-round now. In most operations the cattle are pastured during the winter and spring on small parcels of private land. That private land is often nearer to streams and rivers than the BLM managed land because land nearest water was most attractive to homesteaders. APR’s proposal has their livestock disbursed on larger parcels of land year-round, rather than concentrated near water courses during the winter and spring.

2.b. Need Cross Fencing to Maintain Rangeland Health
See APR NEPA Comment 1.a. above.

Some of this perceived concern was related to the increased habitat for cheatgrass if areas were overgrazed. APR stocking rates are in the low to moderate range to reduce the potential for overgrazing.

One of the reasons, that APR has chosen this region to work in is because of the intact native flora and fauna. APR is required by law to monitor and actively remove noxious weeds and has a weed management plan.
While cheatgrass invasion is a concern for grasslands management, most of the conversion of native, perennial grasslands to non-native, annual grasslands has occurred in the Great Basin and California. The plant communities west of the Rocky Mountains did not evolve with much grazing pressure, especially not bison. Most herbivory came from pronghorn, bighorn sheep, mule deer, jackrabbits, rodents, and insects (Mack and Thompson 1982; Knapp 1996). Instead of C₄ sodgrasses that can withstand heavy grazing pressure while protecting the soil, those plant communities in the west were made up of C₃ bunchgrasses with cryptogamic crusts in between the plants (Mack and Thompson 1982; Knapp 1996).

In the project area, there is both sodgrasses and bunchgrasses, which has prevented large-scale cheatgrass invasion into the area. Overgrazing can certainly promote cheatgrass invasion. APR will graze the land with a low stocking rate, according to NRCS recommendations, and will monitor grazing impacts.


2.c. Rangeland and Riparian Health Monitoring
See APR NEPA Comment 1.a. above.

APR would be glad to work with the BLM and other interested parties on a monitoring plan and to devote resources to monitoring.

2.d. Disproportionately High Bison Grazing on Public Land
This perceived concern is belied by available evidence. Dustin Ranglack conducted a review of APR bison grazing, based on GPS collar data on the Sun Prairie Unit, where year-round bison grazing was approved for a portion of the Unit in 2008 and implemented in 2009. The entire unit was approved for year-round bison grazing in 2014. Dustin studied the GPS collar data for May 1 to Oct 31 for the years 2009-2013 and May 1, 2014 – April 6, 2018. Dustin found collared bison spent 65% of the total duration time considered on APR deeded land, 29% on BLM managed land, and 6% on other land (state leases and other deeded within the pasture.) The Sun Prairie pasture acres are 32% APR deeded, 66% BLM, and 2% State.

2.e. Loss of Taxpayer Funded Financial Investment Made in Cross Fences
See APR NEPA Comment 2.f., 2.g., and 2.h. below.
Fences on grazing allotments are sometimes funded, in part, through BLM Range Improvement funds which are generated by grazing fees, not tax dollars. If the fences on APR grazing allotments were funded through Range Improvement funds, and there is no guarantee they were, many of these fences have been in place for decades, and their depreciated value are limited to non-existent. However, if BLM would like the salvaged material to use for other fencing jobs APR would be happy to facilitate transport of the materials to BLM. APR is providing new and improved perimeter fences entirely at their own cost.

The benefits to wildlife of reduced fencing are many and well documented. Since wildlife are a public resource improving their habitat is also a public benefit.

2.f. Cost of Removing Interior Fences and Reconstruction of Exterior Fences
APR provides all funding to remove interior fences and to reconstruction exterior fences to meet wildlife friendly guidelines. APR also performs all fence maintenance of the exterior fences for bison pastures, rather than expecting neighbors to contribute 50%, which is the standard practice in MT. APR has a crew dedicated to fence maintenance and keeps logs of all fence patrols and maintenance activities. While not always possible, the APR goal is to patrol the entire length of every bison pasture fence at least once per week. APR offers salvaged fencing materials free of charge to adjacent neighbors that may have contributed to the fence and also sells salvaged materials at a reasonable price, all so they are not wasted.

2.g. Who Pays to Replace Fences if APR No Longer Has Grazing Allotments
If, in the highly unlikely event APR decided to sell the land, the property buyer would be responsible for replacing fences. A potential buyer would need to base their purchase price offer on what they are receiving. They would need to take into account the lack of fences, any need to replace the fences, and reflect that in their purchase price. It is common for buyers to consider and base their purchase price offer on what future work will be needed when they make a property purchase, whether they are buying land, a home, or a business.

2.h. Loss of Public/Private Land Boundaries by Removing Fences
Fences do sometimes provide boundary information, although fencing located off land boundaries for better fence locations is a common practice in the area. It will be APR’s responsibility to ensure they do not take action on BLM land without prior approval, regardless of the fence location. APR deeded lands are open to public use. If a land boundary needs to be established for some reason BLM and APR would need to decide who is responsible for the associated cadastral survey and boundary marking. APR has the necessary resources to provide for cadastral surveys if they are needed.
2.i. Fences in Special Designated Areas Such as WSAs and Wild and Scenic Corridors
APR will gladly work with BLM and State to minimize or eliminate fences in specially designated areas such as Wilderness Study Areas, Wild and Scenic River Corridors, and the Upper Missouri River Breaks National Monument. If this means reduced pasture for bison APR will also agree to reduced AUMs and stocking on the affected properties. BLM, during the analysis please identify alternatives to accomplish this fence reduction and/or elimination.

2.j. Changes in Wildlife Movement Corridors and Loss of Public Access Because of Electric Fences
Electric fence is identified as wildlife friendly in MT FWP Wildlife Friendly Fences -2012 and NRCS Fencing With Wildlife in Mind. 2002.05 Final Report on Electric Fence and Big Game Movement and Livestock Containment by Karlu and Anderson and Wildlife Friendly Fence Dissertation_Final_Draft discuss the effectiveness of electric fence in containing livestock, including bison, and the permeability of electric fence by big game. Also see BMP Goal 4 Progress to Date and Appendix A and B of the Proposed Action.

As with fences used by past cattle ranch owners, APR provides and maintains either gates or auto gates at locations where roads intersect the fence. APR builds fences with the lowest wire designed to allow pronghorn to go under the fence so users of the public or deeded land can also go under the fence. If this is determined to be a significant issue APR is also willing to install and maintain, at reasonably distanced key locations, stiles or specialized gates that allow people but not bison to pass over or through the fence. Lastly, while there will be electric exterior fences to cross the proposal would reduce fences and the need for fence crossings in the interior of the APR land units.

BLM H-1741-1 Fencing Guidelines allow electric fencing on BLM allotments.

2.k. Impacts to Spring Bird Ground Nests, Especially Sage Grouse
2011 NRCS-sponsored reviews of effects of rotational and continuous grazing on wildlife did not report that nest trampling was a problem in either case, as cited in the BMP (Briske et al. 2011, Krausman et al. 2011).

Compared to highly productive grasslands where stocking densities are high and thus there is a greater chance for livestock to trample a nest, low stocking densities of western rangelands make this much less likely. Other factors, particularly nest predation, are much more important. https://www.researchgate.net/publication/261871376_A_Review_of_Nest_Trampling_by_Livestock_and_Implications_for_Nesting_Birds_on_Shrub-Grass_Rangelands_in_the_Western_States
Rotational—take half, leave half—grazing reduces the diversity of habitats for grasslands birds (lack of very short and very tall vegetation). This is likely one reason that populations of many grassland birds have declined. Moreover, fences needed for rotational grazing directly increase mortality of low-flying sage grouse because of collisions. Continuous grazing over large areas aims to increases habitat diversity.

Year-round continuous grazing by bison and ground-nesting grassland birds co-evolved and co-existed for thousands of years. There is no basis to conclude that restoration of more natural grazing conditions that are more consistent with these millennia-old conditions will increase impacts to ground-nesting birds.

Removing fences will improve habitat for grassland birds. Many grassland birds avoid nesting near novel vertical structures such as fences and shelterbelts or trees at the edges of stock ponds, and nest mortality is greater near such features because they attract predators and nest parasites (Freilich et al. 2003, Shaffer et al. 2003, Coppedge et al. 2008).

It is of interest to note that during the winter of 2017-2018 with it’s heavy snow it was common to observe grouse following bison to reach forage the bison had cleared of snow.

2.1. Impacts to Big Game Winter Range With Bison Grazing in Winter
See Goal 7 Rational in the BMP.

Krausman et al. (2011) reviewed the question regarding cattle and wild ungulates in his NRCS review:

An important point is APR is not changing the AUMs from what was permitted for cattle, just when those AUMs are being consumed. If rotational grazing means consuming all of the allowable forage during the growing season, and continuous means less intensive forage during the growing season so that it can extend into the winter, then more forage would remain during the winter for big game. As extensively reviewed in the BMP the results of the NRCS review (and others) indicate rotational grazing showed no benefit over continuous grazing in terms of forage production/availability.

During the winter of 2017-2018 with it’s heavy snow it was common to observe deer following bison trails through the snow to ease their travel and to reach forage the bison had cleared of snow.

Lewis and Clark journals indicate other wildlife species such as deer, pronghorn, elk, and Big Horn Sheep were seen grazing in large common herds with bison.
2.m. Loss in Agriculture Benefits to Economy
See APR NEPA Comment 1.d. above.

2.n. Loss of People in the Area
US Census data shows the population of the five affected counties has been declining since the 1920s, almost 20% from 1970-2016, well before the inception of APR. See Goal 11 Progress to Date in the BMP, Socioeconomic Summary PA Affected Counties, and County Populations. Most sellers who lived locally when they sold to APR still live locally and APR has brought new residents to the area through employment opportunities.

2.o. Loss of Food Source for People
The number of cattle transitioned to bison under this proposal is miniscule in the larger cattle production picture in the region and in the USA. According to About Public Lands Council only about 40% of cattle in the West and 19% of cattle in the USA graze public lands for a portion of the year.

As per a BLM brochure, the BLM has 155,000,000 acres authorized for grazing in 21,000 allotments authorizing 12,000,000 AUMs. APR’s proposed action would convert from cattle to bison on: 235,819 BLM acres or 0.15% of the total BLM acres authorized for grazing; 17 or 0.08% of the BLM grazing allotments; and 28,593 AUMs or 0.2% of the BLM authorized AUMs.

As per the Forest Service 2015 Grazing Statistical Summary pages 1 and 4, the Forest Service has 95,000,000 acres authorized for grazing with 8,324,625 AUMs authorized, not counting horses and burrows. APR’s proposed action does not affect any of the grazing authorized by the Forest Service.

Statistics for acres and AUMs of authorized grazing on Fish and Wildlife Service managed public lands were not readily available. APR’s proposed action does not affect any of the grazing authorized by the Fish and Wildlife Service.

Combined BLM and Forest Service authorize grazing on 250,000,000 acres for 20,324,625 AUMs. APR’s proposed conversion for cattle to bison affects 0.09% of the BLM and Forest Service public land acres authorized for grazing and 0.1% of the BLM and Forest Service public land AUMs authorized.

Since only 19% of the cattle in USA graze public lands, which includes not only BLM and Forest Service but also FWS. this means the proposed action would affect less than 0.1% of the 19% of USA cattle that graze public land or less than 0.0002% of USA cattle.
Furthermore, due to the price, beef is generally not available to the people in the world most at risk of suffering from hunger. Finally, bison harvesting—resulting in the harvested bison meat being consumed by people—is a population control method that the Reserve has begun to use with the intention of expanding over time, thus providing a meat source for people.

2.p. Disease Introduction to Cattle by Bison
See Goal 7 Objective, Rationale, and Progress to Date in BMP.

As livestock APR bison are subject to Montana Department of Livestock and the Federal Department of Agriculture disease management and reporting policies and regulations. APR also follows IUCN guidelines for managing bison health. IUCN guidelines are particularly concerned with controlling pathogens that: (1) significantly limit bison population growth directly by reducing survival and (or) reproduction; (2) pose threats to livestock and wildlife populations because this can lead to opposition to bison recovery. These pathogens are generally exotic, having originated from domestic livestock populations, and include bovine tuberculosis, brucellosis, *Mycoplasma bovis*, and malignant catarrhal fever.

Bison herd health is key to APR’s successfully fulfilling our mission. If a potentially problematic pathogen is detected, APR will consult with neighbors, agencies and veterinarians and may follow one of three management approaches, depending on the pathogen and the potential impacts it might have: 1) a passive approach that primarily involves ongoing monitoring, which may or may not lead to implementing approaches 2 and 3; 2) a control strategy where actions are taken to limit disease prevalence, spread, or risk; 3) eradication, where actions are taken to remove the disease from the population.

2.q. Lack of Ability to Keep Bison on Their Assigned Pastures and Damage to Neighbors’ Property and Livestock by Escaped Bison
See Rationale, Progress to Date, and Strategies and Actions for Goals 2 and 4 in the BMP, Appendixes 2 and 4 in the BMP and Appendix A and B of the Proposed Action. Also see APR NEPA Comment 2.f. above. See APR fence construction diagrams and APR fence photos in the Appendix A of these comments.

*2002.05 Final Report on Electric Fence and Big Game Movement and Livestock Containment by Karhu and Anderson* discuss the effectiveness of electric fence in containing livestock, including bison.

There are certainly areas on these lands that will be challenging to build and maintain fences. APR did not request bison grazing on the Dog Creek Allotment of the PN Unit at this time for that reason. APR is also aware that fencing on the
Starve Out Flats and Deadman Coulee Allotments in the Arrow Creek area of the PN Unit will be challenging. Upon an initial review we believe we can effectively build and maintain the fence needed there and in other proposed fence locations of the Proposed Action, knowing it will require substantial time and attention for maintenance, which APR will allocate the resources for. However, if upon further review we decide that is not the case we will leave those allotments or portions of them as leased cattle grazing allotments at this time.

2.r. Lack of ID on Bison
As of February, 2018, nine APR bison carry GPS satellite collars, over 580 have been ear tagged, nearly 220 have had passive integrated transponder (PIT) tags inserted, more than 230 have received radio- frequency identification (RFID) buttons tags, and over 230 are branded.

2.s. Shift in Local Social System
Agriculture has and will continue to be the dominant industry in the area. See APR NEPA Comment 1.d. above.

APR supports local communities and neighbors in the same way other local businesses do, by purchasing goods and services, supporting other non-profit organizations through financial contributions, and providing employment opportunities. APR employees support their local communities, businesses, and neighbors in the same manner other residents of the area do. In addition, APR’s Wildsky Ranch and grazing lease programs assist the agriculture community. APR has also authorized lessees and neighbors to cut hay and harvest grass seed from APR properties.

APR provides some other benefits to the local area and county through employment opportunities and increased bed taxes. When people have gotten stuck or had vehicle mechanical problems on the CMR, south of APR deeded land, and call Phillips County Sheriff’s Office for assistance, the Sheriff calls APR. Our employees have used APR trucks to help those that are stuck, have housed their livestock until they can get back for them, and have generally provided services that in most places people would just expect to pay for a tow truck. All of this was done at no cost to the Sheriff’s office or the people involved, even though it was not APR’s responsibility and the people were not on APR land.

2.t. APR is Receiving Preferential Treatment No Other Livestock Operator Would
APR’s request for change of use is consistent with BLM policy and regulations. Any livestock owner could make the same or similar request. The BLM has issued numerous year-round grazing permits, some of them in Phillips County. Further, even if differential treatment were being requested – which is not the
case – it would be warranted by the differences between APR’s program and that of a typical livestock operator. Bison, the region’s native grazer, are much better adapted to extremes of climate and utilize the range very differently than cattle.

APR has over a decade of experience with year-round grazing, some absent of interior fencing, on portions of our Sun Prairie Unit. This management unit is subject to all BLM regulations and either meets or is improving conditions from past cattle grazing impacts in regards to BLM standards for range and riparian health. The BLM’s evaluation of range health on the Sun Prairie Unit is a matter of public record.

BLM’s new pilot Outcome Based Grazing program, supported by several livestock organizations, is testing the idea of having less prescriptive BLM grazing requirements to allow operators flexibility, as long as they meet rangeland standards. APR’s past and future success will be another example of how Outcome Based Grazing can work.

Some questions to consider in addressing this perceived concern:

- How many livestock operators would want to do what APR is suggesting?
- Would other livestock operators want to live with the same low stocking rate on their deeded land that is allowed on BLM?
- Would they want to incorporate BLM standards and guidelines on their deeded land?
- Are they interested in having their cattle on BLM land, further from their home base operation and sometimes inaccessible, during the winter and when the cattle are calving?

2.u. Safety Risks Associated with Bison and Liability Associated With Those Risks

APR and leasing agencies have the same liability for APR’s bison as they do for other lessees’ cattle. APR carries liability insurance and the government provides their own. There are similar risks associated with cattle on grazing allotments.

There are also risks on public land associated with wildlife such as rattlesnakes, grizzly bears, black bears, cougars, moose, etc. This has not kept the public from visiting the areas with those species; in fact sometimes they visit in hopes of seeing the animals, just as they will with the bison. For example, people continue to hike, backpack, camp, hunt, and fish in areas of western Montana with healthy grizzly bear populations.

The risk of being harmed by APR bison is minute. For comparison, 2015 was the highest number of bison caused injuries in Yellowstone in recent years. That year there were 4,900 bison and 4,097,709 visitors in Yellowstone National Park. Five
visitors, 0.00012% of the visitors, were injured by bison. Three people were seriously injured. There were no human deaths related to bison. All injured people were closer than the Park’s required 75’ distance from the bison and most were within 10’. Given the vast and open landscape of the American Prairie Reserve, people and bison will usually have ample time and room to avoid getting this close to each other. See Notes From Field Injuries Associated with Bison Encounters - Yellowstone National Park 2015 MMWR and Yellowstone National Park Visitors Statistics.

APR has hosted numerous visitors, including bison harvesters and other hunters. The bison have lived adjacent to several neighbors for over 10 years and some neighbors trail their cattle through APR bison pastures. Yet in all those interactions no harm has come to visitors, neighbor’s cattle, or bison harvesters. Nor has wildlife hunting or bison harvest caused the bison to stampede or charge.

See the Public Safety information provided by the MT FWP and This Land Was Built for Bison.

2.v. NEPA Analysis Needs an Environmental Impact Statement (EIS) Instead of an Environmental Assessment
An EIS is necessary when there will be significant impacts. The BLM determines what is and is not significant. However, it is probably not in the best interest of other permittees nor consistent with BLM’s stated intention to reduce the level of environmental analysis for grazing allotments to set the precedent of completing an EIS for a mere 18 allotments. Especially given that renewal of over 100 allotments in the same general area is currently being undertaken under an EA. BLM would have a hard time defending any conclusion that an EIS is required for a native species to graze in their natural manner at low to moderate stocking levels while non-native species of livestock do not require at least the same level of analysis. This would be made even more difficult to defend given the obvious environmental benefits of APR’s proposal.

2.w. This NEPA Analysis and Process is a Waste of Taxpayer and BLM Funds
The NEPA analysis and process is legally required for a legal request made by APR. However, unlike most grazing allotment analysis, APR, as the requesting permittee, is funding the analysis by paying the bills of NEPA contractor EMPSi, who works directly for the BLM. Contract NEPA is a common practice in some other NEPA cases such as oil, gas, and mining.

APR believes their proposal provides environmental and public benefits, which are documented in depth in the BMP and in the supportive comments their proposal received.
2.x. Public Access to Public Land and Access For BLM Administration of Grazing Standards and Guidelines on All Lands

APR’s mission includes public access and enjoyment. It is one of the public benefits they provide as a non-profit 501(c)(3) organization. Most of the public land leases under this proposal can be accessed via public roads such as State, County, or BLM roads over which APR has no control. APR provides access to public land through and on its deeded property. The few small parcels of public land that cannot be accessed via public roads, on the PN Unit - purchased in 2016, were made accessible to the general public through APR deeded land in 2017. APR also provides resources such as maps, road signs, interpretive signs, trip planning tools, lodging and camping facilities, etc. to facilitate and encourage public use of public and APR deeded land. Bison and increased wildlife provide yet another reason for the public to visit both.

APR will gladly work with the BLM and State to identify where gates or auto-gates are needed to ensure public access to public land and BLM and State access to administer grazing on all lands. APR will provide those gates and auto-gates and will maintain them, except those the BLM is already responsible for maintaining.

As with fences used by past cattle rancher owners, APR provides and maintains either gates or auto gates at locations where roads intersect the fence. Users of the public or deeded land can also go under the fence. If this is determined to be a significant issue APR is also willing to install and maintain, at reasonable locations, stiles or specialized gates that allow people but not bison to pass over or through the fence.

2.y. Local Residents Should Have the Most Influence on BLM Decisions for Local Areas

BLM lands are Federally managed public lands owned by all Americans. All US taxpayers share in the cost of managing the lands and should also share in the benefits and influence on how those lands are managed.

Locals already receive the most benefit from public land because it is most accessible to them. While locals may be more familiar with the affected region, they do not necessarily have the best interest of the general public, as opposed to their own private interest, as their top priority. BLM must consider that some local commenters have the opportunity for personal financial gain if APR lost their priority grazing privileges and the allotments became available to others. At least one neighbor has already expressed an interest to BLM in acquiring an APR held grazing allotment.
The BLM must consider the interests of all members of the public, including local citizens as well as the broader public that has a stake in the management of these lands, in addressing APR’s proposal.

2.z. APR is Coming in and Telling Long Time Locals What to Do
APR is a private property rights supporter and does not comment on land they do not own, including how the neighbors manage their own property or their public land grazing leases. It is not our business. Instead, APR is focused on managing their own land, livestock, and programs.

Since inception, APR has been transparent with its intentions for land purchasing and land use. APR’s mission and goals for the land and the public grazing privileges it acquires is a matter of public record and has been for 15 years. While APR’s mission and goals differ from the local norm, they are not a commentary or critique of the goals or management of other local landowners.

2.a.a. Proposed Action Shared Incorrect Information About Allotment Run in Common and Provides APR Too Many AUMs From That Allotment
The incorrect information in the Proposed Action regarding the shared allotment was the result of human error - mine, and nothing more. I either misheard or misunderstand the information I had received and then shared regarding the use of the shared allotment. In the Proposed Action APR voluntarily proposed to stock their deeded land at below normal moisture stocking rates, when normal moisture stocking rates would have resulted in 8,454 more AUMs, equating to 704 more animals. Clearly, whatever few AUMs APR would have acquired through my error regarding the in common allotment was not a motivating factor.

It is our understanding the lessees of the East Dry Fork Allotment, which is run in common, have been asking to split the allotment for a number of years, even prior to APR holding a portion of the allotment. In recent years the permittees have worked out a system, which the BLM is aware of, where only APR grazes Pasture 1, only the other lessees grazes Pasture 2, and APR and the other lessees share Pasture 3 - with the other lessees using approximate 200 of the 891 AUMs in Pasture 3. Prior to submitting each of the APR Proposed Actions (original and revised), APR contacted the other permittee of the allotment ran in common and suggested an interest in and possible alternatives for splitting the allotment or resolving the issues of sharing the allotment, which the other lessees indicated they would consider (November 16, 2016 - in person meeting, the week of December 1, 2016 - phone call, and June 14, 2017 - in person meeting). In all of those contacts APR also made it clear they were willing to consider other alternatives created by the other lessees. APR continues to be willing to work with the other lessees and BLM to reach agreements equitable to everybody, which was evident in our offer to meet with the other lessees again in early May.
of 2018 - they indicated they could not meet at that time, and then later when we met with them and the BLM on May 30, 2018.

See APR NEPA Comment 2.11. and BMP Goal 2 Rationale - Cattle to Bison regarding the safety of the other lessees and their livestock while trailing through an APR bison pasture or grazing in common with APR bison.

2.a.b. APR is a Cover to Acquire Oil, Gas, and Mineral Rights
Grazing privileges on BLM grazing allotments and State leases do not convey any oil, gas, or mineral rights. Those are separate leases and follow a different bidding and award process. In addition, the oil, gas, and mineral rights on the deeded land in the APR region are often retained by the Federal Government, depending on the original patent and subsequent transactions. APR’s purpose and the public benefits they provide are clearly identified on their application as a non-profit organization and are not related to oil, gas, or mineral development.

2.a.c. APR is Funded by Foreigners
Citizens from other countries have long loved and wanted to support the preservation of the American West, and bison, as can be seen through current visitation to Yellowstone and Glacier National Parks, the historic paintings and drawings of the American western plains by Swiss and German artist Karl Bodmer in the 1800s, and writings of German explorer, entomologist, and naturalist Prince Maximilian of Wied-Neuwied also in the 1800s.

Non-profit organizations are allowed to accept donations and support from people who are not citizens of the USA. Some foreign citizens can receive tax benefits in their own country for donations made in the USA, if they are made through a non-profit organization established in their home country. Friends of American Serengeti (FoAS) is one such independent, tax-privileged organization in Germany.

In APR audited financials, we are required to disclose areas of "concentration". In Note #15 we state that in 2016, APR received 74% of its revenue from 4 donors. In 2015, we received 81% of our revenue from 5 donors. This is to be expected given our organization’s need for large cash donations and operating norms of receiving the bulk of our funding from a handful of major donors.

- In Note #17 we disclose related party transactions - that we get donations from Board Members and that we get donations from FoAS.
- Note #17 clearly states that we received $1,077,958 from FoAS in 2016 and $0 from FoAS in 2015.
- On our Form 990 - APR reported $12,683,610 in revenue for 2016. Donations from FoAS equates to only 8% of revenue in 2016 and 0% in 2015.
APR has approximately 1,600 members of which approximately 3% reside in Northeastern Montana, 17% reside in Montana, and 99% reside in the USA. Since inception APR has received donations from 3,600 distinct households and entities, of which approximately 14% reside in Montana and approximately 98% reside in the United States. Of APR cash donations and pledges to date 97% of the funds are from households or entities residing in the United States.

2.a.d. APR’s Past Grazing Leases to Others Indicate a Loss of Control of Their Base Property and Invalidates Their Claim to the BLM Grazing Permits
APR’s grazing leases to others follow BLM regulations and have been approved by the BLM in advance. In some cases the BLM grazing permits were assigned to the lessee because they were using and controlling the base property. In other cases APR and the lessee had a livestock management agreement and paid the BLM a surcharge, similar to how The Nature Conservancy’s Matador Ranch operates its grazing leases.

2.a.e. Under the Taylor Grazing Act Bison Are Not Livestock and It is Not Legal for Them to Be Authorized to Graze BLM Allotments
As per Department of the Interior Bureau of Land Management 43 CFR Part 4100, Grazing Administration–Exclusive of Alaska, Section 4130.6-4 states:

Special grazing permits or leases authorizing grazing use by privately owned or controlled indigenous animals may be issued at the discretion of the authorized officer. This use shall be consistent with multiple-use objectives. These permits or leases shall be issued for a term deemed appropriate by the authorized officer not to exceed 10 years.

The courts have upheld this section of the CFR.

2.a.f. APR is Using Its Grazing Allotments to Provide Guest Services and Is Not Authorized or Paying to Do So
APR has obtained Letters of Agreement with the BLM for Non-Commercial Recreation Use such as group site tours and group ranch maintenance. Where required APR also obtained Special Recreation Permits from the BLM. APR’s public bison harvest is a commercial activity that would require a Special Recreation Permit to occur on public land but in the 2018 season of February-March all bison harvests were restricted to deeded land, see the Public Bison Harvest requirements at https://apr2018.auction-bid.org/microsite/custom and other web links associated with this web page.

2.a.g. APR Must Comply With County Bison Ordinances
APR has and will comply with the County Bison Ordinances to the degree they are found to be legal and do not present great practical difficulties or
unnecessary hardships. To date, APR has only grazed bison in Phillips County. APR has been in communication with Phillips County Conservation District on their Bison Ordinance implementation.

2.a.h. APR Built Fence Without BLM Approval or NEPA
All APR fence work related to BLM allotments was completed in consultation with the BLM. Affected neighbors were also contacted.

There seems to be a couple of actions for which BLM lessees and perhaps even BLM employees have very different understanding of the NEPA and approval requirements. Those actions include fencing and trailing livestock. APR suggests BLM send a letter to all BLM permittees and BLM employees clarifying the NEPA and BLM approval requirements for new fencing, fence maintenance, fence relocations, and fence replacement. Likewise, APR suggests the same information be shared regarding the need for livestock trailing permits and their NEPA and BLM approval requirements. This information, along with consistency between BLM offices and with all BLM permittees could be a positive improvement in these areas.

2.a.i. APR is Removing Water Developments and Will Not Provide Adequate Water for Their Bison and Thereby Are Reducing the Potential For Future Users of the Grazing Allotments and For Wildlife
See the BMP Objectives, Rationale, Progress to Date, and Strategy and Actions for Goals 2, 5, 6, 7, and 10 and Appendix 2.

As is its private property right, APR has removed a few water developments on its deeded land, where it was identified as a positive step in stream restoration. APR has also lost some water developments on its deeded land as a result of flooding and failing structures. In some cases APR has converted its irrigation water rights to In-Stream Flow water rights.

APR has not removed water developments on public lands. In their Proposed Action APR committed to maintaining the BLM and State water developments for which the permittee/lessee is responsible. However, if at some point the BLM and APR agree some water impoundments could be removed for stream restoration efforts APR would be a willing partner in that work. NEPA with all of its public notification and comment requirements may be required for such actions.

APR has mapped and identified the water sources on its property and grazing leases as well as some potential future water developments. See the maps in Appendix B of these comments.

2.a.j. APR Has No Management Plan and Doesn’t Manage Their Bison
See the *American Prairie Foundation Bison Reintroduction Plan*, undated but originally written in 2004 and the new *American Prairie Reserve Bison Management Plan* (BMP). APR has outgrown it’s 2004 Bison Reintroduction Plan and over the last year plus has been developing our new comprehensive BMP. Substantial research is included in this peer reviewed BMP. The BMP is a living document intended to be updated and modified as new best practices, learning, research, and land acquisitions present themselves. The BMP includes APR’s plans for drought, flood, wildfire, heavy snow, and disease management. The BMP is still undergoing its final review so future edits are a possibility.

While APR prefers a hands-off approach to bison management, that term should not be confused with lack of management. We pay close attention to the health and wellbeing of our bison, we monitor their movements and impact on the land, and we observe how they interact with species that depend on them. The bison is a keystone species in the prairie ecosystem and we are working hard to help them regain their place within a fully-functioning ecosystem.

APR is happy to share their BMP with our accomplishments, plans, management practices, and learning with the BLM and the public. APR is looking forward to further implementing the BMP for the benefit of our bison herd and the restoration of APR lands. However, it is worth noting that no such plan is expected or required from other livestock managers. APR understands it is not the BLM, but rather some of the general local public and some local government bodies setting this expectation for APR. Again, it is worth pointing out that any new requirement placed on or new standards required for APR can also become requirements for all other livestock managers.

2.a.k. APR Wants to Convert Their Bison to Free-Roaming Wildlife
See BMP Objectives, Rationale, Progress to Date, and Strategy and Actions for Goals 4 and 7 and Appendix 1 of the BMP.

APR has and will continue to encourage and offer support to MFWP to initiate a well-designed plan to establish wild bison in the State of Montana, including on the CMR Refuge. APR has offered assistance in such an effort including providing bison and fencing. If the proper management tools and agreements were in place regarding bison management APR would consider contributing bison to the State of Montana to become wild bison. However, the decision on wild bison is a decision that lies with the State and such a decision does not seem likely in the near future. There are several management, financial, and social issues that would need to be addressed for the State to make this decision.

APR will continue to manage their land and bison as outlined in their BMP.

2.a.l. APR Wants to Reintroduce Wolves and Grizzly Bears to the Region
See BMP Objectives, Rationale, Progress to Date, and Strategy and Actions for Goal 7.

APR desires and supports a fully functional grassland ecosystem, including the full suite of all native wildlife. APR does not have the authority to reintroduce a wildlife species to the region. That authority lies with the Fish and Wildlife Service for Federally listed species and with the State for other species and could only be done after consultation with the State, other land managers, and the public.

There is growing evidence that wolves and grizzly bears are gradually recolonizing the grasslands, as their populations grow and they naturally disperse. APR is interested in working with neighbors and others to prepare for the return of these species to the region. The Wild Sky Ranch program pays ranchers to implement specific wildlife friendly practices and for tolerance of specific species of wildlife on their property, including bonus payments for camera trap photos of certain species on the property. APR is also interested in supporting the implementation of proven methods of reducing conflicts between wildlife and livestock and/or people in the region and in expanding the testing and knowledge of new methods and tools to reduce those conflicts.

2.a.m. APR Doesn’t Feed Their Bison in the Winter
See BMP Objectives, Rationale, Progress to Date, and Strategy and Actions for Goal 2.

APR provides supplemental feed for their bison as needed. However, bison need this less often than cattle because they are physically capable of moving large amounts of snow to reach forage. In addition, during the cold bison metabolic rate is reduced while cattle metabolic rate increases.

2.a.n. APR Might Support Public Access and Hunting Now But There Are No Guarantees They Will in the Future
See BMP Objectives, Rationale, Progress to Date, and Strategy and Action for Goals 7 and 11 and APR NEPA Comments 1.e. and 2.x. above.

As noted previously most of the public land leases under this proposal can be accessed via public roads such as State, County, or BLM roads. Therefore, APR does not control access to the majority of these public lands and does not control hunting on them. APR’s continuing support of robust populations of wildlife and reduction in barriers to wildlife movement through the removal of interior fences will help improve wildlife viewing and hunting opportunities in the area. APR’s continued development of recreation based facilities and information will likewise continue to improve public access opportunities. So even if, at some speculative and unknown point in the future, APR limited access to its deeded land, like many current land owners currently do, APR would still have improved recreation and hunting opportunities in the area.
2.a.o. APR is Withdrawing Land From the State FWP Block Management Program
See BMP Objectives, Rationale, Progress to Date, and Strategy and Action for Goals 7 and 11 and APR NEPA Comments 1.e., 2.x., and 2.a.n. above.

APR had over 22,000 acres enrolled in the Block Management Program in 2017. APR also managed a public hunting program on other properties, see https://www.americanprairie.org/hunting for additional information. By managing the hunting on their own property APR became responsible for all the administrative costs of that hunting program and did not receive Block Management payments from FWP for the hunting on those land units.

APR has been clear they believe the land can support larger populations of wildlife, which would in turn improve the hunting and wildlife viewing opportunities, even on public land. The rules for public hunting on APR deeded land are intended to help increase wildlife populations.

2.a.p. APR Needs to Comply With the MTFWP Conservation Easements on It’s Burnt Lodge and Timber Creek Units
The MTFWP Conservation Easements on APRs Burnt Lodge and Timber Creek Units are designed to protect in perpetuity significant communities of native plants, wildlife and wildlife habitat, natural and scenic open space, and recreation values worthy of perpetual conservation and valuable to the people of Montana and to provide reasonable access for recreational hunting.

APR has met with the MTFWP regarding the conservation easements and this proposal. APR will be formally requesting MTFWP modify the conservation easements to allow bison year-round continuous grazing and interior fence removal. Based on the scientific information in the American Prairie Reserve Bison Management Plan APR will fully protect and likely improve the conservation and recreational values identified in the conservation easements with the modifications that will be proposed.

See APR NEPA Comments 1.a., 1.b., 1.e., 1.f., 2.a. - c., 2.i. - l., 2.u., 2.x., 2.a.i., 2.a.n., and 2.a.o.

Given the recent BLM Outcome Based Grazing pilot program and the science related to grazing systems it is possible that BLM Allotment Management Plans will be modified significantly over time. It is in the best interest of others who hold BLM allotments and who have MTFWP conservation easements on their property that MTFWP is open to grazing systems other than the rest rotation system, as long as the new system can still provide the protection for the conservation values identified in the easement. It is also in the best interest of
MTFWP and the people of MT that conservation easements are managed to protect the conservation values while still providing as much flexibility as possible to the land owners. This will help ensure future conservation easements can be acquired.

Thank you for the opportunity to comment.

Regards,

/s/ Betty Holder

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Appendix A - APR Fencing Diagrams and Photos

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Gate

- 1: Brace Post Insulator
- 2: T-post Insulator
- 3: 5.5' T-post
- 4: High Tensile Tension Insulator
- 5: Clamp
- 6: 3.5' Wood Post

H-Brace

1: Brace Post Claw Insulator
2: T-post Claw Insulator
3: 5.5' T-post

Barbed 42" High Tensile 30"
Barbed 24" Smooth 16"

Created by Paint X
Appendix B - APR Water Developments

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No warranty is made regarding completeness or accuracy of this data. Not all water sources depicted have been verified on the ground. Agricultural use water rights were not considered. Map represents the best available information compiled and/or digitized from the following sources: Bureau of Land Management (BLM) Range Improvement Project (RIP) records, Ground Water Information Center (GWIC) well records, Montana Department of Natural Resources and Conservation (DNRC) water rights records, hand drawn maps, satellite imagery, and personal knowledge.

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[End of Appendix B]