

This proposal helps Department of Interior address some of their recreation, wildlife restoration, and big game migration priorities

Feel free to use this guidance to encourage BLM to properly consider and analyze the proposal's alignment with several high priority orders issued by the Department of Interior to improve habitat quality, increase hunting and outdoor recreation opportunities, and improve western big game migration corridors. Specifically, the proposal can assist DOI in achieving orders #3362, #3356 and #3347 in addition to maintaining rangeland health requirements.

BLM should analyze how the 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. 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.

BLM should analyze how the 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 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 Reserves 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.

BLM should analyze how the 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.

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.