



# United States Department of the Interior



BUREAU OF LAND MANAGEMENT  
Malta Field Office  
501 South 2<sup>nd</sup> Street East  
Malta, Montana 59538  
<http://www.blm.gov/montana-dakotas>

July 28, 2022

Dear Permittee or Interested Public:

## NOTICE OF FINAL DECISION

On March 29<sup>th</sup>, 2022, the Bureau of Land Management (BLM) issued a Notice of Proposed Decision, in addition to a Finding of No Significant Impact (FONSI), concerning seven BLM grazing allotments administered by the Malta Field Office in Phillips County, Montana. The seven allotments are Telegraph Creek (allotment #05654), Box Elder (allotment #15634), Flat Creek (allotment #15439), Whiterock Coulee (allotment #15417), East Dry Fork (allotment #05617), French Coulee (allotment #05616), and Garey Coulee (allotment #05447)—all of which are located within the Malta Field Office in Phillips County, Montana.

This letter serves as notice of a final grazing decision. A full range of alternatives were analyzed in the American Prairie Reserve Bison Change of Use Environmental Assessment (EA) (DOI-BLM-MT-L010-2018-0007-EA). Maps of the allotments affected by this final decision are included in the EA. The EA, FONSI and supporting information can be viewed at the following web location: <https://eplanning.blm.gov/eplanning-ui/project/103543/510>.

## INTRODUCTION

American Prairie Reserve (APR) has acquired grazing preference on the associated BLM allotments through the purchase or acquisition of private land serving as base property for these specific BLM grazing allotments.<sup>1</sup> On September 24, 2019, the APR<sup>2</sup> submitted a proposal to manage their base properties and associated grazing allotments to allow for a change in class of livestock from cattle to domestic indigenous livestock (bison). The proposal also requested a change to the current authorized seasons-of-use, modifications of some exterior fences, and building or removal of some interior fences. The proposal included a request to modify many fence structures with an electrified wire.

This final decision comprises approximately 63,065 acres of BLM-administered lands and currently provides 7,969 animal unit months (AUMs) of permitted use. Within the project area boundaries, in addition to the 63,065 acres of BLM-administered lands, there are 32,710 acres of private land deeded to the APR and 5,830 acres of state lands administered by the Montana Department of Natural Resources and Conservation. This final decision only applies to those lands administered by BLM.

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<sup>1</sup> "Grazing preference" or "preference" means a superior or priority position against others for the purpose of receiving a grazing permit or lease. This priority is attached to base property owned or controlled by a permittee or lessee. 43 Code of Federal Regulations (CFR) 4100.0-5.

<sup>2</sup> American Prairie Reserve (APR), American Prairie Foundation (APF) and American Prairie (AP) are all the same entity, which is listed as the base property owner and is the permittee of record. The term American Prairie Reserve (APR) is used as a common reference to the applicant.

Prior to preparation of the EA, the public was notified of APR's proposed action on ePlanning and through a news release on March 21st, 2018, announcing a public scoping period from April 9th to May 9th, 2018. The news release also provided notice of a series of four BLM-hosted in-person open house-style public meetings, which were held on April 9th and 12th, 2018, in four communities in north-central Montana: Winnett, Winifred, Malta and Glasgow. Following publication of the preliminary EA on July 1st, 2021, BLM received requests for a comment period extension; therefore, the comment period was extended from 60-days to 90-days and closed September 28, 2021. One virtual public meeting was held on July 21st, during which BLM staff described the proposed action, provided instruction on submitting comments on the EA, and accepted verbal public comments. Throughout the duration of the public comment period, BLM received comments primarily through the comment mechanism that was provided on the project website. Comments were also received by mail. Several revisions to the EA were made based on public comments received, and an additional report detailing these changes, as well as BLM's response to public comments received during this period, is provided on the project website. A proposed grazing decision was issued on March 29th, 2022, initiating a 15-day protest period. Certified letters of notification were sent to 396 interested publics. From the initial 396 letters, 18 letters of protest were received. BLM carefully considered each protest and has provided a response as an attachment to the decision.

### **ALTERNATIVES CONSIDERED**

Four alternatives were presented in the EA: Alternative A, (No Action Alternative) which represents the continuation of current management and conditions that would persist if the proposal were not approved; Alternative B (Applicant Proposed Alternative); Alternative C, an alternative combining the applicant's proposal (bison grazing) with the current management practices (grazing management and season of use); and Alternative D (No Grazing), which identifies land acreages within the allotments be devoted to a public purpose, precluding any sort of livestock grazing. A complete rationale for alternative selection is described below.

### **FINAL DECISION**

It is my decision to select a combination of Alternative B and Alternative C as described in the American Prairie Reserve Bison Change of Use Environmental Assessment (EA) (DOI-BLM-MT-L010-2018-0007-EA).

This decision will implement Alternative B for Telegraph Creek (05654), Box Elder (15634), Flat Creek (15439), and Whiterock Coulee (15417) Allotments. Alternative C is selected for French Coulee (05616), East Dry Fork (05617) and Garey Coulee (05447) Allotments.

Alternative B for the Telegraph Creek (05654), Box Elder (15634), Flat Creek (15439), and Whiterock Coulee (15417) Allotments will be implemented as described in Section 2.3 in the American Prairie Reserve Bison Change of Use Environmental Assessment (EA) (DOI-BLM-MT-L010-2018-0007-EA). Also, pursuant to Alternative B, renewed, 10-year term grazing authorizations will be offered to the APR with modified terms and conditions as described below, for a term of 10-years.

### **Telegraph Creek and Box Elder**

*Telegraph Creek Allotment 05654 (Authorization # 2501506; Current Authorization; No Change)*

Authorization	# of Livestock	Kind of Livestock	Begin Date	End Date	% Public Land	BLM AUMs
Current/New	2	I <sup>3</sup>	3/1	2/28	100	17
	112	I	3/1	2/28	100	1,344

Implementing Alternative B will result in offering a renewed grazing authorization. The Telegraph Creek Allotment will remain fenced, and fences will be maintained in accordance with established Cooperative Range Improvement Agreements. One internal pasture fence will be removed so there would be three pastures, instead of four, on BLM-administered land. Please refer to Appendix A of the EA for details regarding locations of fence removal. Season-of-use will remain as currently permitted, 3/1 – 2/28.

*Box Elder Allotment 15634 (Authorization # 2500017; Current Authorization; No Change)*

Authorization	# of Livestock	Kind of Livestock	Begin Date	End Date	% Public Land	BLM AUMs
Current/New	235	I	3/1	2/28	41	1,158

Implementing Alternative B will result in offering a renewed grazing authorization for the Box Elder Allotment. The construction of two fences will be authorized. One fence is between BLM and Charles M. Russell National Wildlife Refuge (CMR), and another fence between BLM and deeded lands. Please refer to Appendix A of the EA for details regarding locations of fence construction. Season-of-use will remain as currently permitted, 3/1 – 2/28.

### **Flat Creek**

*Flat Creek Allotment 15439 (Authorization # 2504616)*

Authorization	# of Livestock	Kind of Livestock	Begin Date	End Date	% Public Land	BLM AUMs
Current	2	C <sup>4</sup>	3/1	2/28	100	21
	187	C	5/1	11/15	100	1,222
New	2	C/I <sup>5</sup>	3/1	2/28	100	21
	203	C/I	4/1	9/30	100	1,222

Implementing Alternative B will authorize a change in season-of-use and kind of livestock use from cattle to cattle and/or bison. The grazing season will be authorized from 4/1 to 9/30, and from 3/1 to 2/28 on small custodial parcels. On the Flat Creek Allotment, one interior fence will be removed so there will be four pastures, instead of five, on BLM-administered land. Another small fence segment in proximity to deeded lands will be removed. Other interior and exterior fences may be modified by adding one electric wire. Please refer to Appendix A of the EA for details regarding locations of fence removal and modifications. Changes in fencing will allow Flat Creek to be grazed as a four-pasture rest–rotation system where one pasture is rested each year and one pasture is deferred during the growing season each year. The rest and deferred pastures will be different each year of the 4-year cycle.

<sup>3</sup> I denotes species of authorized domestic livestock as indigenous (bison).

<sup>4</sup> C denotes the species of authorized domestic livestock as cattle.

<sup>5</sup> C/I denote species of authorized domestic livestock as cattle and/or indigenous (bison).

### Whiterock Coulee

#### *Whiterock Coulee Allotment 15417 (Authorization # 2500511)*

Authorization	# of Livestock	Kind of Livestock	Begin Date	End Date	% Public Land	BLM AUMs
Current	16	C	3/1	2/28	100	193
	416	C	5/1	10/31	74	1,862
New	16	C/I	3/1	2/28	100	193
	418	C/I	4/1	9/30	74	1,862

Implementing Alternative B will authorize a change in season-of-use and kind of livestock use from cattle to cattle and/or bison. The grazing season will be authorized from 4/1 to 9/30, and from 3/1 to 2/28 on small custodial parcels. Several interior fences will be removed creating three pastures, instead of four. Modification and reconstructions will occur to select interior and exterior fences by adding one electric wire. In addition, one fence will be constructed. Please refer to Appendix A of the EA for details regarding locations of fence removal, modifications, construction, and reconstruction. Changes in fencing will allow the allotment to be grazed in a three-pasture deferred rotation system where one pasture is deferred during the growing season each year.

It is my final decision to implement Alternative C for French Coulee (05616), East Dry Fork (05617) and Garey Coulee (05447) Allotments as described in Section 2.4 in the American Prairie Reserve Bison Change of Use Environmental Assessment (EA) (DOI-BLM-MT-L010-2018-0007-EA). Also, pursuant to Alternative C, renewed, 10-year term grazing authorizations will be offered to the APR with modified terms and conditions as described below, for a term of 10-years.

### East Dry Fork, French Coulee, and Garey Coulee Allotments

#### *French Coulee Allotment 05616 (Authorization # 2500276)*

Authorization	# of Livestock	Kind of Livestock	Begin Date	End Date	% Public Land	BLM AUMs
Current	1	C	3/1	2/28	100	7
New	1	C/I	3/1	2/28	100	7

#### *East Dry Fork Allotment 05617 (Authorization # 2500276)*

Authorization	# of Livestock	Kind of Livestock	Begin Date	End Date	% Public Land	BLM AUMs
Current	225	C	5/1	11/30	100	1,584
New	225	C	5/1	11/30	100	1,584

#### *Garey Coulee Allotment 05447 (Authorization # 2500611)*

Authorization	# of Livestock	Kind of Livestock	Begin Date	End Date	% Public Land	BLM AUMs
Current	3	C	3/1	2/28	100	40
	74	C	5/1	11/30	100	521
New	3	C/I	3/1	2/28	100	40
	74	C/I	5/1	11/30	100	521

Reconstruction/electrification of the existing allotment boundary fence will be authorized in the Garey Coulee and French Coulee Allotments.

## TERMS AND CONDITIONS/STIPULATIONS

In addition to the Standard Terms and Conditions found on all grazing permits, the following Terms and Conditions would apply to all allotments and Cooperative Range Improvement Agreements, as appropriate:

1. A *Livestock Control Agreement* or *Pasturing Agreement* must be filed with the authorized officer and approval received prior to any grazing use for livestock which graze the public lands that are being leased or are not owned by the permittee or lessee (43 CFR 4130.7(d)).
2. In order to improve livestock and rangeland management on the public lands, all salt and/or mineral supplements must be located at least 0.25 mile from water located on public land (any riparian area, wet meadow, or watering facility) (43 CFR 4130.3-2(c)).
3. Numbers of livestock may vary within the permitted season of use as long as the total permitted AUMs are not exceeded (HiLine RMP; BLM 2015a).
4. An Actual Livestock Grazing Use Report **must** be submitted to the Malta BLM Office within 15 days after livestock are removed from the Allotment(s).
5. All range improvements shall be installed, used, maintained, and/or modified on the public lands, or removed from these lands, in a manner consistent with multiple use management, and as agreed to in a Cooperative Range Improvement Agreement (43CFR 4120.3-1(a)) and contingent upon site-specific cultural resource inventory results.
6. All water developments and tanks will include functional wildlife escape ramps.
7. Per Appendix B of the HiLine RMP (BLM 2015a), all fences within 1.2 miles of Greater Sage-Grouse leks should be marked to decrease the chance of Greater Sage-Grouse collisions.
8. The authorized officer may modify terms and conditions of the permit or lease when the grazing use or related management practices are not meeting the land use plan, allotment management plan or other activity plan, or management objectives, or is not in conformance with the provisions of subpart 43 CFR 4180 Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration.
9. Failure to pay grazing bills within 15 days of the due date specified in the bill shall result in a late fee assessment of \$25.00 or 10 percent of the grazing bill, whichever is greater, but not to exceed \$250.00. Payment made later than 15 days after the due date shall include the appropriate late fee assessment. Failure to make payment within 30 days may be a violation of 43 CFR 4140.1(b)(1) and shall result in action by the authorized officer under 43 CFR 4150.1 and 4160.1-2 (43 CFR 4130.8-1(t)).
10. All permits and leases shall be made subject to cancellation, suspension, or modification for any violation of these regulations or of any term or condition of the permit or lease (43 CFR 4130.3-1(b)).
11. If on-the-ground monitoring determines that livestock grazing has prevented suitable habitat conditions for Greater Sage-Grouse on more than half of three or more than three key monitoring sites within an allotment, livestock numbers will be reduced by 10 percent. They may be reduced another 10 percent the following year if habitat conditions remain unimproved. Livestock numbers would only be restored to full numbers when a management action plan is in place to correct the reason(s) for the failure. Desired Conditions for Greater Sage-Grouse Habitat are found in Table 2.3-2 of the HiLine RMP.

12. On permits containing both cattle and/or domestic indigenous livestock listed for Kind of Livestock, those permits will allow for any combination of cattle or domestic indigenous livestock during the listed season of use.
13. Tagging or identification of individual bison would meet the requirements of Montana Department of Livestock.
14. Disease testing would meet Montana Department of Livestock requirements.
15. Except where otherwise indicated, allotments would be fenced as shown on fence maps (see **Appendix A of EA**, Maps), and fences would be maintained per specific standards (see **Appendix B of EA**, Fence Design and Maintenance). Range improvement projects will be constructed, maintained, modified, reconstructed in accordance with approved Cooperative Range Improvement Agreements established prior to implementation. Electric fence notification signs will be required at gates and cattle guards. Single cattleguards will be replaced with double cattleguards. Proper signage indicating electrified wire will also be installed. Gates would be non-electrified. Additional features to further ensure public safety will also be incorporated into project design, as needed.
16. To ensure adequate public vehicular access, gates and/or cattleguards will be installed in fences on every publicly accessible road or trail. Additional gates will be installed along fences where access is recommended by BLM. As a general rule, at least one gate will be installed every 0.50 mile and in sharp angle corners. The Permittee will be required to install additional gates, stiles, or fence ladders where additional public access may be needed in order to ensure public safety.
17. For all Active Use allotments, The Permittee has the flexibility to apply to turn out earlier or stay later up to 14 days on the allotment provided AUMs allocated are not exceeded. The application must be submitted to the BLM before the grazing use occurs, reviewed by BLM specialists and approved by the authorized officer.
18. Grazing use will be in accordance with this Final Decision for all allotments.

## **RATIONALE**

The Selected Alternative responds to an external proposal and fully addresses BLM's need to consider changes in class of livestock, changes to seasons of use, construction, reconstruction, and/or removal of range improvement projects, allotment adjustments and administrative actions. The Selected Alternative provides for ten year permits that include terms and conditions that will either maintain and/or improve, or have no adverse effects on resource conditions and issues identified in Section 1.5 of the EA. The effects analysis in Chapter 3 indicates that the Selected Alternative, to a greater degree than other alternatives, meets BLM's need to respond to the proposal while incorporating terms and conditions that best facilitate management that will meet Standards of Rangeland Health (Standards) and conform to the Guidelines for Livestock Grazing Management (Guidelines). Because the effects analysis and Finding of No Significant Impact (FONSI) did not identify adverse effects and noted several instances where beneficial effects are expected to occur, the Selected Alternative was determined to be more responsive to the Purpose and Need than Alternative A or Alternative D.

Grazing permits contain terms and conditions determined by the authorized officer to be appropriate to achieve the management and resource condition objectives for the public lands and ensures conformance with Fundamentals of Rangeland Health (43 CFR §4130.3). Existing conditions for all seven of the allotments are described in land health assessments conducted by the Malta Field Office in 2016 and 2019. Additionally, Chapter 3 of the EA found that the allotments will continue to meet or make progress towards meeting Standards and Guidelines (August 1997) under all

Alternatives, but to a greater degree for the Selected Alternative. Moreover, those areas being grazed by bison will experience improvements to vegetative communities including variation in vegetative communities, diversified vegetation and an increase in native plant species. Because bison tend to graze in patches, the result is a patchy distribution of vegetation that encourages plant species diversity by allowing forbs to flourish. Species such as Greater-Sage Grouse will benefit from an increase in native forbs. Because bison tend to spend less time and forage greater distances from water, improvements to riparian vegetation and riparian function will also be seen. This will improve habitat conditions for aquatic and riparian wildlife species, such as amphibians and riparian birds, by increasing the availability of habitat features, such as canopy cover and nesting sites, due to increased riparian vegetation diversity and abundance. Reduced erosion and sedimentation will improve in-stream habitat by improving water quality and hydrological function, which are important habitat characteristics for some special status fish species.

The Final Decision to implement the Selected Alternatives is in conformance with 43 CFR §4130.2 and 43 CFR §4130.3-2 because the grazing authorizations are being issued to a qualified applicant, include types of use, levels of use authorized, and specifies appropriate terms and conditions. The permittee is in substantial compliance with the rules and regulations and the terms and conditions in the existing permits; has demonstrated conformance with Standards of Rangeland Health (Standards) and Guidelines for Livestock Grazing Management (Guidelines) on all allotments, including where bison grazing is already authorized; and has a satisfactory record of performance. Domestic bison grazing is an authorized, managed and permitted use on BLM. Other similar BLM authorizations for privately controlled bison currently exist in the North Central Montana District, Montana/Dakotas and nationally. Kind of livestock, number of livestock, the period of use, the allotments to be used, and the amount of use are specified in the tables shown above for the Selected Alternative. Specific terms and conditions are being added to the permits to ensure conformance with Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration (43 CFR §4130.3-1(c)). The associated permitted use specified is appropriately attached to the base property supporting the grazing permits. (43 CFR §4110.2-2). A proposal that contained a complete description of mandatory and other terms and conditions, range improvement projects and a description of associated grazing system that adequately serve as functional allotment management plans (43 CFR §4120.2) was appropriately filed with the authorized officer at the local Bureau of Land Management Office having jurisdiction over the public lands involved (§4130.1-1).

The permits will include other terms and conditions that specify the kind of livestock that will graze, including the type of domestic indigenous livestock authorized to graze, actual use reporting, and the percentage of public land use determined by the proportion of livestock forage available on public lands within the allotments. Other terms and conditions are specified in the grazing permits that assist in achieving management objectives and proper range management by identifying the kinds of livestock authorized to graze under specific terms and conditions (43 CFR §4130.3-2(e)).

Under 43 CFR 4130.3-2 an authorized officer may specify the kinds of indigenous animals authorized to graze under specific terms and conditions for a grazing permit issued under 43 CFR 4130.2. These terms and conditions may include the class of livestock, per 43 CFR 4130.3-2(a), and/or the kinds of indigenous animals authorized to graze, per 43 CFR 4130.3-2(e). These terms and conditions, as well as other terms and conditions listed in 4130.3-2, will assist in achieving management objectives, provide for proper range management or assist in the orderly administration of the public rangelands. Other authorities (43 CFR 4130.6) can also be issued to authorize grazing use by privately owned or controlled indigenous animals. Other authorities, specifically special grazing permits (43 CFR 4130.6-4) are not administratively unique from any other grazing permit or lease. As such, there is no distinction in BLM's Rangeland Administration permitting system (RAS) to issue special grazing permits separate from other types of permits and leases and the authority is seldom used. While there are many similarities, 43 CFR 4130.6-4 states that

these other grazing authorizations are discretionary and have no priority for renewal, and cannot be transferred or assigned. Provisions under 4130.2 are more applicable to permits contained in the final decision because the permittees meet the mandatory qualifications and maintain established grazing preference through demonstrated control of associated base properties. This authority allows authorization of both cattle and cattle/indigenous (C/I) category that better responds to the permittee's proposal for both kinds of livestock. Authorizations contained in the final decision allow for phased implementation of the proposed action and fully processes and renews permits, as specified in the purpose and need section of the EA. Permit issuance in the final decision best ensures management of bison and cattle to assist in the orderly administration and use of the public rangelands (43 CFR 4100.0-2,43 CFR 4130.2-2).

Preferable to Alternatives A and D, the Selected Alternatives best facilitate coordination of public land grazing management with intermingled and adjacent deeded base property (43 CFR §4100.0-2) because it reduces potential indirect effects to wildlife and special status species on adjacent and intermingled lands that may occur due to increases in the density of range improvements. Alternatives A or D, if chosen, would likely increase density of fences and water features on the adjacent private lands. These range improvements may not be constructed to wildlife-friendly standards, so the overall impact on some wildlife species could be detrimental. For example, while the amount of fencing that would be added to adjacent private lands is unknown, the need for additional fencing to be constructed by landowners to prevent livestock trespass from bison or under a No-Grazing scenario on BLM-administered lands could result in indirect impacts on Greater-Sage Grouse, including increased fragmentation, increased collisions with fences, and increased raptor predation from inappropriate fence location and design that provides for raptor perches (BLM 2013).

Bison will not be authorized in the East Dry Fork (05617) Allotment to allow for continued common cattle grazing which will best assist in the orderly administration of the public rangelands (43 CFR 4130.3-2). Selecting Alternative C for East Dry Fork, Garey Coulee, and French Coulee Allotments responds to the proposal while continuing cattle grazing in the East Dry Fork Allotment while authorizing bison grazing in Garey Coulee and French Coulee Allotments.

Initially, APR proposed to fence a portion of the East Dry Fork Allotment (allowing for private use) and use that portion of the East Dry Fork Allotment in conjunction with the French Coulee and Garey Coulee Allotments in a grazing rotation (see Appendix A for map). After consulting with APR and the other operator in the East Dry Fork Allotment, no agreement could be reached on how to equitably divide up the East Dry Fork Allotment, therefore, Alternative C was selected for the East Dry Fork, French Coulee and Garey Coulee Allotments. APR will be required to run cattle in the East Dry Fork Allotment but will be allowed to run either cattle or bison in the French Coulee and Garey Coulee Allotments. French Coulee has only 80-acres of BLM administered lands and is already authorized as a custodial allotment. Garey Coulee will maintain its current season of use and the pasture fence will remain in place to maintain current grazing management practices.

Implementing the Selected Alternatives is in conformance with the Hi-Line District Resource Management Plan (RMP), approved in September 2015, The RMP considered a No-Bison Grazing Alternative but eliminated the alternative from detailed study because domestic bison grazing was determined to be consistent with federal regulations. Page 13 of the Hi-Line Proposed RMP/Final EIS states, "*Any future proposals to change the class of livestock from cattle to bison would be considered as provided by the grazing regulation*". The grazing regulations provide for authorizing grazing permits for privately owned indigenous animals. BLM has also permitted bison on allotments in other areas of Montana, Colorado, New Mexico, North Dakota, South Dakota, and Wyoming. Any future proposals to change the kind of livestock from cattle to bison would be considered as provided by the grazing regulations. A distinction is made between bison that are privately owned and considered livestock and those that are



considered wildlife (publicly owned) that fall under the jurisdiction of the State of Montana. The Department of the Interior Bison Conservation Initiative (DOI 2008) provides guidance to address the health and genetic composition of the Department's bison herds in seven national wildlife refuges and five national parks, which are all outside of the planning area. Authorization of bison grazing through a grazing permit identifies bison as domestic and provides for management and control of these livestock.

The goal of livestock grazing in the RMP is to provide opportunities on the public rangelands for a maintainable level of livestock grazing consistent with multiple use and sustained yields. BLM prioritizes renewal of grazing permits in Priority Habitat Management Areas (PHMA) and includes assurances that if livestock use is adversely affecting Greater Sage-Grouse or their habitat, terms and conditions may be modified or changes in active use can be considered. Distribution of livestock, season, intensity, distribution and kind of livestock (including domestic bison) can be considered to meet seasonal Sage-Grouse habitat requirements. The Selected Alternatives include an additional term and condition to prevent deterioration of suitable habitat conditions for Greater sage-grouse habitat and identifies the desired conditions for Greater Sage-Grouse Habitat as identified in the RMP: *If on-the-ground monitoring determines that livestock grazing has prevented suitable habitat conditions for Greater Sage-Grouse on more than half of three or more than three key monitoring sites within an allotment, livestock numbers will be reduced by 10 percent. They may be reduced another 10 percent the following year if habitat conditions remain unimproved. Livestock numbers would only be restored to full numbers when a management action plan is in place to correct the reason(s) for the failure. Desired Conditions for Greater Sage-Grouse Habitat are found in Table 2.3-2 of the HiLine RMP.* In addition, Grazing management will include a more standard season-of-use which includes both rest and deferred rotation grazing systems. Alternative B of the EA will allow bison to graze in early spring (April 1<sup>st</sup>) which will increase grazing intensity on some allotments, but the deferred grazing and rest-rotation grazing regimes will ensure that no two pastures will be used in consecutive years during the growing season. Grazing under Alternative C will continue in accordance with listed seasons on the permits which will result in conformance with Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration.

Because bison move much greater distances each day (especially from water sources), and forage over much larger areas, the impacts from grazing during the growing season will be minimal. If grazing results in negative impact to rangeland health, a reduction of livestock numbers will occur in accordance with the terms and conditions of the permit. Smaller allotments or custodial pastures with small portions of BLM administer lands will be allowed to be used in conjunction with the operators grazing program as long as Standards and Guidelines continue to be met. Both Telegraph Creek and Box Elder Allotments will continue to be authorized for year-round grazing and monitored in order to study the effects of year-round bison grazing.

The objective of the RMP for livestock grazing is to manage livestock grazing to provide a sustained flow of local economic benefits and protect resource values. Change in use from cattle to domestic indigenous livestock under Alternative B and Alternative C of the EA showed relatively limited economic changes compared with the existing baseline economic conditions, and continuation of current management will not result in any adverse effects on disadvantaged communities that meet the criteria for consideration under environmental justice, including tribal entities. In addition, no scientifically and/or resource management-based reason was identified for why bison should not be permitted to graze BLM land as long as the owner of the animals qualifies as an applicant under the requirements of the grazing regulations. The EA further concluded that changes will not measurably contribute to public health and safety due to the limited potential for close, direct bison encounters with people. Appropriate levels and types of fencing will ensure safe containment. Montana Department of Livestock procedures for detecting and eradicating disease will be followed as required by law. Permittees will be required to install additional gates, stiles, or fence ladders where additional public access may be needed to ensure public safety.

The retention, modification (electrification), construction, removal of specific range improvement projects, as found in Appendix A of the EA, are consistent with 43 CFR §4120.3-1, 43 CFR §4120.3-2 and 43 CFR §4120.3-4 because installation, maintenance, removal and modifications are done in a manner to promote resource objectives consistent with multiple-use management. Any fence that is modified built and maintained will meet special conditions stipulated in the Cooperative Range Improvement Agreement (Form 4120-6), established prior to construction. Special conditions stipulated from design features identified in Appendix B of the EA. Under alternative B, fencing changes will result in 87.4 miles of fence to be retained, 43.9 miles of fence to be reconstructed, 35.7 miles to be reconstructed as electric, 5.2 miles of new fence to be built and, and 30.4 miles to be removed (see Appendix A). Under Alternative C, the reconstruction/electrification of boundary fences in Garey Coulee will modify fences to wildlife-friendly specifications. Overall, both Alternatives B and C incorporate wildlife friendly fence standards and modifications which will improve big game habitat by eliminating or reducing barriers to movement and improve big game migration by allowing wildlife to go over or under fences more easily. Modifying or reconstructing fences will improve habitat for special status species, such as Greater Sage-Grouse, that rely on large and contiguous areas of habitat to support home ranges and/or migration routes (Connelly et al. 2011). Fence removal will also decrease the availability of perches for avian predators in the area, which will potentially decrease mortality of Greater Sage-Grouse and other special status wildlife species that are vulnerable to avian predation. Private landowners in the analysis area continually construct, remove, and modify fences to meet their livestock operational needs. Removal of fences will occur in accordance with 43 CFR 4120.3-6. Cost-share of range improvements varies by project. Salvage will be addressed on a case-by case basis depending on contributions and condition of the project. Decisions on abandonment and the identification of who is responsible for salvage and rehabilitation must be made on a project by project basis. (pg IV-8; H1740-1)

The Final Decision to implement the Selected Alternative is in conformance with the Taylor Grazing Act of June 30, 1934, as amended because it provides for the continued administration, regulation and improvement of public rangelands and fulfills the federal government's involvement in rangeland management to address uncontrolled grazing and rangeland depletion and deterioration. This Final Decision is in conformance with the Federal Land Policy and Management Act (FLPMA, 1976) as amended because it incorporates terms and conditions appropriate for management of permitted lands.

Additionally, this Final Decision to implement the Selected Alternative is in conformance with the Federal Grazing Regulations because it will promote healthy sustainable rangeland ecosystems; promote the orderly use, improvement and development of the public lands; and continue efficient and effective administration of grazing of public rangelands by best facilitating coordination of public land grazing management with intermingled and adjacent deeded base property (43 CFR §4100.0-2).

Finally, given the level of public interest in the proposal, BLM initiated an increased effort to engage local and state cooperators and the interested public to the greatest extent possible. Consultation, cooperation and coordination requirements were met, or exceeded prior to issuance of this decision in accordance with 40 CFR §1500.3(d) and 40 CFR §1506.6. The BLM provided a public scoping period, four public scoping meetings and an extended public comment period on the preliminary EA with an associated public meeting where further public comment was accepted. Supporting documents, project updates, contact information and opportunities to participate were available on BLM's ePlanning website. Though the proposal to allow domestic indigenous livestock grazing conflicts with views and opinions expressed among some users of public lands, such unfavorable views of the proposal itself do not constitute scientific controversy, disagreement about the nature of effects, or provide evidence that the project is not in conformance to BLM's statutory and regulatory requirements. Substantive comments that questioned a point of fact or policy, the accuracy of information, or the methodology or assumptions were fully considered as to whether

potential changes for project and associated analysis were necessary. A summary of substantive concerns and BLM responses are available at the following web location: <https://eplanning.blm.gov/eplanning-ui/project/103543/510>.

## **AUTHORITY**

The following sections of the Code of Federal Regulations, Chapter 43, provide authority for the actions to be undertaken as part of this grazing decision. The language of the cited sections can be found at a library designated as a federal depository or at the following web address:

<https://www.blm.gov/policy/im-2009-109>

§4100 Grazing Administration – Exclusive of Alaska; General

§4100.0-2 Objectives

§4100.0-3 Authority

§4100.0-8 Land use plans

§4110.1 Mandatory Qualifications

§4110.2 Grazing preference

§4110.2-2 Specifying grazing preference

§4120.2 Allotment Management Plans

§4120.3-1 Conditions for Range Improvements

§4120.3-2 Cooperative Range Improvement Agreements

§4120.3-4 Standards, Design, and Stipulations

§4130.1-1 Filing Applications

§4130.2 Grazing Permits or Leases

§4130.3 Terms and Conditions

§4130.3-1 Mandatory Terms and Conditions

§4130.3-2 Other Terms and Conditions

§4130.6-4 Special Grazing Permits

§4160.1 Proposed decisions

§4160.2 Protests

§4160.3 Final decisions

§4160.4 Appeals

§4180.1 Fundamentals of rangeland health

§4180.2 Standards and guidelines for grazing administration

## **RIGHT OF APPEAL**

Any applicant, permittee, lessee or other person whose interest is adversely affected by the final decision may file an appeal in writing for the purpose of a hearing before an administrative law judge in accordance with 43 C.F.R. § 4160.3(c), 4160.4, and 4.470. The appeal must be filed within 30 days following receipt of the final decision. The appeal may be accompanied by a petition for a stay of the decision in accordance with 43 C.F.R. § 4.471, pending final determination on appeal. The appeal and petition for a stay must be filed in the office of the authorized officer, as noted:

Tom Darrington, Field Manager  
Bureau of Land Management  
Malta Field Office  
501 South Second Street East  
Malta, MT 59538

In accordance with 43 CFR § 4160.4, "Appeals and petitions for stay of the decision shall be filed at the office of the authorized officer." As defined in 43 CFR 4.22(a), "A document is filed in the office where the filing is required only when the document is received in that office during its regular business hours and by a person authorized to receive it. A document received after the office's regular business hours is considered filed on the next business day." Therefore, any notice of appeal and/or petition for stay must be sent or delivered in hard copy form to the office of the authorized officer by mail or personal delivery. BLM does not accept fax or email filing of notice of appeal or petition for stay. BLM also cannot accept electronic filing of appeal documents (compact disks, thumb drive, etc.) due to the Federal Information Systems Security Awareness guidance. Within 15 days of filing the appeal, the appellant must provide BLM with proof of service to the other persons named in the Copies Sent To section of this decision in accordance with 43 CFR 4.470(a). A copy of the appeal must also be served on the Office of the Solicitor located at the address below in accordance with 43 CFR 4.413(a) and 4.413(c).

Office of the Solicitor, Billings Field Office,  
Rocky Mountain Region, Department of the Interior  
2021 4th Avenue North, Suite 112  
Billings, MT 59101

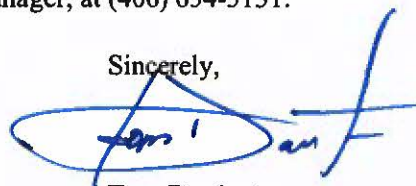
In accordance with 43 CFR 4.413(b), failure to serve a notice of appeal will subject the appeal to summary dismissal as provided in 43 CFR 4.402. The appeal shall state the reasons, clearly and concisely, why the appellant thinks the final decision is in error and otherwise complies with the provisions of 43 CFR § 4.470. Should you wish to file a petition for a stay, see 43 CFR § 4.471 (a) and (b). In accordance with 43 CFR § 4.471(c), a petition for a stay must show sufficient justification based on the following standards:

- (1) The relative harm to the parties if the stay is granted or denied.
- (2) The likelihood of the appellant's success on the merits.
- (3) The likelihood of immediate and irreparable harm if the stay is not granted, and
- (4) Whether the public interest favors granting the stay.

As noted above, the petition for stay must be filed in the office of the authorized officer and served in accordance with 43 CFR § 4.471. Any person named in the decision that receives a copy of a petition for a stay and/or an appeal, is directed to 43 CFR § 4.472(b) for procedures to follow if you wish to respond.

If you have any questions or need additional information, please contact Regina Baltrusch, Public Affairs Specialist, at (406) 791-7778 or Tom Darrington, Field Manager, at (406) 654-5131.

Sincerely,



Tom Darrington  
Field Manager, Malta Field Office

List of attachments:

Attachment 1 - Mailing List

Attachment 2 - Protest Responses

Attachment 1 - Mailing List

<p>CERTIFIED MAILING NO. 7018 3090 0000 4940 4502</p> <p>Montana Department of Fish, Wildlife &amp; Parks PO Box 200701 Helena, MT 59620</p>	<p>CERTIFIED MAILING NO. 7018 3090 0000 4940 4519</p> <p>Badland Cooperative State Grazing District Loran Albus PO Box 422 Glasgow, MT 59230</p>	<p>CERTIFIED MAILING NO. 7018 3090 0000 4940 4120</p> <p>George Alden 24 East Alden Rd Larslan, MT 59244</p>
<p>CERTIFIED MAILING NO. 7018 3090 0000 4940 4137</p> <p>Matt Alford 39360 SW LAURELWOOD RD Gaston, OR 97119</p>	<p>CERTIFIED MAILING NO. 7018 3090 0000 4940 4144</p> <p>Jan Allen 402 Agate Dr Lewistown, MT 59457</p>	<p>CERTIFIED MAILING NO. 7018 3090 0000 4940 4151</p> <p>Stephenie Ambrose Tubbs 900 University Helena, MT 59601</p>
<p>CERTIFIED MAILING NO. 7018 3090 0000 4940 4168</p> <p>Chamois Andersen Defenders of Wildlife 205 S. D Street Livingston, MT 82070</p>	<p>CERTIFIED MAILING NO. 7018 3090 0000 4940 4175</p> <p>Pat Anderson 2429 East Whitewater Rd. Whitewater, MT 59544</p>	<p>CERTIFIED MAILING NO. 7018 3090 0000 4940 4182</p> <p>Wayne Anderson Buggy Creek Cooperative State Grazing District PO Box 422 Glasgow, MT 59230</p>
<p>CERTIFIED MAILING NO. 7018 3090 0000 4940 4199</p> <p>Patricia Annala Kibby Cattle Company Box 202 Raynesford, MT 59469</p>	<p>CERTIFIED MAILING NO. 7018 3090 0000 4940 4205</p> <p>Matthew Annala Hill Livestock Company Box 228 Raynesford, MT 59469</p>	<p>CERTIFIED MAILING NO. 7018 3090 0000 4940 4212</p> <p>John Arnold 266 Snake Creek Road Hinsdale, MT 59241</p>
<p>CERTIFIED MAILING NO. 7018 3090 0000 4940 4229</p> <p>Billie Lou Arnott 948 Highland Rd Hobson, MT 59452</p>	<p>CERTIFIED MAILING NO. 7018 3090 0000 4940 4236</p> <p>John Ascherman 30 Delger Rd Townsend, MT 59644</p>	<p>CERTIFIED MAILING NO. 7018 3090 0000 4940 4243</p> <p>Dave Ashley 625 2nd Street Helena, MT 59601</p>
<p>CERTIFIED MAILING NO. 7018 3090 0000 4940 4250</p> <p>Kent Atwood 4 Ridgewood Ct Clancy, MT 59634</p>	<p>CERTIFIED MAILING NO. 7018 3090 0000 4940 4267</p> <p>Damien Austin P.O. Box 908 Bozeman, MT 59771</p>	<p>CERTIFIED MAILING NO. 7018 3090 0000 4940 4274</p> <p>Adela Awner 1109 DELPHINIUM DR Billings, MT 59102</p>

Attachment 1 - Mailing List

<p>CERTIFIED MAILING NO. 7018 3090 0000 4940 4281</p> <p>Brett Badgett 151 Palisades Blvd. Apt 309 Miles City, MT 59301</p>	<p>CERTIFIED MAILING NO. 7018 3090 0000 4940 4298</p> <p>Louis Bahin 3330 Old Pond Road Missoula, MT 59802</p>	<p>CERTIFIED MAILING NO. 7018 3090 0000 4940 4304</p> <p>Mardrie Baker Box 367 Jordan, MT 59337</p>
<p>CERTIFIED MAILING NO. 7018 3090 0000 4940 4311</p> <p>John Barnard North/South Phillips Cooperative State Grazing District PO Box 189 Malta, MT 59538</p>	<p>CERTIFIED MAILING NO. 7018 3090 0000 4940 3925</p> <p>Karyl Barnes 219 2nd Ave. N. Glasgow, MT 59230</p>	<p>CERTIFIED MAILING NO. 7018 3090 0000 4940 3932</p> <p>Melissa Barnette 21 Wilson Avenue Northwest Leesburg, DC 20176</p>
<p>CERTIFIED MAILING NO. 7018 3090 0000 4940 3949</p> <p>Leo Barthelmess 27288 Content Rd. Malta, MT 59538</p>	<p>CERTIFIED MAILING NO. 7018 3090 0000 4940 3956</p> <p>Dale Bartley 2856 Cacatua Street Carlsbad, CA 92009</p>	<p>CERTIFIED MAILING NO. 7018 3090 0000 4940 3963</p> <p>Dennis Bebee PO Box 455 Malta, MT 59538</p>
<p>CERTIFIED MAILING NO. 7018 3090 0000 4940 3970</p> <p>Daniel &amp; Nancy Belk 9251 Pike Creek Road PO Box 152 WINNETT,MT 59087</p>	<p>CERTIFIED MAILING NO. 7018 3090 0000 4940 3987</p> <p>Robert Bellandi 232 Oarlock Cir. E. Syracuse, NY 13057</p>	<p>CERTIFIED MAILING NO. 7018 3090 0000 4940 3994</p> <p>William Berg 408 Agate Drive Lewistown, MT 59457</p>
<p>CERTIFIED MAILING NO. 7018 3090 0000 4940 4007</p> <p>Peggy Bergsagel 5247 Telegraph Rd. Malta, MT 59538</p>	<p>CERTIFIED MAILING NO. 7018 3090 0000 4940 4014</p> <p>Aubrey Bertram Wild Montana 80 S. Warren St. Helena, MT 59601</p>	<p>CERTIFIED MAILING NO. 7018 3090 0000 4940 4021</p> <p>Tony Bibeau 3190 7th St Havre, MT 59501</p>
<p>CERTIFIED MAILING NO. 7018 3090 0000 4940 4038</p> <p>Jack Billingsley PO Box 768 Glasgow, MT 59230</p>	<p>CERTIFIED MAILING NO. 7018 3090 0000 4940 4045</p> <p>Brian and Sarah Birchler 6916 Houston St Buena Park, CA 90620</p>	<p>CERTIFIED MAILING NO. 7018 3090 0000 4940 4052</p> <p>Norman Bishop 4898 Itana Circle Bozeman, MT 59715</p>

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<p>CERTIFIED MAILING NO. 7018 3090 0000 4940 4069</p> <p>Roseann Blacher 4562 Hunting Hound Lane Marietta, GA 30062</p>	<p>CERTIFIED MAILING NO. 7018 3090 0000 4940 4076</p> <p>Diane Black McCone Conservation District 106 10th Street, PO Box 276 Circle, MT 59215</p>	<p>CERTIFIED MAILING NO. 7018 3090 0000 4940 4083</p> <p>Alan Blakeley 705 N West St Warsaw, IN 46580</p>
<p>CERTIFIED MAILING NO. 7018 3090 0000 4940 4090</p> <p>Troy Blunt 29286 Regina Rd. Malta, MT 59538</p>	<p>CERTIFIED MAILING NO. 7018 3090 0000 4940 4106</p> <p>Jesse Blunt Phillips County Livestock Association PO Box 430 Malta, MT 59538</p>	<p>CERTIFIED MAILING NO. 7018 3090 0000 4940 4113</p> <p>Jay Bodner Montana Stockgrowers Association 420 N. California Street Helena, MT 59601</p>
<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 6018</p> <p>REX BOLLER PO BOX 771 LAKESIDE, MT 59922</p>	<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 6025</p> <p>Dan and Laura Boyce 18422 Bear Springs Winifred, MT 59489</p>	<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 6032</p> <p>Andy Boyce Smithsonian Conservation Biology Institute National Zoological Park 1500 Remount Rd Front Royal, VA 22630</p>
<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 6049</p> <p>Benjamin Bradley 73 Konley Drive Kalispell, MT 59901</p>	<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 6056</p> <p>Dorothy Bradley PO Box 316 Clyde Park, MT 59018</p>	<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 6063</p> <p>Carol &amp; John Brenden PO Box 970 Scobey, MT 59263</p>
<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 6070</p> <p>Jim Brenna 296 S Dell Havre, MT 59501</p>	<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 6087</p> <p>Paul A. Brewer, CWB® 516 West Main Street Toledo, IL 62468</p>	<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 6094</p> <p>Richard Britzman PO Box 52 Glasgow, MT 59230</p>
<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 6100</p> <p>Eric Brown 1268 Pioneer Lane Gentry, AR 72734</p>	<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 6117</p> <p>Edward B. Butcher 7550 Butcher Road Winifred, MT 59489</p>	<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 6124</p> <p>Pam Butcher Box 89 Winifred, MT 59489</p>



Attachment 1 - Mailing List

<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 6131</p> <p>Barbara Butzer 3670 Wisper Lane SE Salem, OR 97317</p>	<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 6148</p> <p>James Cameron 606 Hiawasse Ave Black Mountain, NC 28711</p>	<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 6155</p> <p>Mike Carlson 112 1st Street Glendive, MT 59330</p>
<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 6162</p> <p>Bill Chalgren PO Box 583 Libby, MT 59923</p>	<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 6179</p> <p>Bruce Christofferson 599 Swedes Square Malta, MT 59538</p>	<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 6186</p> <p>Patricia Cohen 4655 GOODAN LN Missoula, MT 59808</p>
<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 6193</p> <p>Sandy Cold Shapero Box 620431 Woodside, CA 94062</p>	<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 6209</p> <p>Stephen Cook 3134 SW Evergreen Lane Portland, OR 97205</p>	<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 6216</p> <p>Richard Cordell PO Box 1032 Kalispell, MT 59903</p>
<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 6223</p> <p>Harry Cosgriffe 2261 Quail Valley Drive Prineville, OR 97754</p>	<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 6230</p> <p>Clinton Cox 10498 North Frenchman Road Whitewater, MT 59544</p>	<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 6247</p> <p>Don Cox 1311 Waukesha Ave Helena, MT 59601</p>
<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 6254</p> <p>William Cramer 743 Brookdale Dr. Bozeman, MT 59715</p>	<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 6261</p> <p>Richard O. Dale PO Box 1570 Malta, MT 59538</p>	<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 6278</p> <p>Kevin Dawe Sweet Grass County Conservation District PO Box 749 Big Timber, MT 59011</p>
<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 6285</p> <p>Hal J. DeBoer PO Box 728 Malta, MT 59538</p>	<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 6292</p> <p>Margaret and Jay Ann Demarais 7607 Emond Road Malta, MT 59538</p>	<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 6308</p> <p>United Property Owners of Montana Denowh/Robbins PO Box 247 Roy, MT 59471</p>

Attachment 1 - Mailing List

<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 6315</p> <p>Tom and Joy Depuydt Phillips County Farm Bureau PO Box 338 Saco, MT 59261</p>	<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 6322</p> <p>Diann DeRosier 227 Snowy Mountain Dr. Lewistown, MT 59457</p>	<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 6339</p> <p>Margaret Dillon PO Box 1043 LITCHFIELD, CT 06759</p>
<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 6346</p> <p>Paul Dinkins 2122 Boylan Rd Bozeman, MT 59715</p>	<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 6353</p> <p>Diane Dirkson 3065 Porter St. NW Washington, DC 20008</p>	<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 6377</p> <p>Andrew Dreelein 1307 West Lincoln Hwy DeKalb, IL 60115</p>
<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 6384</p> <p>Vicki W.Dunaway Buffalo Creek Cooperative State Grazing District 1250 15th St W STE 202 Billings, MT 59102</p>	<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 6391</p> <p>Shirley Dunbar 3928 North Whitewater Rd. Whitewater, MT 59544</p>	<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 6407</p> <p>Noel Emond PO Box 1371 Malta, MT 59538</p>
<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 6414</p> <p>Brian and Vicki Eggebrecht 8270 US Hwy 191 South Malta, MT 59538</p>	<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 6421</p> <p>Vandalia Ranch Inc. Eliot Strommen - President 305 Nelson Avenue, Box 1 Vandalia, MT 59273</p>	<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 6438</p> <p>Joshua Elliott 735 N 5th St W Missoula, MT 59802</p>
<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 6445</p> <p>Erik Engebretson Box 202 Malta ,MT 59538</p>	<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 6452</p> <p>William, Dave&amp; Linda Ensign 13255 Rainbow Drive Bigfork, MT 59911</p>	<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 6469</p> <p>Larry Epstein 237 Izaak Walton Inn Rd Essex, MT 59916</p>

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<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 6476</p> <p>Nancy Ereaux 24090 Content Rd. Malta, MT 59538</p>	<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 6483</p> <p>Mitch Ereaux 621 25th Ave NE Great Falls, MT 59404</p>	<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 6490</p> <p>Michael Fred Ereaux Montana Community Preservation Alliance PO Box 1015 Malta, MT 59538</p>
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Attachment 1 - Mailing List

<p>CERTIFIED MAILING NO. 7022 0410 0001 9501 7504</p> <p>John Fahlgren Valley County Board of Commissioners501 Court Square #1 Glasgow, MT 59230</p>	<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 0016</p> <p>Jerome Faith PO Box 455 Vaughn, MT 59487</p>	<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 0023</p> <p>Janet Talcott 3553 Bundy Road Worden, MT 59088</p>
<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 0030</p> <p>Kevin Farron 2615 Argenta Court Missoula ,MT 59808</p>	<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 0047</p> <p>Patricia Fauth 116 Mf Ln Opheim, MT 59250</p>	<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 0054</p> <p>Doug &amp; Jill Flament PO Box 1082 Lewistown, MT 59457</p>
<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 0061</p> <p>Steve Forrest 12046 Rainbow Drive Truckee, CA 96161</p>	<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 0078</p> <p>Erica Freese 3751 E Flower St Tucson, AZ 85716</p>	<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 0085</p> <p>William R. and Lela French 37737 Content Rd. Malta, MT 59538</p>
<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 0092</p> <p>Jessica French 402 Jobe Lane Challis, ID 83226</p>	<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 0108</p> <p>Craig R. &amp; Conni French 8861 Sun Prairie Road Malta, MT 59538</p>	<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 0115</p> <p>Taylor French 39350 Content Road Malta, MT 59538</p>
<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 0122</p> <p>Mark French 364 Knudsen Dr Malta, MT 59538</p>	<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 0139</p> <p>Rona Fried 231 West Pulaski Rd Huntington Station, NY 11746</p>	<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 0146</p> <p>Dwayne Garner 2120 Tipperary Way Missoula, MT 59808</p>
<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 0153</p> <p>Ronald Garwood 72 Garwood Rd Nashua, MT 59248</p>	<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 0160</p> <p>Pete Geddes American Prairie Reserve P.O. Box 908 Bozeman, MT 59771</p>	<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 0177</p> <p>Fred &amp; Glenna Gillett Gillett Livestock PO Box 173 Winnett, MT 59087</p>

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<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 0184</p> <p>Shirlee Glade PO Box 1998 Thompson Falls, MT 59873</p>	<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 0191</p> <p>Melva M.Glouzek 15 Riverview Drive Thompson Falls, MT 59873</p>	<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 0207</p> <p>Mark Good 917 3rd Ave South Great Falls, MT 59405</p>
<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 0214</p> <p>David Green Amy H &amp; RR Nielsen Revocable Family Trust 100 N. Davis Street Belgrade, MT 59714</p>	<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 0221</p> <p>Jeanie Green 5046 Loring Cutacross Road Whitewater, MT 59544</p>	<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 0238</p> <p>Joe Griffin 1121 W. Diamond Butte, MT 59701</p>
<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 0245</p> <p>Al &amp; Pat Irish 515 8th Ave W Roundup, MT 59072</p>	<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 0252</p> <p>Paul Grove PO Box 370 Eureka, MT 59917</p>	<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 0269</p> <p>Clinton Grue P.O. Box 216 TERRY,MT 59349</p>
<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 0276</p> <p>Cara Gwalthney 3540 Rain Forest Dr W Jacksonville,FL 32277</p>	<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 0283</p> <p>Barbara Hagofsky 498 East High Street Kittanning,PA 16201</p>	<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 0290</p> <p>Steve &amp; Debbie Hale 558 Hale Lane Mosby,MT 59058</p>
<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 0306</p> <p>Alisa Hale 305 Hylande DR Great Falls,MT 59405</p>	<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 0313</p> <p>Mark and Sarah Haliaferro 614 Ranch Access S Wibaux,MT 59353</p>	<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 0320</p> <p>Ann Halverson 1312 Babcock Apt. C Bozeman,MT 59715</p>
<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 0337</p> <p>Vic and Leigh Hansen 2781 Hwy 323 Ekalaka,MT 59324</p>	<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 0344</p> <p>Montana Farm Bureau Federation 502 S. 19th Ave. Suite 104 Bozeman,MT 59718</p>	<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 0351</p> <p>Judy Harris PO Box 98 Lakeside,MT 59922</p>

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<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 0368</p> <p>Michael Harrison 24 Cervens Road Tolland,CT 06084</p>	<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 0375</p> <p>Eileen Hastad 1423 23rd Avenue South Moorhead,MN 56560</p>	<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 0382</p> <p>Gary W.Hawk 5860 Kerr Dr. Missoula,MT 59803</p>
<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 0399</p> <p>Michael Hayes 19272 Black Butte Rd Lewistown,MT 59457</p>	<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 0405</p> <p>Travis Heater 9 Sunny Shore Dr Trout Creek,MT 59874</p>	<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 0412</p> <p>Patrick K.Hickey 817 Strater Road East Malta,MT 59538</p>
<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 0429</p> <p>Pam Higgins 1140 Yuri Road Helena,MT 59602</p>	<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 0436</p> <p>Bridgar &amp; Jessica Hill 1124 West Park Street #10 Livingston,MT 59047</p>	<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 0443</p> <p>Dave &amp; Yvonne Hinman PO Box 220 Malta, MT 59538</p>
<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 0450</p> <p>Glenn Hockett 745 Doane Rd Bozeman,MT 59718</p>	<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 0467</p> <p>Mari Hoffmann P.O.Box 704 Missoula,MT 59801</p>	<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 0474</p> <p>Stan &amp; Betty Holder PO Box 717 281 Just About Rd Eureka, MT 59917</p>
<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 0481</p> <p>Michael Honeycutt Montana Department of Livestock 301 N. Roberts Helena,MT 59601</p>	<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 0498</p> <p>Raylee Honeycutt Montana Association of State Grazing Districts; Montana Public Lands Council 420 N California St Helena,MT 59601</p>	<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 0504</p> <p>Don Hook 324 Hastings Rd Sand Coulee,MT 59472</p>
<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 0511</p> <p>Cheryl Hren Hren Ranches Inc. PO Box 948 Dillon,MT 59725</p>	<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 0528</p> <p>Harold Hunter 1755 Moffit Gulch Road Bozeman,MT 59715</p>	<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 0535</p> <p>Reece, Linda and Miles Hutton Hutton Ranch PO Box 144 Turner,MT 59542</p>

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<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 0542</p> <p>ANNEMARIE IRISH 942 AVE C. APT 2 BILLINGS, MT 59102</p>	<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 0559</p> <p>Lee Iverson Chain Buttes Cooperative State Grazing District PO Box 151 Winnett, MT 59087</p>	<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 0566</p> <p>David Jachowski 258 Lehotsky Hall Clemson University Clemson, SC 29634</p>
<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 0573</p> <p>Perri Jacobs 21436 Dry Fork Road Malta, MT 59538</p>	<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 0580</p> <p>Marvin Jacobson 105 13th St Circle, MT 59215</p>	<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 0597</p> <p>Doug James 1570 Westridge Circle Billings, MT 59102</p>
<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 0603</p> <p>Cort Jensen State of Montana Department of Agriculture 302 North Roberts Helena, MT 59602</p>	<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 0610</p> <p>LARRY JESS 40007 ROAD 60 S. HAVRE, MT 59501</p>	<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 0627</p> <p>Keith Johnson Box 186 Fortine, MT 59918</p>
<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 0634</p> <p>Mark Johnstad PO Box 981 EMIGRANT, MT 59027</p>	<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 0641</p> <p>Jack Jones 3014 Irene Street Butte, MT 59701</p>	<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 0658</p> <p>Michael Jorgenson 2183 Swan Hwy Bigfork, MT 59911</p>
<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 0665</p> <p>Ronald Joseph 9 Wild Duck Drive Sidney, ME 4330</p>	<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 0672</p> <p>Isaac Kantor 3130 Pattee Canyon Road Missoula, MT 59803</p>	<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 0689</p> <p>Chester and Terrie Kallem PO Box 104 Ulm, MT 59485</p>
<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 0696</p> <p>Douglas Kary 1943 Lake Hills Drive Billings, MT 59105</p>	<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 0702</p> <p>Loyal Kauffman PO Box 1101 Glasgow, MT 59230</p>	<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 0719</p> <p>Ted and Norma Kelly PO Box 773 MALTA, MT 59538</p>

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<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 0726</p> <p>Greg and Claudette Kielb PO Box 1073 Malta, MT 59538</p>	<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 0733</p> <p>Millie Kindle 4172 Bowdoin Rd. Malta, MT 59538</p>	<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 0740</p> <p>Bryan Kindle 7361 Bowdoin Road Malta, MT 59538</p>
<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 0757</p> <p>Michael King 209 5th Avenue Helena, MT 59601</p>	<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 0764</p> <p>Chris King PO Box 187 Winnett, MT 59087</p>	<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 0771</p> <p>Jay King Petroleum County Conservation District P.O. Box 118 Winnett, MT 59087-0118</p>
<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 0788</p> <p>Daniel Kinka 816 West 4th Street Anaconda, MT 59711</p>	<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 0795</p> <p>Dan Kluck 4385 Kluck Road Malta, MT 59538</p>	<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 0801</p> <p>Karla Knox 3671 Woodhawk Rd. Winifred, MT 59489</p>
<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 0818</p> <p>Carolyn Knox PO Box 387 Denton, MT 59430</p>	<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 0825</p> <p>Austin Knudsen Montana Department of Justice 215 N. Sanders PO Box 201401 Helena, MT 59620-1401</p>	<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 0832</p> <p>Vondene Kopetski 7373 Stonehaven Avenue Missoula, MT 59803</p>
<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 0849</p> <p>Ron and Maxine Korman PO Box 162 Hinsdale, MT 59241</p>	<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 0856</p> <p>Terry Korman PO Box 72 Saco, MT 59261</p>	<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 0863</p> <p>Kevin and Brenda Koss Phillips County Commission 10341 Larb Hills Road Malta, MT 59538</p>
<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 0870</p> <p>John Lacey, PH. D PO Box 534 Glasgow, MT 59230</p>	<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 0887</p> <p>LaMae Lacock PO Box 188 Hinsdale, MT 59241</p>	<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 0894</p> <p>Sherman Lacock PO Box 134 Hinsdale, MT 59241</p>



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<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 0900</p> <p>Steven Lacock PO Box 188 Hinsdale, MT 59241</p>	<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 0917</p> <p>Mike Lang PO Box 104 MALTA, MT 59538</p>	<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 0924</p> <p>Carol and Leah LaTray 10889 Winifred Hwy Hilger, MT 59451</p>
<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 0931</p> <p>Camille LaTray 610 S 44th St. #6306 Billings, MT 59106</p>	<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 0948</p> <p>Griffin Lawrence 509 S Black Ave Bozeman, MT 59715</p>	<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 0955</p> <p>Bethany Legare PO Box 1086 Wolf Point, MT 59201</p>
<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 0962</p> <p>Jocelyn Leroux Western Watersheds Project PO Box 8837 MISSOULA, MT 59807</p>	<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 0979</p> <p>Gordon Levin 6200 Copper Rose Drive Helena, MT 59602</p>	<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 0986</p> <p>Ralph Lewis 10990 Highway 11 Birchdale, MN 56623</p>
<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 0993</p> <p>Roxann Lincoln 1003 9th Ave. Helena, MT 59601</p>	<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 1006</p> <p>Karen Linford PO Box 1430 Seeley Lake, MT 59868</p>	<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 1013</p> <p>Dennis Linneman 12880 Triple L Lane Lolo, MT 59847</p>
<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 1020</p> <p>Patrick Lupton 751 Professional Drive Apt 71 Bozeman, MT 59718</p>	<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 1037</p> <p>Hal Luttschwager 1106 Ronald Avenue MISSOULA, MT 59801</p>	<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 1044</p> <p>Maralyn Lytle P O Box 4148 Helena, MT 59604</p>
<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 1051</p> <p>Elizabeth Madden 408 Overbrook Drive Bozeman, MT 59715</p>	<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 1068</p> <p>R.D. Marks PO Box 1592 Ennis, MT 59729</p>	<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 1075</p> <p>Blaine Martin 241 Blazer Tr Bozeman, MT 59718</p>

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<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 1082</p> <p>Anne Martinez 80 Gannon Drive Great Falls, MT 59404</p>	<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 1099</p> <p>David Marx PO Box 4241 Whitefish, MT 59937</p>	<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 1105</p> <p>Molly Masters Missouri River Conservation Districts Council PO Box 118 Winnett, MT 59087</p>
<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 1112</p> <p>Larry L. Maurer 2390 26th Lane NE Brady, MT 59416</p>	<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 1129</p> <p>Donald W. McAndrew 205 James Ave. Bozeman, MT 59715</p>	<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 1136</p> <p>Patrick McGuffin 250 Ulm Vaughn Rd Great Falls, MT 59404-6313</p>
<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 1143</p> <p>Joan McKeown 393 B Hickory Street St. Marie, MT 59231</p>	<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 1150</p> <p>Keith Menasco 14079 N 90th Dr Peoria,AZ 85381</p>	<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 1167</p> <p>Loretta Menge PO Box 48 Saco, MT 59261</p>
<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 1174</p> <p>Darrell Menge 6 Beaverton Main St. Saco, MT 59261</p>	<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 1181</p> <p>Jacqueline Mercenier 1333 Ancient Trail Forest Grove, MT 59441</p>	<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 1198</p> <p>Diane Merrick 238 Mayo Avenue Vallejo, CA 94590</p>
<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 1204</p> <p>Levi and Shilo Messerly Messerly Angus Ranch 345 Edgewater Lane Malta, MT 59538</p>	<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 1211</p> <p>John Meyer Cottonwood Environmental Law Center P.O. Box 412 Bozeman, MT 59771</p>	<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 1228</p> <p>Jay Meyer 3652 Meyer Lane Stevensville, MT 59870</p>
<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 1235</p> <p>Rick Miller 308 1st Ave N. PO Box 65 Moore, MT 59464</p>	<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 1242</p> <p>Rick Miller 312 E. Lake Ave. Lewistown, MT 59457</p>	<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 1259</p> <p>William and Ruth Mitchell 4787 Mitchell Road Dodson, MT 59524</p>

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<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 1266</p> <p>June Molgaard 1204 West Alderson Street Bozeman, MT 59715</p>	<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 1273</p> <p>Mark Momberg 4615 Equestrian Lane Bozeman, MT 59718</p>	<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 1280</p> <p>Glenn Monahan 420 North 10th Avenue Bozeman, MT 59715</p>
<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 1297</p> <p>Margaret Morgan 1370 Bitterroot Rd Helena, MT 59602</p>	<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 1303</p> <p>Anna Morris 111 East Blvd Lewistown, MT 59457</p>	<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 1310</p> <p>Mikayla Moss Friends of the Missouri Breaks Monument PO Box 1932 Helena, MT 59624</p>
<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 1327</p> <p>James Murdock 7179 North Whitewater Road Whitewater, MT 59544</p>	<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 1334</p> <p>Clinton Nagel Gallatin Wildlife Association PO Box 5317 Bozeman, MT 59717</p>	<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 1341</p> <p>Duane Nelson 922 Union Rd Circle, MT 59215</p>
<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 1358</p> <p>David Nolt 907 West Chinook Street Livingston, MT 59047</p>	<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 1365</p> <p>Gary Oakley 21 Camino Quien Sabe Santa Fe, NM 87505</p>	<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 1372</p> <p>David Oakley 6606 South Boulder Road Boulder, CO 80303</p>
<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 1389</p> <p>Sonny Obrecht PO Box 156 Turner, MT 59542</p>	<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 1396</p> <p>Darrell and Vicki Olson 24114 Content Road Malta, MT 59538</p>	<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 1402</p> <p>Jason &amp; Whitney Olson PO Box 67 Lolo, MT 59847</p>
<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 1419</p> <p>Kathleen O'Neal Gear Red Canyon Buffalo Ranch PO Box 1329 Thermopolis, WY 82443</p>	<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 1426</p> <p>Greg and Jenny Oxarart 27623 Regina Rd. Malta, MT 59538</p>	<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 1433</p> <p>Paul Pacini 303 State Street Helena, MT 59601-5788</p>

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<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 1440</p> <p>Bronte Page 33 Oak Tree Court Murphys, CA 95247</p>	<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 1457</p> <p>Debra Pankratz PO Box 1115 Malta, MT 59538</p>	<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 1464</p> <p>Carolyn Pardini 1002 15th Ave E Polson, MT 59860</p>
<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 1471</p> <p>Jim Parker 212 Bedford Street Hamilton, MT 59840</p>	<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 1488</p> <p>Mark Pearson 2942 Lily Drive Bozeman, MT 59718</p>	<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 1495</p> <p>Ron Peortner Missouri River Stewards PO Box 45 Winifred, MT 59489</p>
<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 1501</p> <p>Elizabeth Perkins 355 Matterhorn Dr Rapid City, SD 57702</p>	<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 1518</p> <p>Joe Perry 4125 Circle S. Road Brady, MT 59416</p>	<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 1525</p> <p>Roger &amp; Robin Peters PO Box 8 Roy, MT 59457</p>
<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 1532</p> <p>Marshall Pierce 21280 Nine Mile Rd Huson, MT 59846</p>	<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 1549</p> <p>Jerry Pierce 7148 McGinnis Meadows Road Libby, MT 59923</p>	<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 1556</p> <p>Wanda Pinnow PO Box 39 410 Bracket Butte Rd Baker, MT 59313</p>
<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 1563</p> <p>David Pippin 158 Heather Lane Glasgow, MT 59230</p>	<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 1570</p> <p>Matthew Poole Department Natural Resources and Conservation PO Box 1007 Glasgow, MT 59230</p>	<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 1587</p> <p>Fred Potter 933 5th Avenue South Glasgow, MT 59230</p>
<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 1594</p> <p>Pat Povah PO Box 924West Yellowstone, MT 59758</p>	<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 1600</p> <p>Dwain "Fritz" Prellwitz PO Box 1408 Malta, MT 59538</p>	<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 1617</p> <p>Melisa Presley 802 Pine St Lot 11 Warner Robins, GA 31093</p>

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<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 1624</p> <p>Katheryn Qanna Yahu 513 1/2 W. Curtiss St. Bozeman, MT 59715</p>	<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 1631</p> <p>Chris Raber 4585 Jack Rd Chambersburg, PA 17202</p>	<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 1648</p> <p>Ellison Ranch 1825 Swingley Rd McLeod, MT 59052</p>
<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 1655</p> <p>Alan Redfield 538 Mill Creek Rd Livingston, MT 59047</p>	<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 1662</p> <p>Kay J. Reilly 1201 Highland Blvd. Apt B-303 Bozeman, MT 59715</p>	<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 1679</p> <p>Erik Renna 131 Candle Lane Bozeman, MT 59715</p>
<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 1686</p> <p>Rob Reukauf PO Box 546 Terry, MT 59349</p>	<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 1693</p> <p>Chris Rich 18910 8TH AVE NW, #323 Shoreline, WA 98177</p>	<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 1709</p> <p>Gail and John Richardson 5263 Cimmeron Drive Bozeman, MT 59715</p>
<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 1716</p> <p>John Rizzi 220 W 5th Street Winnemucca, NV 89445</p>	<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 1723</p> <p>Jim Robinson Mill Iron Ranch Co. PO Box 1381 Malta, MT 59538</p>	<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 1730</p> <p>Rachel Rockafellow, RN 1202 S. Spruce Dr Bozeman, MT 59715</p>
<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 1747</p> <p>Brent Roeder Montana Wool Growers Association PO Box 1693 Helena, MT 59624</p>	<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 1754</p> <p>John Rollyson PO Box 53 Roy, MT 59471</p>	<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 1761</p> <p>Chad, Madison, Molly, Riggs &amp; Michelle Rotenberger 13003 Welch Fire Pl Lundow, SD 57755</p>
<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 1778</p> <p>Alex Russell 210 S 8th St Livingston, MT 59047</p>	<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 1785</p> <p>Kenneth Ruzicka PO Box 1313 Malta, MT 59538</p>	<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 1792</p> <p>Russ Saffian 14137 Pine St Bigfork, MT 59911</p>

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<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 1808</p> <p>Greg and Ruth Salveson 6078 Kid Curry Rd. Malta, MT 59538</p>	<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 1815</p> <p>Wesley &amp; Carmen Salveson 7875 Hwy 363 Malta, MT 59538</p>	<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 1822</p> <p>Craig Salzman 3412 Windmill Circle Billings, MT 59102</p>
<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 1839</p> <p>Michael Saucy 527 Mission Boulevard Santa Rosa, CA 95409</p>	<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 1846</p> <p>Justin Schaaf 908 3rd Ave South Glasgow, MT 59230</p>	<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 1853</p> <p>Paul Scharping 22406 107th Street Court East Buckley, WA 98321</p>
<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 1860</p> <p>Mike Schuldt Southeast Montana Livestock Association 2705 Sudlow Miles City, MT 59301</p>	<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 1877</p> <p>Cheryl M. Schuldt North Blaine County Cooperative State Grazing District PO Box 153 Miles City, MT 59301</p>	<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 1884</p> <p>John Schultz 7686 Elk Creek Road PO Box 219 Grass Range, MT 59032</p>
<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 1891</p> <p>Nate Schweber 29 S. 3rd Street Apt. 3B Brooklyn, NY 11249</p>	<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 1907</p> <p>Nate Schweber 510 West Mountain View Missoula, MT 59802</p>	<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 1914</p> <p>Montana Audubon Seaman Montana Audubon 324 Fuller Ave Ste N5 Helena, MT 59601</p>
<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 1921</p> <p>Nathan Sears 735 Crab Orchard Ct Roswell, GA 30076</p>	<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 1938</p> <p>F.E. Seel PO Box 334 Malta, MT 59538</p>	<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 1945</p> <p>Richard Seitz 405 N Montana Ave Helena, MT 59601</p>
<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 1952</p> <p>Cindy Selensky PO Box 137 BigTimber, MT 59011</p>	<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 1969</p> <p>Menno Sennesael 6316 W Greenwood Rd Spokane, WA 99224</p>	<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 1976</p> <p>Gaylord Sherwood 600 6th Street Eureka, MT 59917</p>

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<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 1983</p> <p>Marlene Sigman P.O. Box #4 Ringoes, NJ 8551</p>	<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 1990</p> <p>Doug Simanton PO Box 95 Malta, MT 59538</p>	<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 2003</p> <p>Patricia Simmons 357 Pine Creek Drive Bozeman, MT 59718</p>
<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 2010</p> <p>Theresa Slattery Budd-Falen Law Offices PO Box 346 300 East 18th Street Cheyenne, WY 82003</p>	<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 2027</p> <p>Mickey Smith 634 Rollins St Missoula, MT 59801</p>	<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 2034</p> <p>Bernadette Smith PO Box 68 Pryor, MT 59066</p>
<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 2041</p> <p>Susan Snyder 752 20th Rd. NW Choteau, MT 59422</p>	<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 2058</p> <p>Orvin Solberg PO Box 656 Malta, MT 59538</p>	<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 2065</p> <p>Sue Solberg PO BOX 1192 Malta, MT 59538</p>
<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 2072</p> <p>Richard Spotts 255 N 2790 E Saint George, UT 84790</p>	<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 2089</p> <p>Michele Stenglein PO Box 12 Opheim, MT 59250</p>	<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 2096</p> <p>John Stephenson-Love 300 Southridge Ct Great Falls, MT 59404</p>
<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 2102</p> <p>Dan Stevenson 1960 Survant Road Malta, MT 59538</p>	<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 2119</p> <p>Donald Stevenson 4528 Edward Ave Missoula, MT 59804</p>	<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 2126</p> <p>James Stilwell 3015 Nettie Street Butte, MT 59701</p>
<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 2133</p> <p>Gilles Stockton Montana Cattlemen's Association P.O. Box 536 Vaughn, MT 59487</p>	<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 2140</p> <p>Ron and Rose Stoneberg PO Box 37 Hinsdale, MT 59241</p>	<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 2157</p> <p>Greg and Alanna Strong 320 Minnesota Ave Whitefish, MT 59937</p>

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<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 2164</p> <p>Pat Stud 515 8th Ave W Roundup, MT 59072</p>	<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 2171</p> <p>Carl Stude 706 Perry Ridge Carbondale, CO 81623</p>	<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 2188</p> <p>Sharon Studt 25766 Oak Haven Court West Harrison, IN 47060</p>
<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 2195</p> <p>Anne Sturm P.O. Box 341 Barnesville, MD 20838</p>	<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 2201</p> <p>Patrick Swanson 8717 Capitol Avenue Omaha, NE 68114</p>	<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 2218</p> <p>Leonard Swenson 49 Riverside Dr. Glasgow, MT 59230</p>
<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 2225</p> <p>Trace Sweeney 131 West Manor Drive Lewistown, MT 59457</p>	<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 2232</p> <p>Leonard Swenson Wittmayer-Silver Dollar Grazing Association PO Box 1168 Glasgow, MT 59230</p>	<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 2249</p> <p>Christopher Tassava 1716 Sunset Drive Northfield, MN 55057</p>
<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 2256</p> <p>Warren and Lori Taylor 25208 US Hwy 191 S. Malta, MT 59538</p>	<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 2263</p> <p>Vivian Taylor 7729 Larb Creek Road Saco, MT 59261</p>	<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 2270</p> <p>Dennis Teske PO Box 687 591 Coal Creek Rd Terry, MT 59349</p>
<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 2287</p> <p>Joshua Theurer 309 S F St Livingston, MT 59047</p>	<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 2294</p> <p>Shawn Thomas Montana Department of Natural Resources &amp; Conser. 1539 Eleventh Ave Helena, MT</p>	<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 2300</p> <p>Denise Thompson Broadwater Conservation District 415 South Front Street Townsend, MT 59644</p>



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<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 2317</p> <p>Robert W Thompson 951 Whitlash Rd., Box 97 Whitlash, MT 59545</p>	<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 2324</p> <p>Ron Tibbetts Montana Grass Conservation Commission; Prairie County Cooperative State Grazing District PO Box 622 Terry, MT 59349</p>	<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 2331</p> <p>Troy Tripp 225 Walnut St Bremen, OH 43107</p>
<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 2348</p> <p>Gerald Tulley PO Box 175 Saco, MT 59261</p>	<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 2355</p> <p>Jason and Jamie Ulrich PO Box 1137 Malta, MT 59538</p>	<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 2362</p> <p>Rudy Urban 830 McMannamy Draw Kalispell, MT 59901</p>
<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 2379</p> <p>Dyrck Van Hying 6835 43 St. S.W. Great Falls, MT 59404</p>	<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 2386</p> <p>Mary VanBuskirk 1020 Park Ave. Whitefish, MT 59937</p>	<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 2393</p> <p>Catherine Vandemoer Montana Land and Water Alliance PO 1061 Polson, MT 59860</p>
<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 2409</p> <p>Alan Vanek 726 Warm Spring Lane Lewistown, MT 59457</p>	<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 2416</p> <p>Jim Vashro 1837 STAG LANE KALISPELL, MT 59901</p>	<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 2423</p> <p>Dale Veseth 22787 Midale Road Malta, MT 59538</p>
<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 2430</p> <p>Alan Van Voast PO Box 72 Turner, MT 59542</p>	<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 2447</p> <p>Gladys Walling PO Box 55 Winifred, MT 59489</p>	<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 2454</p> <p>Charles Wambeke PO BOX 863 Three Forks, MT 59752</p>
<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 2461</p> <p>John H Warner 421 Knapstad Rd</p>	<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 2478</p> <p>Tim Warner 796 Stonegate Drive</p>	<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 2485</p> <p>Paul &amp; Kayla Warren PO Box 1732</p>

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Sun River, MT 59483	Bozeman, MT 59715	Malta, MT 59538
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<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 2492</p> <p>Darrell &amp; Sandra Watkins 3488 Cora Creek Rd PO Box 223 RAYNESFORD, MT 59469-0223</p>	<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 2508</p> <p>Ron Wehr 245 Furnell Whitlash, MT 59545</p>	<p>CERTIFIED MAILING NO. 7021 2720 0002 5687 7510</p> <p>K.C. and Teri Weingart Swinging H Cattle Company PO Box 129 Winnett, MT 59087</p>
<p>CERTIFIED MAILING NO. 7021 2720 0002 5687 7527</p> <p>George Weurthner PO Box 8359 Bend, OR 97708</p>	<p>CERTIFIED MAILING NO. 7021 2720 0002 5687 7534</p> <p>Gordon Whirry 1912 4th Avenue North Great Falls, MT 59401</p>	<p>CERTIFIED MAILING NO. 7021 2720 0002 5687 7541</p> <p>Clint and Cathy Whitney Indian Butte Cooperative State Grazing District 73530 Hwy. 191 North Roy, MT 59471</p>
<p>CERTIFIED MAILING NO. 7021 2720 0002 5687 7558</p> <p>John Wiese 1450 Short Oil Rd MALTA, MT 59538</p>	<p>CERTIFIED MAILING NO. 7021 2720 0002 5687 7565</p> <p>Kenneth Wilcox 1209 T St. #3 Sacramento, CA 95811</p>	<p>CERTIFIED MAILING NO. 7021 2720 0002 5687 7572</p> <p>Farris Wilks 52 Headquarters Loop Grass Range, MT 59032</p>
<p>CERTIFIED MAILING NO. 7021 2720 0002 5687 7589</p> <p>David Willams 2731 Princeton St Butte, MT 59701</p>	<p>CERTIFIED MAILING NO. 7021 2720 0002 5687 7596</p> <p>Cynthia Willson Wildlife Photographer 2014 Evans Ave Cheyenne, WY 82001</p>	<p>CERTIFIED MAILING NO. 7021 2720 0002 5687 7602</p> <p>Jerry &amp; Dawn Wilson P.O. Box 1272 Malta, MT 59538</p>
<p>CERTIFIED MAILING NO. 7021 2720 0002 5687 7619</p> <p>Eric &amp; Delsi Witmer 5319 Kid Curry Rd Malta, MT 59538</p>	<p>CERTIFIED MAILING NO. 7021 2720 0002 5687 7626</p> <p>Don Woerner, DVM 1226 Allendale Road Laurel, MT 59044</p>	<p>CERTIFIED MAILING NO. 7021 2720 0002 5687 7633</p> <p>Brandon Wold 1425 Old Town Road Three Forks, MT 59752</p>
<p>CERTIFIED MAILING NO. 7021 2720 0002 5687 7640</p> <p>Twila Wolfe 3003 Altura Drive Missoula, MT 59802</p>	<p>CERTIFIED MAILING NO. 7021 2720 0002 5687 7657</p> <p>Raymond Yarrow 51975 LOST ELK LANE CHARLO, MT 59824</p>	<p>CERTIFIED MAILING NO. 7021 2720 0002 5687 7664</p> <p>Kay Roub Younkin 616 Billingsley Road Glasgow, MT 59230</p>

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<p>CERTIFIED MAILING NO. 7021 2720 0002 5687 7671</p> <p>Corey Zadik 185 LAKE FOREST DR ACWORTH, GA 30102</p>	<p>CERTIFIED MAILING NO. 7021 2720 0002 5687 7688</p> <p>Tina Zenzola 26382 Red Owl Trail Bigfork, MT 59911</p>	<p>CERTIFIED MAILING NO. 7021 2720 0002 5687 7695</p> <p>Montana Association of Conservation Districts 1101 11th Avenue Helena, MT 59601</p>
<p>CERTIFIED MAILING NO. 7021 2720 0002 5687 7701</p> <p>Phillips Conservation District 1120 Hwy 191 S.Ste 2 Malta, MT 59538</p>	<p>CERTIFIED MAILING NO. 7021 2720 0002 5687 7718</p> <p>C &amp; B Cooperative State Grazing District 980 Highway 323 Ekalaka, MT 59324</p>	<p>CERTIFIED MAILING NO. 7021 2720 0002 5687 7725</p> <p>Phillips County Commission PO Box 360 Malta, MT 59538</p>
<p>CERTIFIED MAILING NO. 7021 2720 0002 5687 7732</p> <p>Flathead Wildlife, Inc. PO Box 4 Kalispell, MT 59903</p>	<p>CERTIFIED MAILING NO. 7021 2720 0002 5687 7749</p> <p>North Valley Cooperative State Grazing District PO Box 422 Glasgow, MT 59230</p>	<p>CERTIFIED MAILING NO. 7021 2720 0002 5687 7763</p> <p>First Creek Ranch Inc. PO Box 48 Saco, MT 59261</p>
<p>CERTIFIED MAILING NO. 7021 2720 0002 5687 7770</p> <p>Penelope Mackey 982 Kjos Rd Malta, MT 59538</p>	<p>CERTIFIED MAILING NO. 7021 2720 0002 5687 7787</p> <p>Mike Fauth 110 MF Lane Opheim, MT 59250</p>	<p>CERTIFIED MAILING NO. 7021 2720 0002 5687 7794</p> <p>Jeff Neubauer 6918 NB Loop Wolf Point, MT 59201</p>
<p>CERTIFIED MAILING NO. 7021 2720 0002 5687 7800</p> <p>Darlene Kolczak 1818 Landusky Rd Zortman, MT 59546</p>	<p>CERTIFIED MAILING NO. 7021 2720 0002 5687 7817</p> <p>Linda Lien 1906 Camden Dr Billings, MT 59102</p>	<p>CERTIFIED MAILING NO. 7021 2720 0002 5687 7824</p> <p>Dan Duncan PO Box 694 Malta, MT 59538</p>
<p>CERTIFIED MAILING NO. 7021 2720 0002 5687 7831</p> <p>Kyle Mitchell</p>	<p>CERTIFIED MAILING NO. 7021 2720 0002 5687 7848</p> <p>Marcella McEwen PO Box 538</p>	<p>CERTIFIED MAILING NO. 7021 2720 0002 5687 7855</p> <p>Sally M Austin Harry Austin Limited Ptnrship</p>

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4787 Mitchell Road Dodson, MT 59524	Malta, MT 59538	PO Box 22 Whitewater, MT 59544
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<p>CERTIFIED MAILING NO. 7021 2720 0002 5687 7862</p> <p>Scott Cassel PO Box 772 Glasgow, MT 59230</p>	<p>CERTIFIED MAILING NO. 7021 2720 0002 5687 7879</p> <p>Robert Galt PO Box 1714 Malta, MT 5953</p>	<p>CERTIFIED MAILING NO. 7021 2720 0002 5687 7886</p> <p>Russell Osmundson PO Box 1455 Malta, MT 59538</p>
<p>CERTIFIED MAILING NO. 7021 2720 0002 5687 7893</p> <p>Mark &amp; Sarese Pankratz PO Box 100 Dodson, MT 59524</p>	<p>CERTIFIED MAILING NO. 7021 2720 0002 5687 7909</p> <p>Doug Osterman 590 First Avenue South #601 Seattle, WA 98104</p>	<p>CERTIFIED MAILING NO. 7021 2720 0002 5687 7916</p> <p>Roy &amp; Marilyn Taylor PO Box 1372 Malta, MT 59538</p>
<p>CERTIFIED MAILING NO. 7021 2720 0002 5687 7923</p> <p>Dusty Emond 7607 Emond Road Malta, MT 59538</p>	<p>CERTIFIED MAILING NO. 7021 2720 0002 5687 7930</p> <p>Carol Kienenberger PO Box 187 Dodson, MT 59524</p>	<p>CERTIFIED MAILING NO. 7021 2720 0002 5687 7947</p> <p>Jeff Darrah Montana Sportsmen for Fish &amp; Wildlife 837 Captivating Way Stevensville, MT 59870</p>
<p>CERTIFIED MAILING NO. 7021 2720 0002 5687 7954</p> <p>Stephen Mayernik 128 Lone Spring Rd. Stockett, MT 59480</p>	<p>CERTIFIED MAILING NO. 7021 2720 0002 5687 7961</p> <p>Cheryle Bliss 495 Twin Buttes Rd Sand Springs, MT 59077-9511</p>	<p>CERTIFIED MAILING NO. 7021 2720 0002 5687 7978</p> <p>Scott Seaton PO Box 243 Gardiner, MT 59030</p>
<p>CERTIFIED MAILING NO. 7021 2720 0002 5687 7985</p> <p>James &amp; Audrey Standish 450 N. Rossmore Ave. # 903 Los Angeles, CA 90004</p>	<p>CERTIFIED MAILING NO. 7021 2720 0002 5687 7992</p> <p>Patricia Helvey 6220 Elkhorn Rd Helena, MT 59602-9758</p>	<p>CERTIFIED MAILING NO. 7021 2720 0002 5687 8005</p> <p>Bab &amp; Mary Lou Young PO Box 208 Malta, MT 59538</p>
<p>CERTIFIED MAILING NO. 7021 2720 0002 5687 8012</p> <p>Ronald Fox FX Bar Ranch PO Box 96 Turner, MT 59542</p>	<p>CERTIFIED MAILING NO. 7021 2720 0002 5687 8029</p> <p>Jim Johnson 786 Castle Butte Rd. Lewistown, MT 59457</p>	<p>CERTIFIED MAILING NO. 7021 2720 0002 5687 8036</p> <p>Fergus County Commissioners 712 W Main St #210 Lewistown, MT 59457</p>

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<p>CERTIFIED MAILING NO. 7021 2720 0002 5687 8043</p> <p>Blaine County Commissioners Miles Hutton PO Box 278 Chinook, MT 59523</p>	<p>CERTIFIED MAILING NO. 7021 2720 0002 5687 8050</p> <p>McCone County Board of County Commissioners 1004 C Ave PO Box 199 Circle, MT 59215</p>	<p>CERTIFIED MAILING NO. 7022 0410 0001 9502 6360</p> <p>Megan Draheim 3065 Porter St NW Washington, DC 20008</p>
<p>CERTIFIED MAILING NO. 7021 2720 0002 5687 8067</p> <p>Office of the Governor Anita Milanovich State Capitol PO Box 200801 Helena, MT 59620-0801</p>	<p>CERTIFIED MAILING NO. 7021 2720 0002 5687 7756</p> <p>Willow Creek Coop. State Grazing District PO Box 422 Glasgow, MT 59230</p>	

Protesting Party	Protest Text	Response #	Protest Response
Doug & Jill Flament	<p>The APR is in direct violation of the Taylor Grazing Act of 1934 that stipulates the specific named animals that are considered livestock that are allowed to graze on the grazing allotments set up by this act. Only the animals listed in the Taylor Grazing Act are eligible to graze in these grazing allotments. Bison is not on the approved species list; there has not been any change or amendment to the original act, hence, the presence of bison on the grazing areas is illegal. The Congress of the United States is the only entity that can change the status of which animals are considered livestock, and to date, that has not occurred.</p>	1	<p>The regulations at 43 CFR §4100.0-5 define livestock as cattle, sheep, horses, burros, and goats. This definition was first added to the grazing regulations in 1978; the TGA did not expressly define livestock. However, the regulations at 43 CFR §4130.6-4 state 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 regulation was added to the grazing regulations at the same time as the definition of livestock in 1978.) The H-4130-1 handbook further clarifies that special grazing permits or leases authorizing grazing use by privately owned or controlled indigenous animals (including bison) may be issued at the discretion of the authorized officer. 43 CFR §4130.2: §4130.3-2 allows an authorized officer to specify other terms and conditions into a grazing permit which will assist in proper range management and orderly administration that includes specifying class of livestock and the kinds of indigenous animals authorized to graze under specific terms and conditions.</p> <p>The issue of whether bison may qualify as "livestock" for which grazing permits may be issued under the TGA was addressed by the Department of the Interior through the Office of Hearings and Appeals Administrative Law Judge Harvey C. Sweitzer in a Decision issued on September 25, 1976, in the case of Hampton Sheep Co. v. Bureau of Land Management, Docket No. Wyoming 1-71-1. That Decision recognized that bison or other animals, which would ordinarily be categorized as wildlife, may be considered "livestock" for purposes of issuing grazing permits under the TGA when they are treated in substantial respects as livestock and have characteristics in common with livestock.</p> <p>The final decision is consistent with the approved Hi Line District Office Resource Management Plan (RMP). (EA: Section 1.3.) The allotments included in the proposed action are located within the boundary of the RMP. Responding to an application for changes to permit terms and conditions, changing the seasons of use in certain allotments, modifying terms and conditions of grazing permits, changing classes of livestock, and modifying range improvements are all standard actions incorporated in the RMP. The final decision is consistent with the direction found on page 3-25 and 3-26 of the ARMP, which states: "Adjustments to livestock management practices or livestock numbers including increases or decreases will be made based on results of monitoring studies, rangeland health assessments, allotment evaluations, and through an environmental review process. Adjustments to meet seasonal Sage-Grouse habitat requirements could include: season or timing of use; numbers of livestock (includes temporary non-use or livestock removal); distribution of livestock use; intensity of use; and type of livestock (e.g., cattle, sheep, horses, bison, llamas, alpacas and goats).</p>
Fergus County Commissioners	<p>Language chosen by the agency in relationship to this permit such as "bison and/or cattle" or "privately owned indigenous livestock" blurs the distinction between domestic livestock grazing permitted under the general grazing regulations per 4100.0-5 and indigenous animal grazing permitted at 4130.6-4. Because livestock is explicitly defined in Federal Code the agency does not have the discretion to redefine livestock in a permitting process and blur distinctions between livestock permits and special use permits within the boundary of TGA Federally Reserved Grazing Districts. The special grazing permits are analogous to the conditional use permits found in permit regulations for land use in that they function as exceptions to the general rules of how land may be used under laws governing the region of concern.</p>	2	<p>Grazing regulations in 43 CFR Part 4100 refer to "indigenous animals" or "privately owned or controlled indigenous animals". The EA refers to domestic bison from both a biological and rangeland management standpoint as specified in 43 CFR Part 4100. The terms "bison" and "domestic indigenous livestock" are used interchangeably. The final decision addresses the management of domestic bison, which would be pastured by authorized permittees and does not pertain to wild herds. A distinction is made between bison that are privately owned and considered livestock and those that are considered wildlife (publicly owned) that fall under the jurisdiction of the State of Montana. Authorization of bison grazing through a grazing permit identifies bison as domestic and provides for management and control of these livestock.</p> <p>Under 43 CFR §4130.3-2 an authorized officer may specify the kinds of indigenous animals authorized to graze under specific terms and conditions for a grazing permit issued under 43 CFR §4130.2. Other authorities (43 CFR §4130.6) can also be issued to authorize grazing use by privately owned or controlled indigenous animals. Other authorities, specifically special grazing permits (43 CFR §4130.6-4) are not administratively unique from any other grazing permit or lease. As such, there is no distinction in BLM's Rangeland Administration permitting system (RAS) to issue special grazing permits separate from other types of permits and leases and the authority is seldom used. While there are many similarities, 43 CFR §4130.6-4 states that these other grazing authorizations are discretionary and have no priority for renewal, and cannot be transferred or assigned. Provisions under §4130.2 are more applicable to permits contained in the final decision because the permittees meet the mandatory qualifications and maintain established grazing preference through demonstrated control of associated base properties. This authority allows authorization of both cattle and cattle/indigenous (C/I) category that better responds to the permittee's proposal for both kinds of livestock. Authorizations contained in the final decision allow for phased implementation of the proposed action and fully processes and renews permits, as specified in the purpose and need section of the EA. Permit issuance in the final decision best ensures management of bison and cattle to assist in the orderly administration and use of the public rangelands (43 CFR §4100.0-2, 43 CFR §4130.2-2).</p> <p>Prior to, and subsequent to, the 1978 regulation re-write, which added the provision for grazing permits or leases for authorizing grazing use by privately owned or controlled indigenous livestock, the BLM has approved grazing permits and leases for bison. Bison have been approved as a kind of livestock in other allotments in Montana, North Dakota, South Dakota, Wyoming, Colorado, and New Mexico.</p> <p>The final decision recognizes that bison may be considered "livestock" for purposes of issuing grazing permits under the TGA when they are treated in substantial respects as livestock and have characteristics in common with livestock. The final decision addresses the management of domestic bison, which would be pastured by authorized permittees and does not pertain to wild herds. The final decision is also in conformance with the HiLine RMP (2015) which contains decisions that discuss bison in relation to permitting and multiple-management. Grazing regulations in 43 CFR Part 4100 do not contain reference or authority for issuing conditional use permits. See further discussions in Response #1.</p>

Protesting Party	Protest Text	Response #	Protest Response
Fergus County Commissioners	<p>The proposed decision is in error because it fails to reference the pertinent terms, conditions, and the provisions of applicable regulations (43 CFR 4160.1(b); H-1790-1 - NEPAH 8.5.1). Furthermore, when appropriate, "decisions shall state the alleged violations of specific terms and conditions and provisions of these regulations alleged to have been violated."</p> <p>43 CFR 4160.1(b) [states:] "Proposed decisions shall state the reasons for the action and shall reference the pertinent terms, conditions and the provisions of applicable regulations. As appropriate, decisions shall state the alleged violations of specific terms and conditions and provisions of these regulations alleged to have been violated. . ."; H-1790-1 NEPAH 8.5.1 "Identify compliance with major laws pertinent to the decision..."</p>	3	<p>Terms and Conditions, such as kind and number of livestock, period-of-use, grazing systems and amount of use are specified in the final decision for each allotment. These "Mandatory terms and conditions" as well as all other terms and conditions and stipulations for use are included in the final decision and have been determined to be appropriate to achieve the management and resource condition objectives necessary to ensure conformance with the provisions of subpart 4180. Pages 6-10 of the final decision contains reasons for the action. A list of authorities specific to the final decision is included on page 11 of the final decision. The remaining portions of 43 CFR 4160.1(b) refer to violations of specific terms and conditions which is not applicable to the final decision. Section 1.4 of the APR Change of Use Environmental Assessment (March 2022) examined the relationship to statutes, regulations, other plans and other NEPA documents.</p>
Fergus County Commissioners	<p>The proposed decision is in error because it excludes from its Terms and Conditions/Stipulations section, 43 CFR 4130.6: 4130.6-4; 4100.0-5 domestic livestock; all of which represent regulatory stipulations pertaining to permits for privately owned indigenous animals distinct from, and nonapplicable to general permits for domestic livestock per 4100.0-5. The proposed decision is in error because its list of authorities for permitting these animals excludes the above cited Code of Federal Regulations</p>	4	<p>The purpose and need of the proposed action was to respond to applications in order to fully process and renew permits to graze cattle and bison on BLM-administered land under the authority of the Taylor Grazing Act (TGA) and Federal Land Policy and Management Act (FLPMA). The proposal contains a request in the kind of livestock from Cattle to Cattle and domestic indigenous animals. Terms and conditions of grazing authorizations were also necessary to ensure authorized grazing does not inhibit public lands from meeting the Standards of Rangeland Health (Standards) and conform to the Guidelines for Livestock Grazing Management (Guidelines). The proposal to graze domestic indigenous animals is consistent with the authorities in the Taylor Grazing Act. The grazing regulations at 43 CFR §4110.1 require that an applicant own or control base property, and be a corporation authorized to conduct business in the State in which the grazing use is sought. APR is a corporation that is in good standing with the Montana Secretary of State, and it owns the base property to which the preference for the associated allotments is attached. The final decision is in conformance with 43 CFR 4130.2; 4130.3-2 which allows an authorized officer to specify other terms and conditions into a grazing permit which will assist in proper range management and orderly administration that includes specifying class of livestock and the kinds of indigenous animals authorized to graze under specific terms and conditions. See response #2 for additional discussion.</p>
Fergus County Commissioners	<p>The proposed decision and EA/FONSI are in error because they read into the grazing regulations language that is not there. The agency opted to use the term privately owned indigenous livestock which appears nowhere in the regulations. The term in federal code is privately owned indigenous animals distinct from livestock defined at 4100.0-5, hence the need for a special use permit which functions as an exception to the rule as shown at 4130.6.</p>	5	<p>See responses #1 - #4.</p>
Fergus County Commissioners	<p>The proposed decision and EA/FONSI are in error because they were developed with comments which were submitted for the November 2017 application which was withdrawn December of 2019 without further comment or input on the significantly scaled down request.</p>	6	<p>Previous applications to which this protest refers are not currently pending, and the future conversion of lands leased to APR from cattle to cattle or bison grazing is, at present, speculative. However, such reasonably foreseeable actions have been considered in the EA. In Section 3.3.2 of the EA, Past, Present, and Reasonably Foreseeable Future Actions, it is made clear that the potential exists for future conversion of lands leased to APR from cattle to cattle or bison grazing on federal and nonfederal lands. The EA specifically states that in a previous, withdrawn proposal submitted on November 20, 2017, APR proposed the BLM issue a 10-year grazing permit for cattle and/or indigenous animals (bison) for 31,893 AUMs of federal grazing permitted use on 20 BLM-administered allotments and lists those allotments. It is also made clear that, in addition to the seven BLM-administered allotments being considered in the EA, APR currently operates on other federal and nonfederal ranch lands.</p> <p>Effects from such reasonably foreseeable future actions on lands considered in the current proposal are analyzed under cumulative impacts for each resource area. When considered within the context of regional plans and actions, including grazing by APR on other federal and nonfederal ranch lands in the four surrounding counties within which APR currently holds title to property, the proposed action would contribute incrementally to cumulative effects but would not result in considerable cumulative impacts on resources. It is reasonable to assume that APR would continue to remove interior fences across private lands they manage and convert livestock type from cattle to cattle or bison. Other past, present, or reasonably foreseeable actions include modifications to the landscape occurring within the grazing allotments (such as, range improvement project construction in the vicinity), and continued livestock grazing authorizations, including additional conversion from cattle grazing to bison pasturing on adjacent federal and nonfederal lands. However, these actions are not part of the current proposed action submitted to BLM. No detailed requests or proposals have been submitted to BLM that would allow for further analysis of direct and indirect effects. While external scoping for an EA is discretionary, BLM utilized external scoping to coordinate needs with other agencies; refine issues through public, tribal and agency feedback on preliminary issues; and identify new issues and possible alternatives. BLM announced a public scoping period from April 9 to May 9, 2018 which was extended through June 11, 2018. Four open-house meetings were held in four communities in North-Central Montana. Nearly 2,500 submissions were received. Based on those comments, a total of 34 issue statements were developed. On September 24, 2019, APR submitted a revised proposal to address public concerns. The Summary of Input Received During Public Scoping Report (December 2018) sufficiently identified issues and alternatives necessary to prepare a preliminary EA. Throughout the planning and preparation process of the EA, BLM continually refined, modified and included new issue statements based on internal and public feedback. Original commenters were further involved in the development of the final decision. Given the level of public interest in the proposal, BLM initiated an increased effort to engage local and state cooperators and the interested public to the greatest extent possible. Consultation, cooperation and coordination requirements were met, or exceeded prior to issuance of the Proposed Decision in accordance with 40 CFR 1506.6, 40 CFR 1500.3(b), 40 CFR §1500.2(d), and 40 CFR §1406.6. The BLM provided a public scoping period, four public scoping meetings and an extended public comment period on the preliminary EA with an associated public meeting where further public comment was accepted. Supporting documents, project updates, contact information and opportunities to participate were available on BLM's ePlanning website.</p>



Protesting Party	Protest Text	Response #	Protest Response
Fergus County Commissioners	The proposed decision and EA/FONSI are in error because they have broken down the APR initiative into small component parts violating 40 CFR 1508.27(6)(7) which clearly states "significance cannot be avoided by breaking an action down into small component parts."	7	<p>Previous applications to which this protest refers are not currently pending, and the future conversion of lands leased to APR from cattle to cattle or bison grazing is, at present, speculative. However, such reasonably foreseeable actions have been considered in the EA. In Section 3.3.2 of the EA, Past, Present, and Reasonably Foreseeable Future Actions, it is made clear that the potential exists for future conversion of lands leased to APR from cattle to cattle or bison grazing on federal and nonfederal lands. The EA specifically states that in a previous, withdrawn proposal submitted on November 20, 2017, APR proposed the BLM issue a 10-year grazing permit for cattle and/or indigenous animals (bison) for 31,893 AUMs of federal grazing permitted use on 20 BLM-administered allotments and lists those allotments. It is also made clear that, in addition to the seven BLM-administered allotments being considered in the EA, APR currently operates on other federal and nonfederal ranch lands.</p> <p>Effects from such reasonably foreseeable future actions on lands considered in the current proposal are analyzed under cumulative impacts for each resource area. When considered within the context of regional plans and actions, including grazing by APR on other federal and nonfederal ranch lands in the four surrounding counties within which APR currently holds title to property, the proposed action would contribute incrementally to cumulative effects but would not result in considerable cumulative impacts on resources. It is reasonable to assume that APR would continue to remove interior fences across private lands they manage and convert livestock type from cattle to cattle or bison. Other past, present, or reasonably foreseeable actions include modifications to the landscape occurring within the grazing allotments (such as, range improvement project construction in the vicinity), and continued livestock grazing authorizations, including additional conversion from cattle grazing to bison pasturing on adjacent federal and nonfederal lands. However, these actions are not part of the current proposed action submitted to BLM. No detailed requests or proposals have been submitted to BLM that would allow for further analysis of direct and indirect effects.</p>
James Johnson	This allows exactly what the Taylor Grazing Act was trying to prevent, allowing the land to be captured by the regulated interests of the APR.	8	<p>BLM issues grazing permits in accordance with 43 CFR §4130.2 ("Grazing permits or leases"). Moreover, under 43 CFR §4130.3-2 ("Other terms and conditions"), BLM may specify in grazing permits or leases other terms and conditions which will assist in achieving management objectives, provide for proper range management or assist in the orderly administration of the public rangelands. The regulations at 43 CFR §4130.6-4 ("Special grazing permits or leases") state 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. The H-4130-1 handbook further clarifies that special grazing permits or leases authorizing grazing use by privately owned or controlled indigenous animals (including bison) will be issued at the discretion of the authorized officer.</p> <p>Because the grazing authorizations are being issued to a qualified applicant, APR, the permits may specify types of use, levels of use authorized, and appropriate terms and conditions. It should be noted, however, that BLM only retains authority over grazing terms and conditions as long as bison are regulated under a grazing permit. Such authorities would not apply if the animals were classified as wildlife. The stated goal of the Taylor Grazing Act was to "stop injury to the public grazing lands by preventing overgrazing and soil deterioration; to provide for their orderly use, improvement, and development; to stabilize the livestock industry dependent upon the public range and for other purposes." APR is eligible to hold grazing permits. The regulation at 43 CFR §4110.1(a) was challenged by the Public Lands Council in the case Supreme Court case 98-1991 (Public Lands Council, et al. Petitioners v. Bruce Babbitt, Secretary of the Interior, et al.) That regulation requires that an applicant own or control base property, and (under part (c)) be a corporation authorized to conduct business in the State in which the grazing use is sought. APR meets these requirements. The opinion from the Supreme Court states on page 16, "...The statute continues to limit the Secretary's authorization to issue permits to "bona fide settlers, residents, and other stock owners." 43 U. S. C. §315b (emphasis added)..." and on page 17, "...The legislative history to which the ranchers point shows that Congress expected that ordinarily permit holders would be ranchers, who do engage in the livestock business, but does not show any such absolute requirement..." See Response #11 for additional discussion.</p>
McCone County Commissioners	The plan does not recognize the potential damage to Sage Grouse breeding grounds.	9	<p>In Section 3.4.1, the EA describes how the removal or partial removal of interior fences would decrease wildlife habitat fragmentation by reducing barriers to movement of big game and also improving habitat for special status species such as Greater Sage-Grouse that rely on large and contiguous areas of habitat to support home ranges and/or migration routes. To the extent that any fencing is being converted to wildlife friendly fencing, such change would be a benefit to wildlife. Fence removal would also decrease the availability of perches for avian predators in the area, which would potentially decrease mortality of Greater Sage-Grouse and other special status wildlife species that are vulnerable to avian predation. Furthermore, because bison tend to graze in patches, the result is a patchy distribution of vegetation that encourages plant species diversity by allowing forbs to flourish. Species such as Greater Sage Grouse will benefit from an increase in native forbs. Because bison tend to spend less time and forage greater distances from water, improvements to riparian vegetation and riparian function will also be seen. The final decision also includes the following term and condition specific to management of habitat for Greater Sage-Grouse: <i>If on-the-ground monitoring determines that livestock grazing has prevented suitable habitat conditions for Greater Sage-Grouse on more than half of three or more than three key monitoring sites within an allotment, livestock numbers will be reduced by 10 percent. They may be reduced another 10 percent the following year if habitat conditions remain unimproved. Livestock numbers would only be restored to full numbers when a management action plan is in place to correct the reason(s) for the failure. Desired Conditions for Greater Sage-Grouse Habitat are found in Table 2.3-2 of the HiLine RMP. Per Appendix B of the HiLine RMP (BLM 2015a), all fences within 1.2 miles of Greater Sage-Grouse leks will also be marked to decrease the chance of Greater Sage-Grouse collisions.</i></p>

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McCone County Commissioners	[...] we think it is important to use approved grazing practices that are utilized by most producers. We think allowing year round grazing will lead to over grazing and increased erosion. The improved exterior fences will decrease the ability for deer and antelope to migrate along traditional routes. Allowing and electric fence will negatively impact wildlife that live in that area. The improved exterior fences will decrease the ability for deer and antelope to migrate along traditional routes. Allowing the removal of interior fences will enable the bison to graze just the plant life that they prefer. It cost a great deal of money to build the fences that will be removed so if they are removed, then the AP should be required to pay for those improvements that they remove. The fences are government property in many cases so when they are removed they should be offered for sale at public auction.	10	<p>BLM employed the use of best-available science in the development of analysis contained in the EA.</p> <p>On Page 3-16, the EA states that modifying or reconstructing 79.6 miles of fencing (43.9 miles reconstructed and 35.7 miles reconstructed as electric only) would provide for the secure containment of bison within designated pastures and adequate separation from adjacent allotments. Further beneficial effects are described on Page 3-10, where the analysis finds that overall fencing changes would decrease wildlife habitat fragmentation, facilitate wildlife passage, improve big game migration and also improve habitat for special status species, such as Greater Sage-Grouse, that rely on large and contiguous areas of habitat to support home ranges and/or migration routes. Pronghorn choose seasonal ranges with lower fence densities (See EA, pg. 4, Appendix B). To the extent that any fencing is being converted to wildlife friendly fencing, such change would be a benefit to wildlife. As stated in the EA:</p> <p>"Modifying or reconstructing 79.6 miles of fencing (43.9 miles reconstructed and 35.7 miles reconstructed as electric only) to meet specific standards according to MFWP's wildlife friendly standards (Appendix B, Fence Design and Maintenance) would improve the condition of big game migration habitat because, although standards for fencing have been in place for many years, modifications and enhancements would facilitate wildlife passage (Paige 2012)." Removal of fences will occur in accordance with 43 CFR 4120.3-6. Cost-share of range improvements varies by project. Salvage will be addressed on a case-by case basis depending on contributions and condition of the project. Decision on abandonment and the identification of who is responsible for salvage and rehabilitation must be made on a project by project basis. (pg IV-8; H1740-1). BLM is required to monitor allotments for land health standards. If any allotment is determined to not be meeting the standards for rangeland health, changes would be made to bring it back into compliance. Changes could include additional fencing, rest-rotation practices, or reduction in AUMs. Specific terms and conditions are being added to the permits to ensure conformance with Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration (43 CFR §4130.3-1(c)). Other terms and conditions are specified in the grazing permits that assist in achieving management objectives and proper range management.</p>
Missouri River Stewards	Each bison grazing application approved for APR by BLM underwrites the ability of APR to gain operational control over huge tracts of land to create the largest nature reserve in the continental United States. There is no authority for federal agencies to directly facilitate such an outrageous undertaking by a non-profit organization. The issue at hand is not about bison grazing permits: it's about acceding millions of acres of public land for use by a private organization to fulfill its agenda for the region.	11	<p>BLM issues grazing permits in accordance with 43 CFR §4130.2 ("Grazing permits or leases"). Moreover, under 43 CFR §4130.3-2 ("Other terms and conditions"), BLM may specify in grazing permits or leases other terms and conditions which will assist in achieving management objectives, provide for proper range management or assist in the orderly administration of the public rangelands. The regulations at 43 CFR §4130.6-4 ("Special grazing permits or leases") state 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. The H-4130-1 handbook further clarifies that special grazing permits or leases authorizing grazing use by privately owned or controlled indigenous animals (including bison) may be issued at the discretion of the authorized officer. Because the grazing authorizations are being issued to a qualified applicant, APR, the permits may specify types of use, levels of use authorized, and appropriate terms and conditions. It should be noted, however, that BLM only retains authority over grazing terms and conditions as long as bison are regulated under a grazing permit. Such authorities would not apply if the animals were classified as wildlife. The stated goal of the Taylor Grazing Act was to "stop injury to the public grazing lands by preventing overgrazing and soil deterioration; to provide for their orderly use, improvement, and development; to stabilize the livestock industry dependent upon the public range and for other purposes." APR is eligible to hold grazing permits. The regulation at 43 CFR §4110.1(a) was one of a number of items challenged by the Public Lands Council in the Supreme Court case, Public Lands Council v. Babbitt, 529 U.S. 728. The Public Lands Council's challenge to the qualifications rule stemmed from changes to that applicable regulation in 1995 that eliminated an earlier requirement that a permit applicant be "engaged in the livestock business". That regulation today, as modified, requires that an applicant own or control base property, and (under part (c)) be a corporation authorized to conduct business in the State in which the grazing use is sought. APR meets these requirements. In Babbitt, the Supreme Court confirmed that the both the TGA and the regulations constrain the Secretary's discretion in issuing permits. They determined that the TGA continues to limit the Secretary's authorization to issue permits to "bona fide settlers, residents, and other stock owners" and upheld the change in the regulation and determined that "[t]he legislative history to which the ranchers point shows that congress expected that ordinarily permit holders would be ranchers, who do engage in the livestock business, but does not show any such absolute requirement." Id. at 746. There is no authority for BLM to evaluate the goals of permittees to determine eligibility to hold a grazing permit. Regulations found in 43 CFR Part 4100 contain no further requirements for an applicant to provide production records, or profitability performance information, of the livestock herd that will be grazing on the BLM allotment(s). When considered within the context of regional plans and actions, including grazing by APR on other federal and nonfederal ranch lands in the four surrounding counties within which APR currently holds title to property, the proposed action would contribute incrementally to cumulative effects but would not result in considerable cumulative impacts on resources. It is reasonable to assume that APR would continue to remove interior fences across private lands they manage and convert livestock type from cattle to cattle or bison. Other past, present, or reasonably foreseeable actions include modifications to the landscape occurring within the grazing allotments (such as, range improvement project construction in the vicinity), and continued livestock grazing authorizations, including additional conversion from cattle grazing to bison pasturing on adjacent federal and nonfederal lands. However, these actions are not part of the current proposed action submitted to BLM. No detailed requests or proposals have been submitted to BLM that would allow for further analysis of direct and indirect effects.</p>
Missouri River Stewards	APR's stated mission can only be achieved by its reliance on BLM's approval of its bison grazing requests. Because DOI has published its interest in collaborating with private land owners on wild bison restoration, BLM's proposed approval of APR's grazing request is consistent with DOI's announced bison restoration goals in Montana, despite legal objections to such approvals.	12	<p>BLM issues grazing permits in accordance with 43 CFR §4130.2 ("Grazing permits or leases"). Moreover, under 43 CFR §4130.3-2 ("Other terms and conditions"), BLM may specify in grazing permits or leases other terms and conditions which will assist in achieving management objectives, provide for proper range management or assist in the orderly administration of the public rangelands. The regulations at 43 CFR §4130.6-4 ("Special grazing permits or leases") state 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. The H-4130-1 handbook further clarifies that special grazing permits or leases authorizing grazing use by privately owned or controlled indigenous animals (including bison) may be issued at the discretion of the authorized officer.</p> <p>Because the grazing authorizations are being issued to a qualified applicant, APR, the permits may specify types of use, levels of use authorized, and appropriate terms and conditions. It should be noted, however, that BLM only retains authority over grazing terms and conditions as long as bison are regulated under a grazing permit. Such authorities would not apply if the animals were classified as wildlife. See Response #11 for additional discussion.</p>

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Missouri River Stewards	APR's original grazing application of November 20, 2017 for bison grazing on 18 allotments spanning four counties was withdrawn on September 24, 2019 and a revised grazing application was submitted for bison grazing on seven allotments in Phillips County. The ensuing public scoping comments were responsive to APR's November 20, 2017 grazing request, yet the BLM continued to process the EA based on APR's September 24, 2019 revised request that the public could not comment on because the comment period closed June 11, 2018. The scaled back grazing application by APR of September 24, 2019 is an unapologetic attempt by APR to avoid a significance finding by BLM by breaking down the action into small component parts in violation of 40 CFR 1508.27(b)(7).	13	See Response #7.
Missouri River Stewards	BLM erred in that it should have returned APR grazing proposal without action because it was withdrawn and BLM should have terminated the EA process upon receipt of APR's withdrawal request.	14	The proposed action is consistent with the approved Hi Line District Office Resource Management Plan (RMP). (See section 1.3.) The allotments included in the proposed action are located within the boundary of the RMP. Responding to an application for changes to permit terms and conditions, changing the seasons of use in certain allotments, modifying terms and conditions of grazing permits, changing classes of livestock, and modifying range improvements are all standard actions incorporated in the RMP. Consultation, cooperation and coordination with affected permittees is a requirement of Grazing Regulations (43 CFR Part 4100) that commonly result in modification, refinement or amending proposals and applications to ensure compatibility with resource and other management and administrative objectives.
Missouri River Stewards	BLM is derelict in its duties in that it continued to process APR's revised grazing proposal for seven allotments but that September 2019 revised request was not known to the public and the scoping period closed on June 11, 2018. BLM conveniently overlooks this error contending that it distilled down the 2,497 public scoping comments and used only those comments that applied to the seven allotments. Again, the public had no clue as to what issues the BLM used to develop the EA because a revised scoping report was never published.	15	APR's revised proposal was published to ePlanning on October 22, 2019. See Response #6 for further discussion.
Missouri River Stewards	The provisions of 43 CFR 4100.0-5 and 43 CFR 4130.6-4 clearly defines and makes a statutory distinction between livestock (cattle, sheep, horses, burros and goats) and indigenous species defined as native wildlife species that are privately owned or controlled as captive animals. It is inexplicable that BLM fails to reference in its EA/FONSI documents either one of these key statutory CFR's.	16	See Responses #1-#4.
Missouri River Stewards	Because bison are an indigenous species, the grazing applicant must apply for SPECIAL GRAZING PERMITS OR LEASES under the provisions 43 CFR 4130.6-4. That has not happened. [...] Further, 43 CFR 4130.6-4 provides that under special circumstances indigenous species may be authorized to graze public land but the authorizing officer must ensure such an approval is consistent with multiple-use objectives. The EA presents no evidence that such a compatibility determination was ever made by BLM. Again, BLM circumvents 43 CFR 4130.6-4 by making a spurious claim that bison are a "domestic indigenous species" to be managed the same as cattle.	17	See Responses #1-#4.

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MT Governors Office	As previously mentioned, there is no acknowledgement in the EA that several of the Allotments are governed by AMPs. While AMPs can certainly change, it would be important for the agency in this circumstance to 1) acknowledge their existence, 2) address how they govern current land management practices on the Allotment, 3) explain how AMP land management prescriptions were chosen and the benefit they provided to the permittee and the resource, and 4) analyze whether the proposed deviation from the AMP principles are in keeping with BLM's mandates [...] Several of the allotments at issue have historically been managed in accordance with an AMP. These AMPs contained information and goals specific to wildlife management and habitat on the allotments. The EA does not mention these AMPs. There is no discussion as to whether AMP goals have changed and, if so, why. A complete EA would include this analysis [...] the DEA and FONSI lacked discussion of historic AMPs, assessment of how the proposed alternative differs from historic AMPs, and analysis of impacts created from such a change.	18	An Allotment Management Plan (AMP) is a local plan for managing resource uses and values to achieve specific objectives. Activity plans may serve as a functional equivalent to Allotment Management Plans (43 CFR §4120.2). The final decision prescribes the manner in, and extent to, which livestock operations will be conducted in order to meet the multiple-use, and other needs and objectives. BLM will continue to conduct compliance inspections and monitor conditions within all allotments, which are currently meeting land health standards. Moreover, the authorized officer may modify terms and conditions of the permit or lease when the grazing use or related management practices are not meeting the land use plan, allotment management plan or other activity plan. For the purposes of the BLM NEPA analysis, AMPs were not specifically analyzed as an issue because historical AMPs, which have been maintained to varying degrees, do not contain relevant indicators necessary to make a reasoned choice between alternatives. Provisions of AMPs, or a functional equivalent, are contained in the terms and conditions of grazing permits. Environmental effects of those terms and conditions measure against the baseline conditions existing on these allotments have been fully analyzed in Chapter 3 of the EA. Alternative A represents the current management and conditions that would persist if the proposal were not approved which includes existing AMPs.
MT Governors Office	[...] removal [of rangeland improvements] runs contrary to federal authorities, specifically the Taylor Grazing Act, Federal Land Policy and Management Act, and the Public Rangelands Improvement Act	19	The BLM retains authority for the adjustment of range improvement projects. Under §4120.3-1(a) ("Conditions of Range Improvements"), any permittee or lessee may apply for a range improvement permit to install, use, maintain, and/or modify removable range improvements that are needed to achieve management objectives for the allotment in which the permit or lease is held. Such range improvement permits are issued at the discretion of the authorized officer. The regulations specify under § 4120.3-1(b) ("Conditions for range improvements") that prior to installing, using, maintaining, and/or modifying range improvements on the public lands, permittees or lessees shall have entered into a cooperative range improvement agreement with the Bureau of Land Management or must have an approved range improvement permit.
MT Governors Office	The EA is not clear to what extent bison and cattle might be mixed on the allotments. If both were present, interior fence removals justified or motivated by a land use pattern exhibited by bison may not address a different tendency for cattle. The EA points to different selection by bison and cattle for riparian habitats. In this context, adjustments to interior fences that make riparian areas more vulnerable to grazing would be misguided if cattle were also present. For wildlife and other reasons, healthy riparian habitats are high value landscape features.	20	Implementing the final decision will authorize a change in season-of-use and kind of livestock use from cattle to cattle and/or bison. While there are differences in foraging behavior between cattle and bison (See Page 3-30, the EA), the EA analyzes effects of both kinds of livestock and discloses those differences. The final decision contains terms and conditions specifying grazing management systems that apply to both cattle and bison. Levels of permitted use and livestock distribution patterns will be further refined by subsequent monitoring and allotment evaluations. Adjustments to range improvement projects, including internal fencing, will be made in accordance with provisions contained in 43 CFR §4120.3. BLM is required to monitor allotments for land health standards. If any allotment is determined to not be meeting the standards for rangeland health, changes would be made to bring it back into compliance. Changes could include additional fencing, rest-rotation practices, or reduction in AUMs. Specific terms and conditions are being added to the permits to ensure conformance with Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration (43 CFR §4130.3-1(c)). Other terms and conditions are specified in the grazing permits that assist in achieving management objectives and proper range management.
Roger & Robin Peters	The socioeconomical impacts have never been addressed or studied to show the impacts these changes have on our communities and state. If there are 7,969 AUMs taken out of production that is nearly \$1.5 million/yr of income not taxed that supports our communities and state leaving the rest of us to make up that revenue. Because of their "non-profit" status, they pay no income taxes on their entire operation.	21	The socio-economic analysis on pages 3-36 to 3-45 of the EA found no significant impacts would result from the action alternatives. Additionally, the current proposal from APR would change 7,697 AUMs from cattle to cattle or bison. According to the 2017 National Agricultural Statistical Service Census of Agriculture, Phillips County has 51,502 beef cattle. The annual requirement for that number of cattle is approximately 618,024 AUMs of forage or equivalent. If all AUMs on BLM allotments authorized to APR were consumed by bison, it would amount to 1.25% of the forage in Phillips County. Tax status and revenues are outside the scope of the analysis and final decision.
Roger & Robin Peters	There is NOT a fence they can build to allow wildlife passage while holding a bison. Wildlife friendly fences are a maximum of 42" high and the bottom wire is 18" off the ground to allow antelope under. How is that going to keep bison in? I have asked this over and over in the past years. Not one BLM official has answered this. Double cattleguards are not wildlife friendly. Why is it that every other private bison ranch has 8 ft high, woven wire fencing to keep their bison contained but mysteriously APR's bison will stay put with a 42" barbed wire fence?	22	BLM employed the use of best-available science in the development of analysis contained in the EA. On Page 3-16, the EA states that modifying or reconstructing 79.6 miles of fencing (43.9 miles reconstructed and 35.7 miles reconstructed as electric only) would provide for the secure containment of bison within designated pastures and adequate separation from adjacent allotments. This constitutes a beneficial impact to common allotment management. Further beneficial effects are described on Page 3-10, where the analysis finds that fencing would decrease wildlife habitat fragmentation, facilitate wildlife passage, improve big game migration and also improve habitat for special status species, such as Greater Sage-Grouse, that rely on large and contiguous areas of habitat to support home ranges and/or migration routes. To the extent that any fencing is being converted to wildlife friendly fencing, such change would be a benefit to wildlife As stated in the EA: "Modifying or reconstructing 79.6 miles of fencing (43.9 miles reconstructed and 35.7 miles reconstructed as electric only) to meet specific standards according to MFWP's wildlife friendly standards (Appendix B, Fence Design and Maintenance) would improve the condition of big game migration habitat because, although standards for fencing have been in place for many years, modifications and enhancements would facilitate wildlife passage (Paige 2012)." As is stated on page 3-14 of the EA, properly constructed and maintained electrified 3-, 4-, and 5-wire high-tensile fencing is highly effective in containing captive bison herds. When evaluating a fence's ability to contain domestic bison, consideration is given to the ability of the herd to access the proper quality and quantity of food and water (MFWP 2012). Appendix B, pg. 24 contains additional information about bison containment. Like all permittees, APR is required to keep livestock contained within pastures to ensure safe containment for 3-wire high-tensile electric fence.
Roger & Robin Peters	Livestock is defined by the Taylor Grazing Act as Cattle, Sheep, Horses, Burros and Goats. I do not see indigenous animals.	23	See Responses #1 - #4.

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Ron & Maxine Korman	<p>H. R. Rep. No. 35, 64th Cong., 1st Sess., 4, 18 (1916)                      [53]Congress plainly expected that the surface of SRHA lands would be used for stockraising and raising crops. This understanding is evident from the title of the Act, from the express provision limiting the Act to lands the surface of which was found by the Secretary of the Interior to be "chiefly valuable for grazing and raising forage crops" and "of such a character that six hundred and forty acres are reasonably required for the support of a family," 43 U. S. C. § 292, and from numerous other provisions in the Act. See, e. g., 43 U. S. C. § 293 (patent can be acquired only if the entryman makes "permanent improvements upon the land entered . . . tending to increase the value of the [land] for stock-raising purposes of the value of not less than \$1.25 per acre"); 43 U. S. C. § 299 (prospector liable to entryman or patentee for damages to crops caused by prospecting).</p>	24	<p>The "production agriculture" argument is apparently based on the TGA statement, "chiefly valuable for grazing and raising forage crops" found in section 1 of the TGA. When the TGA was enacted, there were a plethora of land laws on the books that provided for the claiming and patenting of public lands (homestead laws, Timber and Stone Act, mining laws, desert land entry laws, etc.) if the claimant satisfied the entry, selection and location requirements of the applicable law. The formation of grazing districts was a Secretarial affirmation that the public lands inside the districts were "chiefly valuable for grazing and the raising of forage crops." Section 7 of the TGA authorizes disposal of lands within grazing districts, but before disposal could occur, required the government to re-classify them for a use that is something other than "grazing and raising forage crops." One exception to these provisions were any claims made under mining laws. Reclassification required "reasonable notice" to the grazing permittee. Thus, under the TGA, the formation of a grazing district created procedural hurdles to disposing land within that district (notice and reclassification). This helped ensure that decisions regarding land disposal were made "in the open" which in turn helped stabilize the livestock industry and further the effort towards orderly range administration. The Classification and Multiple Use Act of 1964 refined the "chiefly valuable" classification system employed by the US Geological Survey. It required BLM to classify lands either for disposal to a particular private use, or for retention in public ownership for multiple use purposes. The Federal Land Policy and Management Act of 1976 (FLPMA), for the first time, stated that the new federal policy is to retain public lands unless FLPMA-required land use planning determines that disposal will serve the national interest. As previously stated, one result of the TGA action of classifying public lands as "chiefly valuable for grazing" was to prevent lands within grazing districts from being disposed unless and until they were first reclassified as "chiefly valuable" for something else. FLPMA stated plainly that public lands will be retained unless it is decided otherwise through a planning process – and those processes require ample notice, hearing, comment, and analysis for all who may have concerns about the action (not to mention a requirement for a 2-year advance notice to the grazing operator). Thus, the purposes of the "chiefly valuable" provisions of TGA were supplanted by FLPMA planning and notice provisions.</p>
Ron & Maxine Korman	<p>Solicitor's Memorandum "Clarification of M-37008 concerning the authority for Bureau of Land Management to consider requests for retiring grazing permits and leases on public lands and must determine if lands are "chiefly valuable for grazing." The determination must be made for administrative purposes whenever the Secretary intends to establish a grazing district, add to a grazing district or modify a district's boundary. The Secretary must consider whether permitted lands remain chiefly valuable for grazing if any such retirement may ultimately result in modification of the district's boundaries. [...] Administrative factors that the Secretary should consider in making this determination are: (1) the disruptive effect to any remaining grazing allotments within the district; (2) the decisions effect on distribution of future grazing revenues within the district; and (3) whether rangeland health can be improved without constructing or maintaining physical range improvements. The Memorandum at page 3 states that grazing permits are issued for grazing within a grazing district and grazing leases are issued for grazing outside of a grazing district and that the Secretary should avoid contravening the purposes for which Congress enacted the TGA. Eliminating (livestock) grazing or a grazing district may breach the Secretary's duty to adequately safeguard grazing privileges [...]</p>	25	See Response #24.
Ron & Maxine Korman	<p>BLM failed to provide land patent(s) which original title traces back to; specifically identifying any that are SRHA. For each of the Stockraising tracts of land and appurtenances thereof, BLM failed to provide First Application For Grazing Permit; (which should be years 1936/1937). Application states how long the applicant had run stock in the area and types of numbers of livestock. The Application lists "Cattle, Sheep, Horses. The Application does not include bison, indigenous bison or buffalo. BLM's refusal to produce these official records could be an admission of destruction of those records. BLM failed to provide Tabulation Records which state the legal description for each of the affected grazing allotments, the forage capacity and class of livestock. BLM's refusal to produce these official records could be an admission of destruction of those records. For each of the Stockraising tracts of land and appurtenances thereof, BLM failed to recognize adjacent owners of tracts of land and appurtenances thereof; negative impacts and the Secretary of Interior's duty to faithfully execute laws and adequately safeguard rights.</p>	26	<p>The inclusion within the project record of land patent(s) reflecting original land titles are not warranted to support this grazing decision. See Response #1-#4 for a detailed discussion on type of livestock. Historical tabulation records containing legal descriptions and associated forage capacities have been used to determine current stocking rates and forage availability for each allotment. Mandatory terms and conditions, including AUMs are included in the final decision and supported by Chapter 2 of the EA. Adjacent landowners were involved in the development of the final decision. Given the level of public interest in the proposal, BLM initiated an increased effort to engage local and state cooperators and the interested public to the greatest extent possible. Consultation, cooperation and coordination requirements were met, or exceeded prior to issuance of the Proposed Decision in accordance with 40 CFR §1500.3(b) and 40 CFR §1506.6. The BLM provided a public scoping period, four public scoping meetings and an extended public comment period on the preliminary EA with an associated public meeting where further public comment was accepted. Supporting documents, project updates, contact information and opportunities to participate were available on BLM's ePlanning website.</p>

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Ron Tibbetts	The BLM is currently administering the seven grazing allotments under the Taylor Grazing Act. All Land Utilization lands and associated Public Domain Lands within the boundaries of the Grazing District are to be administered under the enabling legislation of the LU Lands called the Bankhead Jones Farm Tenant Act of 1937. The BLM has made a mistake in thinking they could apply the Taylor Grazing Act to administer the Land Utilization lands and associated Public Domain Lands within the Montana Grazing Districts and the associated allotments.	27	BLM-administered lands within the seven affected allotments that were acquired under the authority of the Bankhead-Jones Farm Tenant Act (1937) were part of the Milk River Land project (MT-LU-02) and transferred to DOI for administration under the TGA pursuant to EO 10787 and SO 2843.
Ron Tibbetts	The BLM cannot take a management approach that dismisses the unique legal status and historical development of the land utilization lands and ignores the purposes and uses for which the LU Lands were acquired under the Bankhead Jones Farm Tenant Act of 1937 (BHJFTA). The BLM has chosen to disregard the legal structure under which it is required to administer the LU Lands.	28	See Response #27.
Rose Stoneberg	This comment refers to page 10. The last paragraph on page 10 states that coordination requirements were met. Coordination is a requirement for "conformance with FLPMA 1976" as declared completed in the end of the top paragraph on page 10. I am requesting copies of the minutes of the formal coordination meeting with elected officials and of the EIS, as also required under FLPMA and as requested by many interested parties. Please provide copies or a letter stating that these requirements were not met.	29	All consultation, cooperation and coordination requirements were met, or exceeded prior to issuance of this decision in accordance with 43 CFR §4120.2, 40 CFR §1500.3(b) and 40 CFR §1506.6. The BLM provided a public scoping period, four public scoping meetings and an extended public comment period on the preliminary EA with an associated public meeting where further public comment was accepted. Supporting documents, project updates, contact information and opportunities to participate were available on BLM's ePlanning website. Formal coordination is not a requirement for an Environmental Assessment. The Freedom of Information Act (FOIA) is a federal law that gives the public the right to make requests for federal agency records. FOIA is an available separate process to obtain project documents. Project-related information, including a summary of substantive concerns and BLM responses, is available at the following web location: <a href="https://eplanning.blm.gov/eplanning-ui/project/103543/510">https://eplanning.blm.gov/eplanning-ui/project/103543/510</a> .
Valley County Commissioners	We believe your decision is in error because it would establish a precedent for piecemeal approval of APR's plan [...]	30	See Response #7.
Blaine County Commissioners	We believe that your decision does not follow proper management in accordance with the Taylor Grazing Act	31	See Responses #1, #2, #8, #19 and #27.
Missouri River Conservation District	In the proposed decision, BLM is allowing APR to remove over 30 miles of fence. Removing fence and creating larger pastures goes against most current cattle grazing practices. Any bison grazing requirements need to be the same as cattle grazing requirements on BLM lands.	32	BLM retains authority for the adjustment of range improvement projects. Under §4120.3-1(a) ("Conditions of Range Improvements"), any permittee or lessee may apply for a range improvement permit to install, use, maintain, and/or modify removable range improvements that are needed to achieve management objectives for the allotment in which the permit or lease is held. Such range improvement permits are issued at the discretion of the authorized officer. The regulations specify under §4120.3-1(b) "Conditions for range improvements") that prior to installing, using, maintaining, and/or modifying range improvements on the public lands, permittees or lessees shall have entered into a cooperative range improvement agreement with the Bureau of Land Management or must have an approved range improvement permit.  Under the proposed action most allotments would be in some sort of deferred rotation or rest-rotation grazing regime. Under all alternatives, BLM is required to monitor allotments for land health standards. If any allotment is determined to not be meeting the standards for rangeland health, changes would be made to bring it back into compliance. Changes could include additional fencing, rest-rotation practices, or reduction in AUMs. Specific terms and conditions are being added to the permits to ensure conformance with Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration (43 CFR §4130.3-1(c)). The final decision contains a complete description of mandatory and other terms and conditions, range improvement projects and a description of associated grazing system that adequately serve as functional allotment management plans (43 CFR §4120.2). The final decision also includes other terms and conditions that specify the kind of livestock that will graze, including the type of domestic indigenous livestock authorized to graze, actual use reporting, and the percentage of public land use determined by the proportion of livestock forage available on public lands within the allotments. Other terms and conditions are specified in the grazing permits that assist in achieving management objectives and proper range management.
Missouri River Conservation District	Why has a more detailed Environmental Impact Study not been completed for APR's Change of Use proposal on these BLM allotments? MRCD did not receive an answer to this question we proposed in our comment letter, and we believe it is a very important one for understanding the environmental impacts, changes to community economic, and research credibility within the Environmental Assessment that had been completed.	33	Based upon a review of the environmental assessment and the supporting documents, the Selected Alternative was determined to not be a major federal action and will not significantly affect the quality of the human environment, individually or cumulatively with other actions in the general area. No environmental effects meet the definition of significance in context or intensity as defined in 40 CFR §1508.27. An environmental impact statement is not needed. This finding is based on the ten significance criteria detailed in 40 CFR §1508.27 and context factors.

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Douglas and Jill Flament	The APR has been given special treatment regarding their usage of these allotments. Unlike the traditional ranchers who have accessed these lands for summer pastures and who must follow specific dates of usage, the APR will be allowed to have bison on the land in question, 12 months of the year, according to the new agreement. Not only are the bison not allowed by law to use these grazing allotments, the BLM is giving them the green light to use the land as they please. Ranchers are limited to primarily summer months to graze their livestock; the BLM plans to allow the APR to graze their bison for 12 months. In light of the current drought conditions that Central Montana is experiencing, this action is especially grievous.	34	Under the final decision, most allotments would be in some sort of deferred rotation or rest-rotation grazing regime. Under all alternatives, BLM is required to monitor allotments for land health standards. If any allotment is determined to not be meeting the standards for rangeland health, changes would be made to bring it back into compliance. Changes could include additional fencing, rest-rotation practices, or reduction in AUMs. Specific terms and conditions are being added to the permits to ensure conformance with Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration (43 CFR §4130.3-1(c)). The final decision contains a complete description of mandatory and other terms and conditions, range improvement projects and a description of associated grazing system that adequately serve as functional allotment management plans (43 CFR §4120.2). The final decision also includes other terms and conditions that specify the kind of livestock that will graze, including the type of domestic indigenous livestock authorized to graze, actual use reporting, and the percentage of public land use determined by the proportion of livestock forage available on public lands within the allotments. Other terms and conditions are specified in the grazing permits that assist in achieving management objectives and proper range management.
Douglas and Jill Flament	In addition to the illegal use of the grazing allotments by the APR, they have been allowed to conduct their own Environmental Assessment of the issue of allowing bison to graze year round. It is ludicrous to believe that any organization that is allowed to do their own study, would have findings that would disallow anything that that organization is trying to do to benefit their own organization. The study done by the APR should be thrown away and replaced by a study that has been done by an outside entity with no conflict of interest.	35	In accordance with 40 CFR §1506.5, BLM commonly uses third-party contracting in the preparation of NEPA documents, associated analysis and other supporting environmental documents. BLM identified an interdisciplinary team that was responsible for independent review, verification and acceptance of the analysis. BLM assumes responsibility for the accuracy, scope and content. All decisions and findings are those of the BLM, not the contractor. See Response #1-#5 for additional discussion specific to bison grazing on BLM-administered grazing permits.
Karyl Barnes	I think it very sad that APR can eliminate ranchers and farmers to run buffalo mainly for a tourist attraction.	36	No actionable content applicable to the proposed decision.
Norma Kelly	The BLM spent decades encouraging the cattle ranchers leasing the land to build cross fences to improve grasslands, preserve riparian areas, build dams and watering systems. Several ranchers have received conservation awards by using some of the BLM plans. Now these improvements will probably be damaged by the large buffalo and wallow that causes erosion.	37	See Response #32.
Robin and Roger Peters	The APR paid for the EA. This is a conflict of interest as we all know they come out in favor of whoever pays for it. The claim that verbal comments were accepted is false. I was at these meetings and NO Q&A was allowed, only written comments left at the venue.	38	See discussion specific to third-party contracting in Response #35. Transcripts of verbal comments submitted are available on BLM's ePlanning website at the following location: <a href="https://eplanning.blm.gov/eplanning-ui/project/103543/570">https://eplanning.blm.gov/eplanning-ui/project/103543/570</a> .
Robin and Roger Peters	A full Environmental impact statement has never been performed.	39	See Response #33.
Ron & Maxine Korman	See letter sent to Interior Secretary Debra Haaland and BLM Director Tracey Stone-Manning from Montana Senator Steve Daines and Montana Congressman Matthew Rosendale requesting extension of protest and appeal by 75 days and their reasons cited. BLM is or should be aware that this time of year, ranchers have increased demands due to calving season and so the timing of the release and limited response time are suspect. We agree that this is insufficient time to adequately review and respond.	40	See Response #29.
Ron Tibbetts	This approach to Grazing District administration will destabilize, and has the potential to destroy, agricultural operations dependent on forage from the LU and PD lands as seen in this Notice of Proposed Decision.	41	The socio-economic analysis on pages 3-36 to 3-45 of the EA found no significant impacts would result from the action alternatives. Additionally, the current proposal from APR would change 7,697 AUMS from cattle to cattle or bison. According to the 2017 National Agricultural Statistical Service Census of Agriculture, Phillips County has 51,502 beef cattle. The annual requirement for that number of cattle is approximately 618,024 AUMs of forage or equivalent. If all AUMs on BLM allotments authorized to APR were consumed by bison, it would amount to 1.25% of the forage in Phillips County. It is reasonable to conclude that this would not destabilize the livestock industry in Phillips County.

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Valley County Commissioners	BLM-administered grazing lands encompass over one million acres in Valley County, which is over 30% of the County. Continued availability of these lands for livestock grazing is critical to our economy and way of life. This proposed decision continues the threat that all BLM lands and associated state and private properties in Valley County will eventually be lost from agricultural production. This, along with the inflated land values that APR's entry in the market has caused, provokes a feeling of impending doom for many farmers, ranchers, and business owner's dependent on agriculture, as well as to most citizens who support agriculture and value our way of life. As County Commissioners, we share these feelings and fear the loss of the tax base that supports County services.	42	No actionable content applicable to the proposed decision. Valley County is outside of the decision area.