



**US Department of the Interior
Bureau of Land Management
North Central Montana District**

American Prairie Reserve Change in Use Application

**SUMMARY OF INPUT RECEIVED DURING
PUBLIC SCOPING**

December 2018



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ACRONYMS AND ABBREVIATIONS

Full Phrase

APR	American Prairie Reserve
BLM	Bureau of Land Management
CFR	Code of Federal Regulations
DOI	Department of the Interior
FLPMA	Federal Land Policy and Management Act
NEPA	National Environmental Policy Act
US	United States

SECTION I

BACKGROUND

The United States (US) Department of the Interior (DOI), Bureau of Land Management (BLM) manages public rangelands in Montana for various uses and values, including livestock grazing, recreational opportunities, healthy watersheds, and wildlife habitat. The overall goal of the BLM's rangeland management program is to ensure the health and productivity of public rangelands for the use and enjoyment of current and future generations. This program was established by the Taylor Grazing Act of 1934, and is administered in accordance with the Federal Land Policy and Management Act of 1976 (FLPMA), as well as the BLM's grazing administration regulations (43 Code of Federal Regulations [CFR] Part 4100) and other relevant agency policy. Under these authorities, a permit from the BLM is required in order to graze livestock on BLM-managed lands.

The American Prairie Reserve (APR) is a nonprofit organization operating in the State of Montana. APR owns private ranches within the area encompassing the BLM Montana's North Central District. Under BLM grazing regulations, the ranches owned by APR are considered "base properties" and they therefore hold grazing privileges to certain allotments on BLM-administered lands. In November 2017, APR submitted a proposal to the BLM to modify the terms and conditions of the permits for some of those allotments for which they possess grazing privileges. In response to APR's proposal, as required by the BLM's grazing regulations, the BLM has initiated an environmental review of APR's proposal in accordance with the requirements of the National Environmental Policy Act (NEPA). Note that the BLM does not have decision-making authority over state grazing leases within the allotments.

In summary, APR's application to the BLM seeks 10-year grazing permits for 18 allotments¹ located within the BLM's Glasgow, Lewistown, and Malta Field Offices and Upper Missouri River Breaks National Monument. Key aspects of the requested permit terms include:

- Change in kind of livestock type from cattle to bison²
- Change in the season of use to year-round grazing
- In general, removal of interior allotment fencing to create one pasture once the type of livestock has been changed to bison, while retaining water sources for livestock
- Electrification of perimeter allotment fencing
- Use of best available science to determine bison source
- Follow the same guidelines as cattle ranchers for disease control, as required by the Montana Department of Livestock

APR's complete proposal to the BLM is available online at <https://go.usa.gov/xQWBw>.

As part of the NEPA process, the BLM conducted a public scoping period to gain input from the public on the issues that should be analyzed as part of the environmental analysis. This document summarizes the BLM's public outreach efforts conducted during the scoping period and summarizes the issues raised by the public in response to APRs' proposal during that period.

¹ The BLM-managed grazing allotments are Beauchamp Creek, Burnt Lodge, Upper C.K. Creek, East Dry Fork (Pastures 1 and 3), French Coulee, Garey Coulee, Deadman Coulee, Dog Creek, Judith River, PN, PN Sag, Starve Out Flats, Flat Creek, Carpenter Creek, Upper/Lower 79 Trail, Two Crow RR, Upper First Creek, and White Rock Coulee. While certain state grazing leases are present within the boundaries of these BLM-managed allotments, the BLM does not make decisions regarding state grazing leases.

² BLM grazing regulations allow for the issuance of permits authorizing grazing by privately owned or controlled "indigenous" animals, including bison, through a special grazing permit or lease. See 43 CFR sec. 4130.6-4.

SECTION 2

DESCRIPTION OF THE PUBLIC SCOPING PROCESS

2.1 PUBLIC SCOPING PERIOD AND PUBLIC OUTREACH

Both NEPA's implementing regulations³ and DOI regulations⁴ require the BLM to engage in some form of public involvement – to the extent practicable – when preparing an environmental assessment. While public scoping is not required for an environmental assessment, the BLM determined it was appropriate for this proposal.

The BLM issued a news release on March 21, 2018, announcing the upcoming public scoping period from April 9 to May 9, 2018. The news release also provided notice of the four public meetings scheduled for April (see **Section 2.3**, Public Meetings) and additional information on how to submit input. On May 2, 2018, in response to requests from the public, the BLM issued a news release extending the public scoping period through June 11, 2018. Both news releases are available under the “Documents” tab at <https://go.usa.gov/xQWBw>.

2.2 METHODS OF COMMENT COLLECTION

During the public scoping period, the BLM encouraged the public to provide input on the scope of the NEPA analysis via a variety of methods designed to ensure that the public could provide input effectively. These methods were:

- Email at: blm_mt_scoping_ncmd@blm.gov
- Hand written comments during the public meetings
- Mail or hand delivery to:

APR Scoping Comments
BLM Malta Field Office
47285 US Highway 2
Malta, MT 59538

³ 40 CFR 1500.2(d), 1501.4(e)(2), 1506.6

⁴ 43 CFR 46.305

2.3 PUBLIC MEETINGS

Between April 9 and April 12, 2018, the BLM hosted a series of four open house-style public meetings in communities in north central Montana. These meetings were designed to solicit input from the public on issues to be analyzed in the BLM's environmental analysis of the APR's proposal and to share information on APR's proposal in order to facilitate the public's ability to provide effective input. Each open house included sign-in sheets for meeting attendees, tables with handouts, and posters displaying the BLM grazing allotments included in APR's proposal. The meetings were also attended by BLM staff, who were available to answer questions on the APR proposal or the NEPA process. The following meeting materials were available at the meetings:

- Comment cards for submitting written comments
- Overview of the environmental assessment process (handout)
- Overview of the environmental assessment process (poster)
- Preliminary issues identified for consideration (handout)
- Overview of the NEPA process (poster)
- Overview of APR's proposed action (handout)
- Overview map of the area (poster)
- Individual allotment maps (poster)

The meeting materials are available under the "Documents" tab at <https://go.usa.gov/xQWBw>.

Location	Date and Time	Number of Attendees (Approximate) ¹
Winnett <i>Petroleum County Courthouse</i>	Monday, April 9, 2018 1:30 p.m. to 5:00 p.m.	58
Winifred <i>Winifred Community Center</i>	Tuesday, April 10, 2018 1:30 p.m. to 5:00 p.m.	96
Malta <i>Old Junior High Gym</i>	Wednesday, April 11, 2018 1:30 p.m. to 5:00 p.m.	102
Glasgow <i>Cottonwood Inn</i>	Thursday, April 12, 2018 1:30 p.m. to 5:00 p.m.	95

¹ The number of attendees is based on those who signed in at the meeting; however, not all meeting attendees signed in, so these numbers are approximations.

SECTION 3

SUMMARY OF PUBLIC INPUT

3.1 SUMMARY OF PUBLIC INPUT

During the public scoping period, the BLM received 2,497 submissions regarding APR's proposal and the scope of the associated NEPA analysis. Each submission received was logged and organized. Since each submission may contain multiple comments, individual comments were parsed from larger submissions and then assigned a resource code and organized according to topic area. During the NEPA analysis, individual comments will be further evaluated and considered based on relevance and responsiveness to the proposal and to the scope of the analysis. Collectively, the comments will be used to further refine the issues to be analyzed.

Copies of each unique submission received, as well as a representative example of each of the 17 form letter campaigns received and a list of senders of each form letter, are available at <https://go.usa.gov/xQWBw>.

The table below summarizes the submissions received during the public scoping period. Although public input is accepted at any time, only comments received by June 11, 2018, are included in this report.

Type	Number of Submissions
Unique Submissions	749
Form Letters	1,748
Form 1	183
Form 2	54
Form 3	243
Form 4	148
Form 5	58
Form 6	146
Form 7	166
Form 8	52
Form 9	160

Type	Number of Submissions
<i>Form 10</i>	4
<i>Form 11</i>	15
<i>Form 12</i>	66
<i>Form 13</i>	137
<i>Form 14</i>	60
<i>Form 15</i>	56
<i>Form 16</i>	55
<i>Form 17</i>	145
Total	2,497

3.2 ISSUE STATEMENTS

Based on the substantive comments received during the scoping period, the following summary issue statements were developed:

1. How will the presence of bison on BLM-managed lands impact public safety?
2. How does the behavior of bison differ from cattle in terms of forage requirements and patterns of movement? Are the allotments of sufficient size to accommodate bison behavior?
3. How will the BLM ensure that the appropriate number of AUMs are permitted for each allotment and that the stocking rate stays within permitted levels? How would AUMs be managed if forage is reduced (e.g., during periods of drought, after wildfires, etc.)?
4. Without a pasture rotation system, how will the BLM ensure that BLM Montana Standards for Rangeland Health are met? This includes the condition of rangeland vegetation, soils (stability and health), water resources, and wetlands and riparian areas. Specific vegetation concerns include species composition, biodiversity, distribution, succession, and grassland heterogeneity. How will the BLM monitor for rangeland conditions and adaptively manage if conditions are not meeting standards?
5. What procedure and/or guideline will the BLM incorporate into management of Woody Draw and Cottonwood Galleries (for which there is not a specific standard)?
6. How will APR's proposed action impact stock water rights?
7. How will invasive weeds be monitored and managed within the allotments?
8. How would single pasture, year-round grazing impact prescribed burning and/or wildfire? How would potential rest or restoration

following disturbance be implemented in a single, year-round grazing system?

9. How would APR's proposed action conform with the terms of the conservation easements held by Montana Fish, Wildlife, and Parks on Carpenter and Burnt Lodge allotments?
10. How will potential diseases, such as brucellosis, in APR's bison herd be monitored and managed?
11. How would single pasture, year-round grazing impact habitat conditions (including winter range) and forage requirements for fish, wildlife, and special status species?
12. How would the proposed changes in fencing (removal or construction; electrification of external fencing; conversion to wildlife-friendly standards) impact wildlife, including their migration patterns?
13. How will the BLM ensure that proposed changes in fencing can be maintained and internal pasture fencing added, if range conditions warrant?
14. Is APR's proposed external fence design and fencing locations sufficient for containing bison?
15. How will shared fence lines between the APR and its neighbors be managed?
16. Would additional range improvements be necessary to effectively manage bison in a single pasture. If so, how would these developments impact visual resources?
17. Do the allotments possess sufficient winter forage to support year-round grazing for the permitted AUMs, as well as forage for other wildlife species? If not, how will supplemental forage be provided and is it feasible to do so?
18. How would fencing improvements or changes impact wilderness study areas or lands with identified wilderness characteristics? How would the proposal impact the objects and values identified in the Upper Missouri River Breaks National Monument proclamation?
19. How will electrified external fencing impact access for recreational opportunities, including river access?
20. How will single pasture, year-round grazing impact opportunities for hunting?

21. How would implementation of APR's proposal impact the local economy? How would it impact local custom and culture?
22. How would the implementation of the proposal impact tribal interests in the area?
23. How will the individual characteristics of each allotment be considered?
24. How would implementation of AP's proposal impact neighboring and in-common BLM grazing permittees?

3.3 NEXT STEPS

The BLM will consider and refine these issue statements, in conjunction with those developed by the BLM's interdisciplinary team, in determining the final set of issues to be include in the NEPA analysis. The BLM anticipates preparing an environmental assessment that is focused on the key issues and meets the legal requirements of NEPA and is in accordance with DOI guidance on streamlining the NEPA process. The public will be notified once the environmental assessment is complete.