

September 24, 2019

Tom Darrington and Clive Rooney,

APR is hereby withdrawing our previous bison grazing proposal dated November 20, 2017. Further, APR is hereby requesting the following changes on the Telegraph Creek, Flat Creek, White Rock, East Dry Fork/French Coulee, and Garey Coulee Allotments. State Leases #4873, #8171, #9361, #8160, and #9650, respectively, are associated with these BLM Allotments.

This request is in response to public concerns related to bison year-long continuous grazing and will give APR additional time to further demonstrate the sustainability of our preferred bison grazing system. This request also better reflects APR's expected bison stocking plans for at least the next 10 years, based on our desire to keep bison management operations centralized and to have herds of at least 400 animals to maintain genetic diversity. APR's new proposal significantly slows the pace of wildlife habitat improvements that would have been realized by the previously proposed fence removal and APR does so to help address the public concerns mentioned above.

APR's previous grazing request was based upon advice by the BLM to help ensure a thorough cumulative effects analysis. We are confident the agency can ensure the cumulative effects analysis is adequate, even with this change in APR's request.

Grazing Seasons:

APR's Sun Prairie Unit, consisting of deeded land, Box Elder Allotment, Telegraph Creek Allotment, and State leases #8124 and #4873 becomes the demonstration of year-long, continuous bison grazing and is grazed as one large pasture. Year-long continuous bison grazing is already approved for the Box Elder Allotment. Bison grazing is already approved for the Telegraph Creek Allotment and State leases. State lease #4873 is fenced out and is not being grazed at this time. Require Actual Use Report that runs from 11/1 – 10/31 and covers all land. 11/1 is the average time APR bison turn 6 months old.

Keep western portion of French Coulee and all small custodial parcels that are fenced in with deeded as 3/1-2/28 grazing season. This is how the French Coulee allotment is currently fenced. One option would be to combine French Coulee and East Dry Fork into a single allotment.

On all other allotments graze from 4/1 – 9/30. A 4/1 start date allows bison to be put out prior to calving. A 9/30 end date has bison calves of the year coming off BLM before they turn 6 months old. Require Actual Use Report that runs from 4/1 – 9/30.

Fences, Grazing Systems, and Cattleguards:

Telegraph Creek Allotment and State Lease #4873 - fence and maintain fences as shown on fence map. Remove some fence so there would be three pastures, instead of four, on the BLM.

Graze year-long and continuously with deeded land and Box Elder Allotment by leaving gates open. State Lease #4873 is currently fenced out and not being grazed by bison.

On all other allotments - fence and maintain fences as shown on fence maps. Construct, reconstruct, or modify interior and exterior fences to MTFWP's wildlife friendly standards with a four-wire fence, with a second from the top high tensile electric wire and the installation of solar charging panels. Electric fence notification signs required at gates and cattle guards. Replace single cattleguards with double cattleguards.

Flat Creek Allotment and State Lease #8171 - remove some fence so there would be four pastures, instead of five, on the BLM. Graze as a 4-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 would be different each year of the 4-year cycle.

White Rock Allotment and State Lease #9361 - remove and construct some fence so there would be three pastures, instead of four, on the BLM. Graze as a 3-pasture deferred rotation system where one pasture is deferred during the growing season each year. The deferred pasture would be different each year of the 3-year cycle. This system was approved for Ereaux's in 2003.

East Dry Fork Allotment and State Lease #8160 - split East Dry Fork so that Jacobs and APR each have their own allotment, not a shared or run in common allotment. APR have pasture 1 and a portion of pasture 3. Jacobs have pasture 2 and a portion of pasture 3. Pastures 2 and 3 are modified to give the Jacobs their additional 200+ AUMs. BLM makes this split in whatever way makes sense to them regarding proximity to the base properties. APR will build and maintain the new fence between pastures 2 and 3. All three of the East Dry Fork pastures have been grazed every year for some time now and the lessees have not all been running in common. State leases #9266 and #9267 would transfer to Jacobs, instead of being shared by APR and Jacobs.

Combine APR's two East Dry Fork pastures with their Garey Coulee pasture to create a 3-pasture deferred rotation system where one pasture is deferred during the growing season. The deferred pasture would be different each year of the 3-year cycle.

Garey Coulee Allotment and State Lease #9650 – Combine with APR's two East Dry Fork pastures to create a 3-pasture deferred rotation system where one pasture is deferred during the growing season. The deferred pasture would be different each year of the 3-year cycle.

Class of Livestock and AUMs:

Indigenous Animals (Bison) **and** Cattle on all permits

Sun Prairie: 2,522 BLM AUMs, 172 State AUMs, and 2,393 Deeded AUMs = 5,087 AUMs for 12 months = 424 animals. Deeded AUMs is the calculated AUMs for moderate or normal precipitation using the NRCS method. State Lease #4873 for 75 AUMs is currently fenced out

and not grazed. Until such time as it is fenced into the pasture those AUMs totaling 7 animals would not be used.

Retain the number of AUMs and animals on the current BLM permits and State Leases for Flat Creek, White Rock, East Dry Fork, French Coulee, and Garey Coulee Allotment and State Leases #4873, #8171, #9361, #8160, and #9650.

Other Requirements:

Tagging or identification of individual bison meets the requirements of MT Department of Livestock.

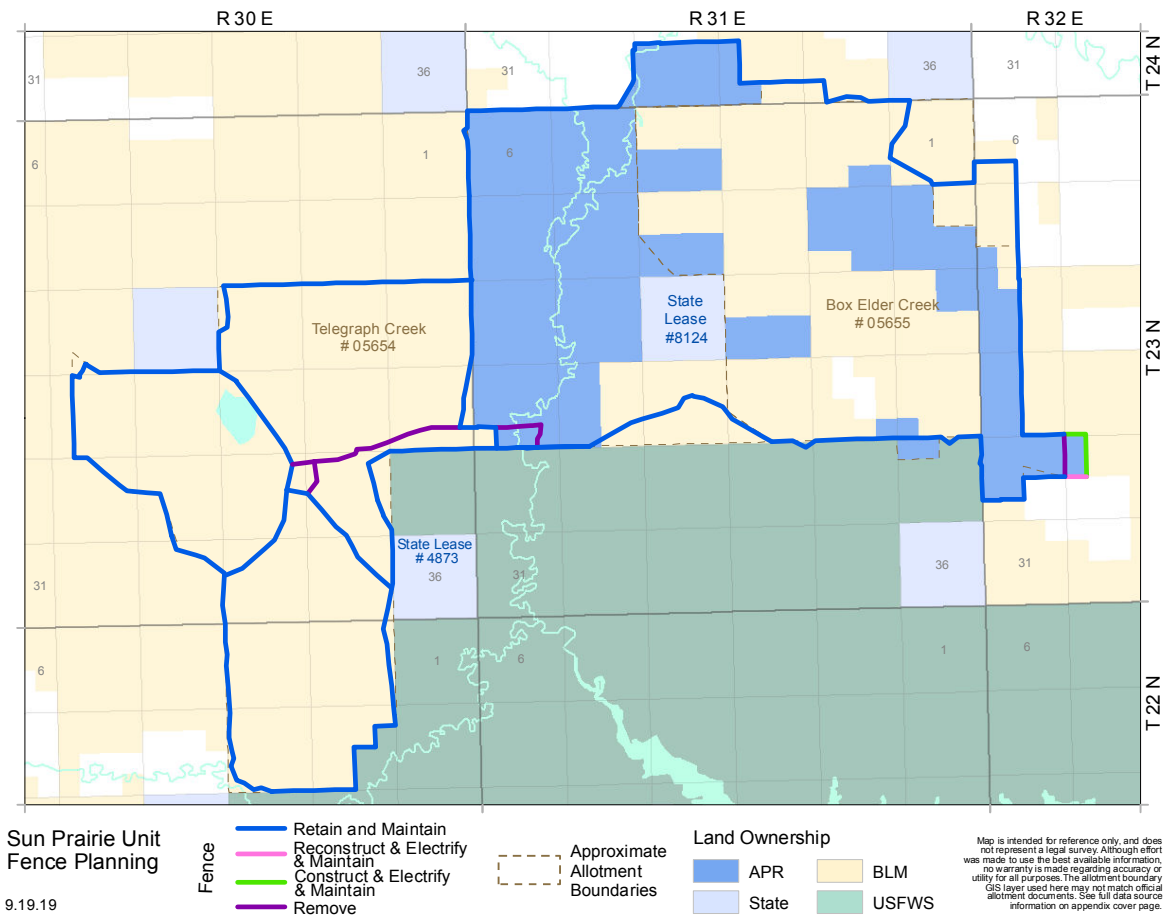
Disease testing meets MT Department of Livestock requirements.

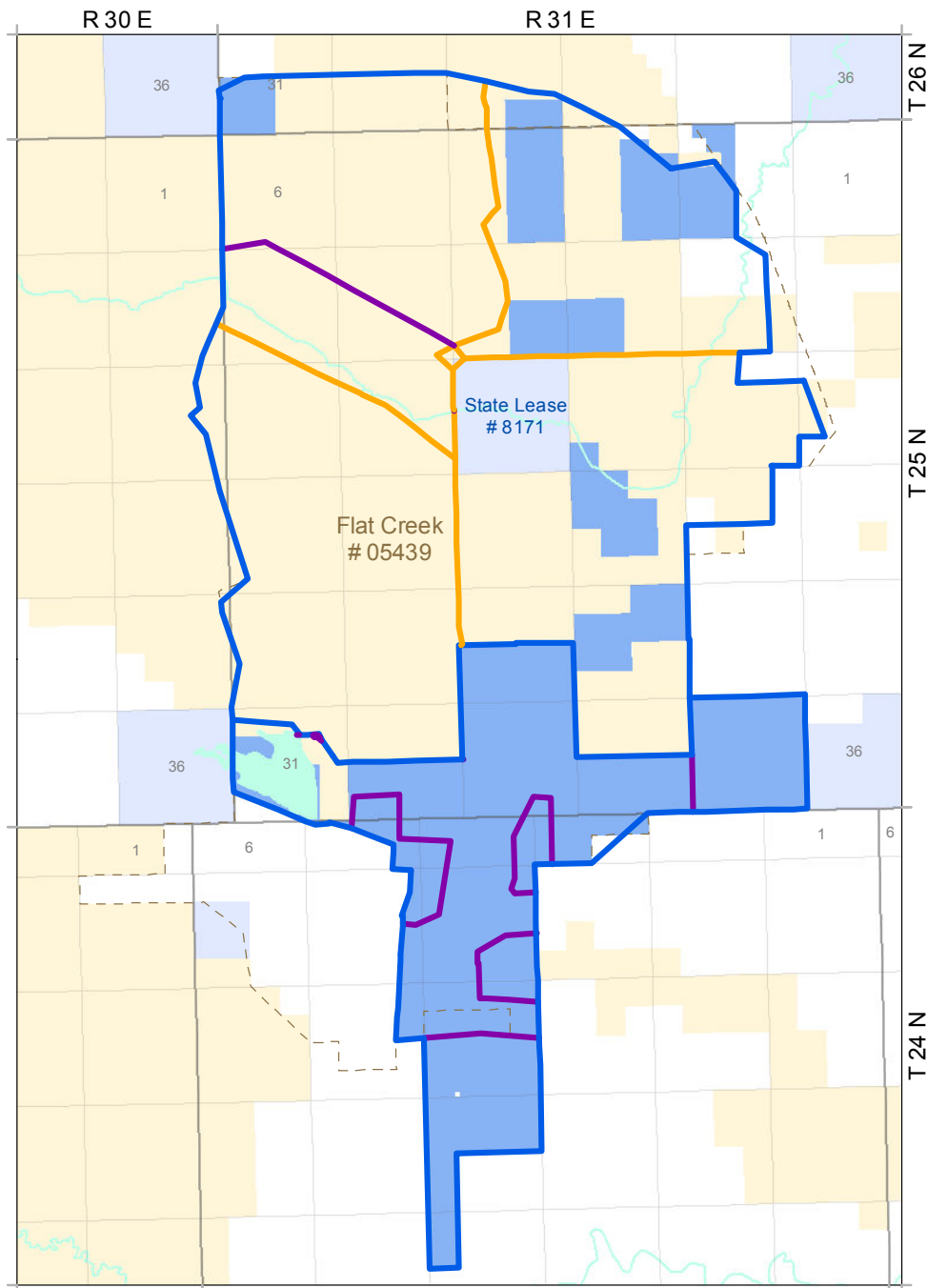
Summary of APR Revised Bison Grazing Proposal

APR Property Unit	BLM Allotment Name	Season of Use	BLM Allotment Acres	BLM AUMs	State DNRC Lease Number	State DNRC Leased Acres	State DNRC AUMs
Sun Prairie	Telegraph Creek (approved for bison in 2005)	3/1-2/28	11,546	1,481	4873	640	75
Sun Prairie North	Flat Creek	4/1-9/30 & 3/1-2/28 on Small Custodial Parcels	13,075	1,243	8171	640	26
White Rock	White Rock	4/1-9/30 & 3/1-2/28 on Small Custodial Parcels	16,942	2,056	9361	2,990	222
Dry Fork	East Dry Fork (shared allotment with Jacobs, requesting it be split)	4/1-9/30 & 3/1-2/28 on Small Custodial Parcels	11,545 (minus whatever acres needed to give Jacobs 200+ AUMs)	1,584	8160	640	121
Dry Fork	French Coulee	4/1-9/30 for portion fenced into East Dry Fork and 3/1-2/28 for portion fenced into deeded	80	7	N/A	N/A	N/A
Dry Fork	Garey Coulee	4/1-9/30 & 3/1-2/28 on Small Custodial Parcels	3,820	561	9650	40	12
TOTALS	N/A	N/A	57,008 (minus whatever acres needed to give Jacobs 200+ AUMs)	6,932	N/A	4,950	456

Associated With APR Revised Grazing Proposal But No Change is Requested and No Action is Needed

APR Property Unit	BLM Allotment Name	Season of Use	BLM Allotment Acres	BLM AUMs	State DNRC Lease Number	State DNRC Leased Acres	State DNRC AUMs
Sun Prairie	Box Elder (approved for bison and year-long grazing in 2014)	3/1-2/28	6,488	1,041	8124	640	97



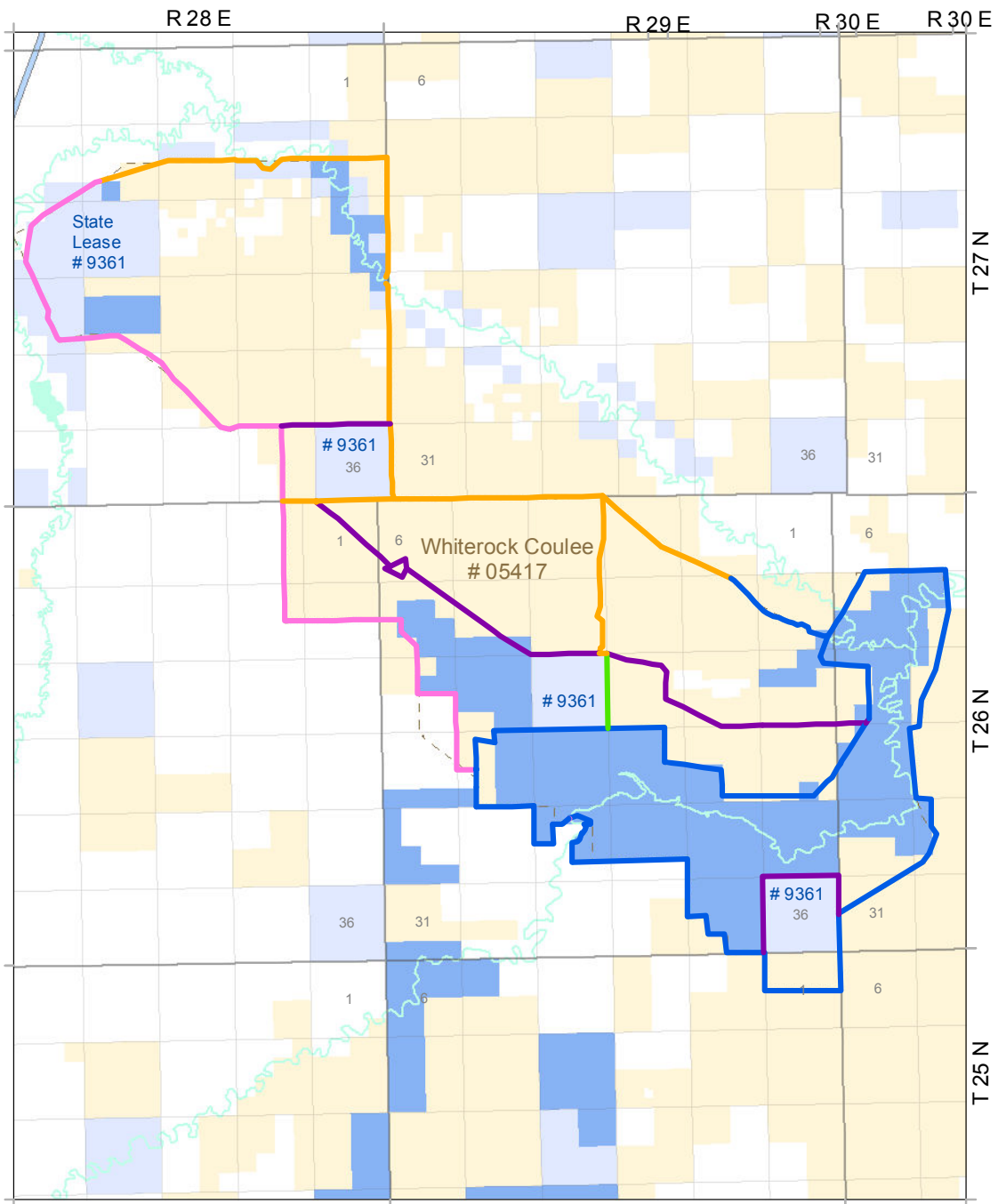


**Sun Prairie North
Fence Planning**
9.19.19

Map is intended for reference only, and does not represent a legal survey. Although effort was made to use the best available information, no warranty is made regarding accuracy or utility for all purposes. The allotment boundary GIS layer used here may not match official allotment documents. See full data source information on appendix cover page.

- Fence**
- Retain and Maintain
 - Electrify and Maintain
 - Remove
 - Approximate Allotment Boundary

- Land Ownership**
- APR
 - State
 - BLM



White Rock Unit Fence Planning

9.19.19

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Fence

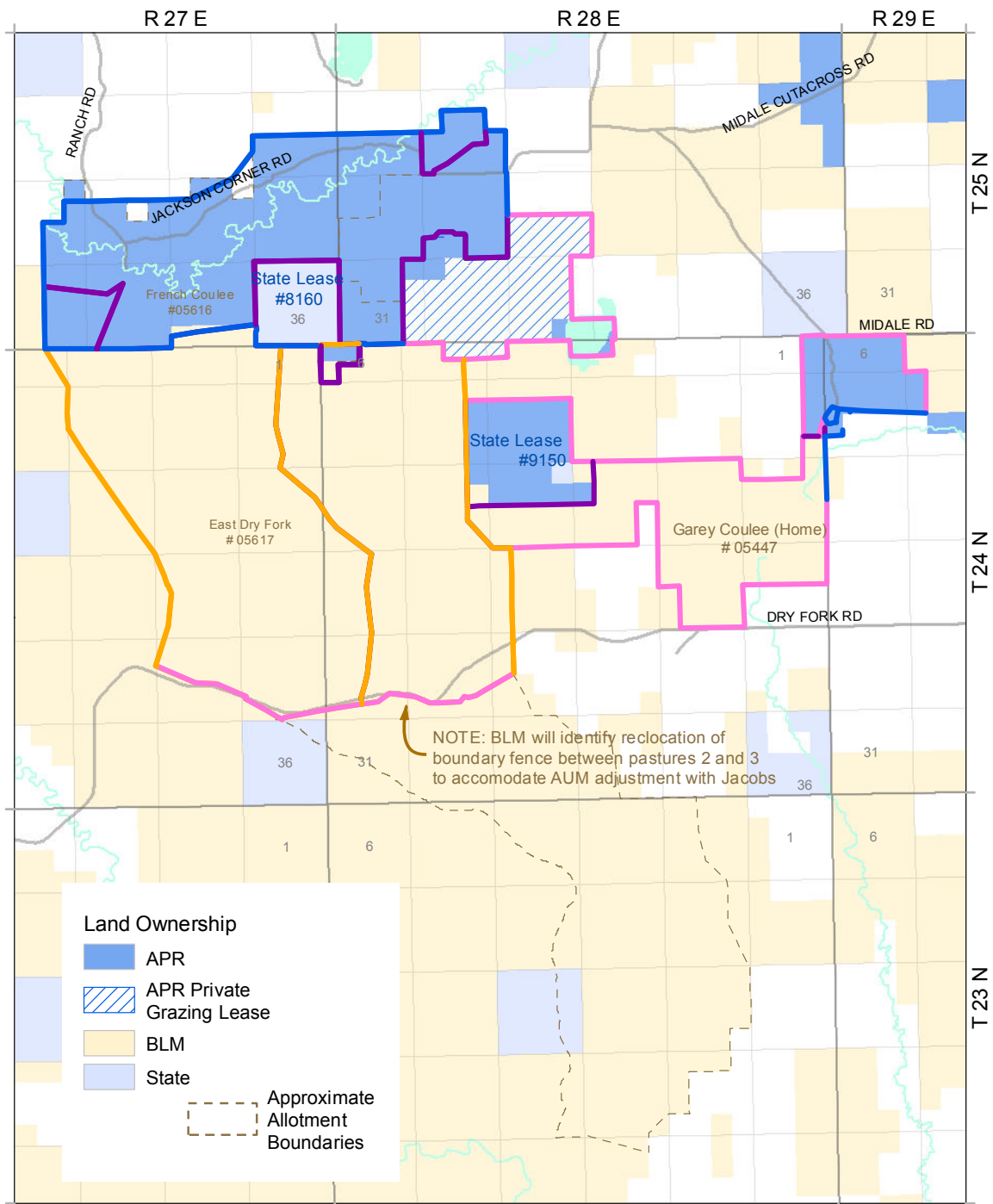
- Retain and Maintain
- Electrify & Maintain
- Reconstruct & Electrify & Maintain
- Construct & Electrify & Maintain
- Remove



Approximate
Allotment
Boundaries

Land Ownership

- APR
- State
- BLM



**Dry Fork Unit
Fence Planning**
9.19.19

- Fence**
- Retain and Maintain
 - Electrify & Maintain
 - Reconstruct & Electrify & Maintain
 - Remove

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