

August 8, 2025



Director Amanda Kaster
Montana DNRC
1539 Eleventh Ave
Helena, MT 59635

RE: Department of Natural Resources and Conservation; Notice of Proposed Rulemaking; MAR Notice No. 2025-91.1

The Montana Stockgrowers Association (MSGA) and Montana Public Lands Council (MPLC) represent cattle ranchers who graze livestock on private, state, and federal lands in Montana. MSGA and MPLC have worked for decades to develop and coordinate unified policy positions and regulatory actions that most effectively represent Montana ranchers whose livestock graze on public lands.

MSGA and MPLC appreciate the work the department has done to clean up language surrounding recreational use of state trust lands regulations. This review was long overdue and necessary. Our organizations are always appreciative of simplified rules and regulations that lead to clarity for all parties involved.

Primarily speaking to *NEW RULE 5 (36.25.1205) NOTICE TO LESSEES PRIOR TO ENTRY*, MSGA and MPLC see these rules as simpler, easier to read and easier to enforce. Ultimately, MSGA and MPLC expect to see reduced recreationalist confusion, increased compliance and clearer landowner notification. Landowners will also know what kind of notification to expect and it will allow them to prepare accordingly.

In regards to *NEW RULE 6 (36.25.1207) CLOSURE OF STATE TRUST LAND TO RECREATIONAL USE*, our organizations continue to appreciate the inclusion of the ability to close state trust lands from recreationalists via categorical closures or temporary management closure or restriction due to calving, shipping, or other substantial livestock management activities. The closures are important tools to ensure the efficiency of the operation but more importantly, the safety of the ranchers and the recreationalists.

MSGA and MPLC appreciate DNRC's transparency and their inclusion of landowner and lessee representation throughout this process.

Sincerely,

Ellie Brighton
MSGA | Government Affairs Specialist
MPLC | Executive Secretary