CHECKLIST ENVIRONMENTAL ASSESSMENT

Project Name:	APF 2026 Bison Grazing Proposal
Proposed Implementation Date:	Fall 2026
Proponent:	American Prairie Foundation, PO Box 908, Bozeman, Montana 59771
Location:	Section 16, T26N, R28E
County:	Phillips

I. TYPE AND PURPOSE OF ACTION

American Prairie Foundation (APF) has requested to construct, reconstruct, modify, and remove fencing and to change the class of livestock associated with State Lease 6732 in Phillips County. The Montana Department of Natural Resources and Conservation (DNRC) received APF's initial proposal and improvement request on February 2, 2026, and renewed proposal on June 9, 2026. On August 20, 2026, APF provided DNRC with supplemental information to support the department's analysis.

The project area is surrounded by APF deeded land to the north and east, Bureau of Land Management (BLM) land to the south, and a combination of APF and other deeded land to the west. The project area is defined as Section 16, T26N, R28E otherwise known as State Lease 6732 which encompasses 640 acres. The cumulative effects analysis area totals approximately 10,500 acres of surrounding lands of mixed ownership.

State Lease 6732 currently authorizes APF to graze cattle at a stocking rate of 120 Animal Unit Month (AUM). There is currently fencing on the north, east, and south perimeter of the State Lease 6732. APF proposes to change the class of livestock from cattle to bison and cattle on State Lease 6732. Additionally, APF is proposing to reconstruct or modify one (1) mile of fence on the south perimeter of State Lease 6732, reconstruct or modify two (2) miles of existing fence along the east and north perimeter, and construct half of a mile of new fence along the south half of the west perimeter of State Lease 6732. Over the larger project area APF is proposing to construct approximately 2.9 miles of fence, reconstruct and electrify approximately 9.8 miles of fence, retain and maintain approximately 15 miles of fence, and remove approximately 5.2 miles of fence. All fence construction, reconstruction, or modification will be developed to Montana Department of Fish Wildlife and Parks (FWP) wildlife friendly standards with a four-wire fence 42 inches high. The fence design consists of a barbless high tensile steel wire at 18 inches, a barbed wire strand at 24 inches, with a high tensile electric wire at 30 inches and a barbed wire strand at 42 inches. T-post fence posts will be spaced at 16 ½ feet apart and solar charging panels will be installed to electrify the electric strand

Electric fence notification signs will be installed at gates and cattle guards. Single cattleguards will be replaced with double cattleguards at all motorized access points to the state lease.

II. PROJECT DEVELOPMENT

1. PUBLIC INVOLVEMENT, AGENCIES, GROUPS OR INDIVIDUALS CONTACTED:

Provide a brief chronology of the scoping and ongoing involvement for this project. List number of individuals contacted, number of responses received, and newspapers in which notices were placed and for how long. Briefly summarize issues received from the public.

DNRC conducted a 14-day public comment period from August 26, 2026, through September 9, 2026. See *Appendix B: Public Comment Period Summary.* From that effort, fifteen formal issue statements were developed. Ten of these issue statements were carried forward for analysis while the remaining five issue statements were dismissed from analysis with rationale (*Appendix C: Issue Statement Development*).

Based on analysis of the comments and information received during the public comment period as well as the scope and scale of the proposed action, it was determined that further public comment or a public hearing was not warranted and a qualitative checklist environmental analysis was appropriate for the issues identified.

2. OTHER GOVERNMENTAL AGENCIES WITH JURISDICTION, LIST OF PERMITS NEEDED:
Examples: cost-share agreement with U.S. Forest Service, 124 Permit, 3A Authorization, Air Quality Major Open Burning Permit.

APF's bison are regulated by the Montana Department of Livestock pursuant to Title 81, Mont. Code Ann.

The Montana Sage Grouse Oversight Team (MSGOT) in partnership with the Montana Sage Grouse Habitat Conservation Program consults on ground disturbing projects within Sage Grouse habitat on state trust lands.

3. ALTERNATIVE DEVELOPMENT:
Describe alternatives considered and, if applicable, provide brief description of how the alternatives were developed. List alternatives that were considered but eliminated from further analysis and why.

Alternative A: Action Alternative. APF would be authorized to change the class of livestock from cattle to bison and cattle, and to proceed with fence construction, reconstruction, and modification associated with State Lease 6732.

Alternative B: No Action Alternative. APF would not be authorized to change the class of livestock to bison and cattle, and would not be authorized to proceed with the proposed fence construction, reconstruction, and modification associated with State Lease 6732. APF would continue to be authorized to graze cattle only with the current fence configuration.

III. IMPACTS ON THE PHYSICAL ENVIRONMENT

- *RESOURCES potentially impacted are listed on the form, followed by common issues that would be considered.*
- *Explain POTENTIAL IMPACTS AND MITIGATIONS following each resource heading.*
- *Enter "NONE" If no impacts are identified or the resource is not present.*

4. GEOLOGY AND SOIL QUALITY, STABILITY AND MOISTURE:
Consider the presence of fragile, compactable or unstable soils. Identify unusual geologic features. Specify any special reclamation considerations. Identify direct, indirect, and cumulative effects to soils.

Issue Statement: There is a concern that the proposed action may increase soil compaction and erosion, decreasing soil productivity.

Soils in the project area range in texture from clay to silty clay loams with low coarse fragment content and high shrink-swell capacity. Landforms are generally flat and rarely exceed 25 percent slope. Soil compaction and displacement hazard from grazing and off-road travel is generally low when dry and increases as soil moistures are elevated. Soil erosion hazard is generally low to moderate dependent on local slope and the precipitation intensity of a convective erosional event. Due to the low annual precipitation (12 in/yr), temperature regimes, and ecological site, soils are low to moderately productive.

The proposed actions included in Alternative A would have no impact on soil compaction and erosion hazard and overall site productivity would be maintained when compared to the No Action Alternative. No cumulative effects on soil resources from the proposed actions would be expected.

5. WATER QUALITY, QUANTITY AND DISTRIBUTION:
Identify important surface or groundwater resources. Consider the potential for violation of ambient water quality standards, drinking water maximum contaminant levels, or degradation of water quality. Identify direct, indirect, and cumulative effects to water resources.

Issue Statement: There is a concern the proposed action may affect water quality and watershed function.

The majority of the project area is within the Upper Beaver Creek watershed (6th Code HUC 100500140205) which is tributary to Little Warm Creek. Water quality use class is classified as B-3. Waters classified as B-3 are suitable for drinking, culinary, and food processing purposes after conventional treatment; bathing, swimming and recreation; growth and propagation of non-salmonid fishes and associated aquatic life, waterfowl and furbearers; and agricultural and industrial water supply. All beneficial uses in Little Warm Creek are fully supported, and no Total Daily Maximum Loads (TMDLs) have been developed.

All channels in the project area flow intermittently, typically flowing less than 6 months a year and are rarely hydrologically connected to downstream waters. Constructed stock water reservoirs exist in the project area creating seasonal riparian features. Three naturally occurring intermittent ponds and associated ephemeral wetlands (approximately 44 acres total) also exist in the interior of the project area. The proposed modification, reconstruction, and construction of fences around the perimeter of the site, and associated access routes, do not impact any identified water resources in the project area.

Implementation of the of the Action Alternative A, would have no measurable effects on water quality and watershed function over the no- action alternative. No cumulative effects to water quality or watershed function would occur as a result of implementing the Action Alternative.

6. AIR QUALITY:

What pollutants or particulate would be produced (i.e. particulate matter from road use or harvesting, slash pile burning, prescribed burning, etc.)? Identify the Airshed and Impact Zone (if any) according to the Montana/Idaho Airshed Group. Identify direct, indirect, and cumulative effects to air quality.

The proposed action alternative involves minimal soil disturbance during fence construction, reconstruction, and modification, generating negligible fugitive dust. Converting to or combining bison and cattle grazing will not increase vehicle exhaust emissions during standard ranching operations. Consequently, vehicle and particulate emissions will have a negligible impact on local air quality, and no cumulative air quality impacts are anticipated

7. VEGETATION COVER, QUANTITY AND QUALITY:

What changes would the action cause to vegetative communities? Consider rare plants or cover types that would be affected. Identify direct, indirect, and cumulative effects to vegetation.

<u>Issue Statement:</u> There is a concern that the proposed grazing management plan and associated lease terms may affect the long-term ecological condition and productivity of rangeland.

Field appraisals conducted by DNRC at the time of lease renewal indicate that vegetative communities onsite are dominated by native upland range species such as western wheatgrass, green needlegrass, needle and thread, blue gramma, and prairie June grass, with the presence of invaders such as cheatgrass persistent throughout the site. The presence of noxious weeds has not been documented as an issue onsite. Range conditions are generally good in sites with silty soil and fair to good in sites with denser clay soil. The trend of the range condition has generally been downward resulting in a decreasing carrying capacity of the landscape under a regime of historic cattle grazing across multiple lessees since the 1950s.

DNRC calculates carrying capacity through animal unit months (AUMs), which is the amount of dry forage required to sustain an animal unit for one month. Currently State Lease 6732 has an assessed carrying capacity of 120 AUMs meaning on a typical year approximately 50.3 tons of viable forage is produced onsite. APF obtained the lease through assignment in July 2024 and has been authorized to graze cattle on the lease since. State Lease 6732 expires on February 28, 2029.

Generally, bison grazing pressure is more dispersed than cattle providing for more even utilization on large pastures and is not as concentrated around lowland areas or water sources.

Direct, indirect, and cumulative impacts to long-term ecological condition and range productivity as a result of implementing the Action Alternative present a low risk and effects are not anticipated to be measurable.

<u>Issue Statement:</u> There is a concern that the proposed action animal unit equivalents for bison will cause degraded range conditions.

DNRC utilizes one (1) 1,000 lb cow with a calf as its standard animal unit (AU) for the basis of calculating AUMs. Historically, lessees grazing bison on state trust lands have been authorized to calculate stocking rates for bison by treating a bison and a cow of equivalent weight as having the same animal unit equivalency.

Authorizing bison alongside cattle on State Lease 6732 is not anticipated to adversely affect vegetative communities because APF remains strictly capped at 120 AUMs per calendar year regardless of livestock type. Range degradation is primarily driven by poor lease management and overstocking rather than the specific class of livestock being grazed.

To mitigate potential range impacts, DNRC conducts field evaluations of each tract during the summer prior to lease renewal to assess baseline range conditions and establish appropriate carrying capacities for the subsequent lease term. Based on these evaluations, DNRC maintains administrative authority to adjust carrying capacities, shorten lease terms, increase inspection frequency, apply special stipulations, or deny lease renewal to address any identified degradation.

Implementation of Alternative A has a low risk of low level direct, indirect and cumulative effects to range conditions.

Issue Statement: There is a concern the proposed action may cumulatively affect range conditions on adjacent deeded, state, and federal lands.

Fencing construction and modification would result in negligible disturbance to vegetative communities and would be limited to the time of fencing operations. State Lease 6732 is not proposed to be fenced in common with adjacent federal land or private land other than that owned by APF. For the reasons stated above, it is anticipated that Alternative A would have no direct, indirect, or cumulative impact on range conditions for adjacent private or federal land compared to the no-action alternative.

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8. TERRESTRIAL, AVIAN AND AQUATIC LIFE AND HABITATS:
Consider substantial habitat values and use of the area by wildlife, birds or fish. Identify direct, indirect, and cumulative effects to fish and wildlife.

Issue Statement: There is a concern that proposed fence construction plan may alter wildlife migration and movement.

APF proposes to:

1. reconstruct or modify one (1) mile of fence on the south perimeter;
2. reconstruct or modify two (2) miles of existing fence along the east and north perimeter;
3. construct half of a mile of new fence along the south half of the west perimeter of State Lease 6732.

Within the overall cumulative effects analysis area, APF is also proposing to convert approximately 9.8 miles of fence that currently exist on the landscape to a wildlife friendly design standard (see *Appendix F; Figures*). Additionally, 5.2 miles of non-wildlife friendly fence will be removed from the landscape and 2.9 miles of wildlife friendly fence, predominately around the western perimeter of the overall project area, will be constructed. Most of the fence work described can be done without DNRC authorization and would result in a net decrease in the amount of fencing on the landscape. As a result, a net increase in wildlife friendly fence on the landscape and decrease in total fence would provide beneficial direct, indirect, and cumulative effects to wildlife migration and movement within the project area and cumulative effects analysis area.

Issue Statement: There is a concern that the proposed action may degrade wildlife habitat quality.

Historical range evaluations of State Lease 6732, completed on decadal time scales, provide evidence that the general condition of the range has been degrading since approximately the 1950's. As a result, forage quality for ungulate wildlife species is also generally degraded compared to similar reference dryland range sites. Range conditions are expected to stabilize and/or potentially improve with continued monitoring and improved implementation of grazing management plans, regardless of the selected alternative. As a result,

implementation of Alternative A would have no direct, indirect or cumulative impacts on habitat quality for wildlife species in the project area compared to Alternative B.

Issue Statement: There is a concern the proposed fence construction plan may be inadequate to contain bison.

Resources consulted indicate that successful bison containment depends on multiple factors such as terrain, stocking rate, season, animal temperament, water and forage availability, and fencing design and maintenance. As noted in Section 13, this environmental assessment is limited to considering those factors for APF's bison grazing and fencing proposal for State Lease 6732.

Unlike cattle, Montana statute prohibits bison from running at large. 81-4-201, MCA. Evaluating the risk of bison escapes for the proposal requires balancing two distinct objectives: bison containment under Montana law and wildlife connectivity under Montana Fish, Wildlife & Parks (FWP) fencing guidelines. A fence designed to meet FWP's wildlife friendly standards (typically a 4-strand wire fence, top wire at 40–42 inches, smooth bottom wire at 16–18 inches off the ground) introduces inherent structural trade-offs in an effort to balance wildlife needs and livestock containment. FWP's guidelines specifically note that sheep, bison, and cattle may require a more impermeable fence to achieve containment. FWP's guidance is particularly important here, given that APF's bison are managed as wildlife and are not accustomed to humans.

APF is required to contain its bison to lands they are permitted to graze. Based on the proposed action, if bison were to escape from either the south perimeter or the south half of the west perimeter, APF bison would be entering lands not owned by APF or DNRC.

Because empirical data on bison interaction with standard 4-wire wildlife-friendly fences vary by terrain, stocking rate, season, animal temperament, water and forage availability, and fence maintenance, the exact rate of escape cannot be calculated deterministically. Escape data from APF from previous grazing seasons provides good information to forecast risk and duration of escapes. APF tracked data regarding bison escapes and cattle incursions from 2011 through 2022.

- In 2020, there were 18 bison escapes and 6 cattle incursions.
- In 2021, there were 11 bison escapes and 6 cattle incursions.
- In 2022, there were 6 bison escapes and 2 cattle incursions.

The data for this period indicates that the ratio of bison escapes to cattle incursions was approximately 3:1 for 2020, 2:1 for 2021, and 3:1 for 2022. These ratios appear consistent with APF's pre-2020 data regarding bison escapes and cattle incursions. Ultimately, the data reflects that bison breach perimeter fencing at a higher rate than cattle.

The data also reflects that for most escapes, APF returned the bison to APF deeded or permitted land within a short time of discovering or being notified of the escape. However, there were escape events that resulted in bison running at large for prolonged periods of time, that required aerial assistance, or that required bison to be lethally removed. DNRC has no records of cattle escape from State Lease 6732 and has no records of bison escapes from trust land leases in other areas of Montana against which to compare this data.

If bison grazing for State Lease 6732 is approved the following requirements could mitigate the potential for significant impacts:

- APF properly maintains the 1 ½ miles of perimeter fence on the south half of the west boundary and south boundary of the state trust land;
- APF routinely monitors bison while grazing on state land;
- APF implements rapid response to recapture escaped bison;
- APF continues to track and report bison escape and cattle incursion data, including: date of escape/incursion; number of bison/cattle involved; the location, cause, and duration of the escape; and, the remedial action taken.

The failure to implement these measures would increase the risk of high frequency or prolonged bison escapes.

9. UNIQUE, ENDANGERED, FRAGILE OR LIMITED ENVIRONMENTAL RESOURCES:

Consider any federally listed threatened or endangered species or habitat identified in the project area. Determine effects to wetlands. Consider Sensitive Species or Species of special concern. Identify direct, indirect, and cumulative effects to these species and their habitat.

No unique, fragile, or limited environmental resources are present within the project area. Sensitive species and species of concern were evaluated using Montana Natural Heritage Program data (*Appendix D*). Based on current site conditions and environmental review, no direct, indirect, or cumulative impacts are anticipated.

10. HISTORICAL AND ARCHAEOLOGICAL SITES:

Identify and determine direct, indirect, and cumulative effects to historical, archaeological or paleontological resources.

Issue Statement: There is a concern that the proposed action may affect cultural or archaeological resources.

A Class I (literature review) level review was conducted by the DNRC staff archaeologist for the Montana trust lands within the area of potential effect (APE). This entailed inspection of project maps, DNRC's sites/site leads database, land use records, General Land Office Survey Plats, and control cards. The Class I search results revealed that two cultural resources (24PH1306 and 24PH1332) have been identified in the APE. These are typical, pre-contact Native American stone features (low-profile cairns and stone circles (tipi rings)) and minor concentrations of chipped stone debitage. Presently no cultural resources that might be considered unique or highly sensitive have been identified in the APE.

Proposed grazing plan revisions (including fence construction and fence removal plans) will not qualitatively change the surface management or types of activities occurring on the affected Montana trust lands. It is unlikely that ongoing grazing and fencing activities will cause or magnify physical impacts to existing cultural resources in the APE. American Prairie's revised bison grazing proposal is expected to have no effect to antiquities as defined in the Montana State Antiquities Act.

11. AESTHETICS:

Determine if the project is located on a prominent topographic feature or may be visible from populated or scenic areas. What level of noise, light or visual change would be produced? Identify direct, indirect, and cumulative effects to aesthetics.

The state trust land does not have unique scenic qualities distinct from those found on adjacent private and federal lands. The proposed project primarily involves fence modification, replacement, and construction, which will reduce visual obstructions across the landscape. The shift to bison grazing, or a mix of bison and cattle grazing will have a negligible visual impact due to the routine presence of livestock in the area. Consequently, no direct, indirect, or cumulative impacts to aesthetic resources are anticipated.

12. DEMANDS ON ENVIRONMENTAL RESOURCES OF LAND, WATER, AIR OR ENERGY:

Determine the amount of limited resources the project would require. Identify other activities nearby that the project would affect. Identify direct, indirect, and cumulative effects to environmental resources.

The proposed action will not alter the demand for environmental resources, such as land, water, air, or energy, relative to the no-action alternative. No additional consumption of limited local resources is anticipated beyond current baseline levels. There are no known additional past, present, or reasonably foreseeable projects in the area that would interact with or affect the proposed action.

13. OTHER ENVIRONMENTAL DOCUMENTS PERTINENT TO THE AREA:

List other studies, plans or projects on this tract. Determine cumulative impacts likely to occur as a result of current private, state or federal actions in the analysis area, and from future proposed state actions in the analysis area that are under MEPA review (scoped) or permitting review by any state agency.

Other studies, plans or projects within the project area that were used to describe the existing conditions and forecast potential cumulative effects include:

1. DNRC Lease Renewal Field Evaluations
2. American Prairie Reserve Bison Change of Use Environmental Assessment (EA) (DOI-BLM-MT-L010-2018-0007-EA)
3. BLM Notice of Final Decision (May 8, 2026)

APR's 2019 proposal to convert federal grazing permits from cattle to a large-scale conservation bison herd has generated extensive litigation over whether doing so violates the Taylor Grazing Act, Federal Land Policy and Management Act, Public Rangelands Improvement Act, National Environmental Policy Act, and BLM regulation.

This MEPA analysis is limited to evaluation of the environmental impacts of grazing bison, at a maximum of 120 AUM, on 640 acres of state trust land, the construction/reconstruction of 3 ½ miles of perimeter fence and bison containment. This analysis does not evaluate whether federal law authorizes APF's proposal on federal land or the impacts of a large-scale conservation bison herd on the landscape. Neither does it evaluate whether the Montana Board of Land Commissioners should authorize APR's proposal to graze bison on State Lease 6732 in exercising is broad discretion over management of state trust lands pursuant to the Montana Constitution and Title 77, Mont. Code Ann.

IV. IMPACTS ON THE HUMAN POPULATION

- *RESOURCES potentially impacted are listed on the form, followed by common issues that would be considered.*
- *Explain POTENTIAL IMPACTS AND MITIGATIONS following each resource heading.*
- *Enter "NONE" If no impacts are identified or the resource is not present.*

14. HUMAN HEALTH AND SAFETY:
Identify any health and safety risks posed by the project.

<u>Issue Statement:</u> There is a concern that the proposed action may affect public recreation and/or public access to the state trust land.

A change in livestock class to bison presents a small risk to public safety. While bison on publicly accessible lands can be safely observed from a distance, they are large, unpredictable animals that may charge or gore humans if approached or threatened. To minimize direct interaction, only trained and qualified personnel will handle bison. Warning signage would also be installed at access points, gates, and/or cattleguards.

Containing bison and preventing public safety or property conflicts requires thoughtful perimeter fencing. As explained above, the data indicates that bison will escape containment under Alternative A at a higher frequency than cattle would escape containment under the no action alternative. This, in combination of bison behavior and fencing limitations, presents a higher risk to human health and safety as opposed to the no action alternative.

To mitigate public safety risks and property damage concerns, warning signage will be installed at access points, gates, and cattleguards; a measure proven effective in similar grazing management contexts. Additional adaptive management measures will be implemented if localized conflicts arise.

Construction and electrification of approximately 3.5 miles of fence surrounding State Lease 6732 pose minor, temporary occupational and operational safety risks, which will be mitigated by high-visibility signage at gates and cattleguards.

Compared to Alternative B, the proposed action presents an elevated risk to human health and safety. That risk can be mitigated for bison contained on State Lease 6732 through public signage, specialized fencing, and handling protocols. The risk is more difficult to mitigate for bison that escape from State Lease 6732. The risk posed by escaped bison could be mitigated, but not eliminated, by strict compliance with the mitigation measure described in Section 8.

Subject to the mitigation measures described in Section 8, the indirect or cumulative impacts to human health and safety can be reduced.

15. INDUSTRIAL, COMMERCIAL AND AGRICULTURE ACTIVITIES AND PRODUCTION:
Identify how the project would add to or alter these activities.

A change in class to bison and cattle would not change the availability or quantity of Animal Unit Month's (AUMs) available to be utilized by the proponent. The fencing plan would allow the proponent to more efficiently utilize the AUMs available, in alignment with the organization's goals. No direct, indirect, or cumulative impacts are anticipated.

16. QUANTITY AND DISTRIBUTION OF EMPLOYMENT:
Estimate the number of jobs the project would create, move or eliminate. Identify direct, indirect, and cumulative effects to the employment market.

Alternative A has the potential to create temporary additional revenue and work for a local firm or firms to supply materials, or remove, construct, and reconstruct the proposed fencing. The effect of the proposed action on quantity and distribution of employment is expected to be negligible.

17. LOCAL AND STATE TAX BASE AND TAX REVENUES:
Estimate tax revenue the project would create or eliminate. Identify direct, indirect, and cumulative effects to taxes and revenue.

The trust beneficiaries would not receive additional revenue because of the change of class of livestock to bison and cattle, as the lease rates are based on a per AUM basis, regardless of the class of livestock.

The Department of Revenue per capita fee, which is a fee per head of livestock that is set by the Board of Livestock, is $2.20 higher for domestic bison than cattle, which could generate additional tax revenue.

No other direct, indirect, or cumulative impacts to taxes and revenues are anticipated compared to the no action alternative.

18. DEMAND FOR GOVERNMENT SERVICES:
Estimate increases in traffic and changes to traffic patterns. What changes would be needed to fire protection, police, schools, etc.? Identify direct, indirect, and cumulative effects of this and other projects on government services

No direct, indirect or cumulative effects are expected regarding the demand for government services in the local or regional area because of the implementation of the Alternative A.

19. LOCALLY ADOPTED ENVIRONMENTAL PLANS AND GOALS:
List State, County, City, USFS, BLM, Tribal, and other zoning or management plans, and identify how they would affect this project.

The DNRC Administrative Rules for State Land Leasing ARM 36.25.101 through 36.25.141 dictate how the DNRC manages its lands for agricultural and grazing leases.

Phillips County Conservation District Settlement agreement places additional disease testing requirements on APF's bison herd to mitigate the potential for disease transmission to domestic cattle. (*see Appendix G: References*)

20. ACCESS TO AND QUALITY OF RECREATIONAL AND WILDERNESS ACTIVITIES:
Identify any wilderness or recreational areas nearby or access routes through this tract. Determine the effects of the project on recreational potential within the tract. Identify direct, indirect, and cumulative effects to recreational and wilderness activities.

Issue Statement: There is a concern that the proposed action may affect public recreation and/or public access to the state trust land.

Recreational Conflicts and Public Safety
Authorizing a shift to a mixed herd of bison and cattle, along with associated fencing modifications, introduces potential conflicts with recreational users on the state trust tract. The degree of risk varies substantially based on season, herd demographics, and animal habituation. Younger, non-breeding bison generally presents minimal risk to visitors on foot, as they typically flee when approached. Conversely, mature bison, particularly adult bulls during the summer rut and cows protecting newborn calves, exhibit greater unpredictability and territorial aggression. Combined with their ability to reach speeds up to 35 miles per hour, mature bison pose a genuine safety hazard if visitors approach too closely or startle a herd.

Animal habituation also influences safety risks. Bison unaccustomed to human presence on foot typically retreat, whereas habituated animals lose their natural fear, increasing the potential for close-range encounters. Similar risks apply to equestrian users. Bison maintain a dominant social status over horses and are highly territorial, frequently reacting defensively if horseback riders' approach within 50 feet. To minimize conflict, riders and pedestrian visitors must maintain safe buffer distances and remain alert while navigating occupied pastures.

Seasonal Recreation & Infrastructure Impacts
While recreational activity may occur year-round, public use peaks between early September and late November, coinciding with Montana's general big game hunting seasons. Public use remains light throughout most of the year, with maximum visitor density occurring during the final six weeks of the general firearm season.

Infrastructure modifications under the proposed action present minor, manageable recreational impacts. While the presence of electric fencing creates potential navigation hurdles or shock hazards for visitors, warning signage at gates and cattleguards could effectively mitigate these risks. Furthermore, the proposed action includes a net removal of approximately 2.3 miles of interior fence, reducing the overall number of physical barriers, fence crossings, and gate navigations required across the project area.

Impact Determination
Potential recreational conflicts could be managed through public warning signage at primary access points and adaptive management protocols if localized safety issues emerge. Overall, the proposed action is anticipated to have minimal direct, indirect, or cumulative impacts on recreational resources and public safety on State Lease 6732.

21. DENSITY AND DISTRIBUTION OF POPULATION AND HOUSING:
Estimate population changes and additional housing the project would require. Identify direct, indirect, and cumulative effects to population and housing.

Implementation of the Action Alternative would have unmeasurable direct, indirect or cumulative effects on the density and distribution of population and housing.

22. SOCIAL STRUCTURES AND MORES:
Identify potential disruption of native or traditional lifestyles or communities.

The scoping period revealed that individuals with tribal affiliations are interested in and generally supportive of the proposed project. The desire of these individuals to see an increase in bison on the landscape that would align with the implementation of the Alternative A.

23. CULTURAL UNIQUENESS AND DIVERSITY:

How would the action affect any unique quality of the area?

The project proponent attests that its mission and operations contribute directly to the local economy by enhancing public recreational access, delivering ecological benefits, and generating tourism and revenue for surrounding rural communities. Implementation of Alternative A would potentially have a low level and beneficial, direct, indirect and cumulative effect on the cultural uniqueness and diversity of the area.

24. OTHER APPROPRIATE SOCIAL AND ECONOMIC CIRCUMSTANCES:

Estimate the return to the trust. Include appropriate economic analysis. Identify potential future uses for the analysis area other than existing management. Identify direct, indirect, and cumulative economic and social effects likely to occur as a result of the proposed action.

If APF's proposal is approved, the trust beneficiaries would not receive additional revenue because of the change of class of livestock to bison and cattle, as the lease rates are based on a per AUM basis, regardless of the class of livestock.

EA Checklist Prepared By:	**Name:**	Parker Osterloh	**Date:**	10/22/2026
	Title:	Lands Section Supervisor – Ag and Grazing		
	Name:	Jeff Schmalenberg		
	Title:	Resource Management and Planning Supervisor		
	Name:	Patrick Rennie		
	Title:	DNRC Archeologist		

V. FINDING

25. ALTERNATIVE SELECTED:

Alternative A will not result in significant environmental impacts if APF is authorized to change the class of livestock from cattle to bison and cattle, and proceed with the proposed fence construction, reconstruction, and modification associated with State Lease 6732.

26. SIGNIFICANCE OF POTENTIAL IMPACTS:

I have reviewed the Environmental Assessment prepared for APF's 2026 proposal to construct, reconstruct, modify, and remove fencing and to change the class of livestock associated with State Lease 6732 in Phillips County. I have also reviewed the comments submitted and issues identified during the public scoping period regarding this proposal. The purpose of my review was to determine if significant environmental impacts are likely to occur as a result of this action when compared to the status quo, or if further environmental analysis is warranted.

In reviewing this information, I have determined that issues identified which may impact the environment have been adequately dismissed with rationale or properly mitigated to a level that adequately lowers the risk of a significant impact on the environment. It is my determination that the proposed action is not likely to result in significant environmental impacts and further environmental analysis is not warranted.

Factors influencing my decision are as follows.

APF has:

1. A clear responsibility to contain their bison herd under Montana law, regardless of the fence design they utilize.
2. The ability to place fencing improvements on their leased land for the productive use of their lease.

Mitigating factors for issues with a potential impact include:

1) A net removal of non-wildlife friendly fence from the larger cumulative effects analysis landscape, including the conversion of one mile of non-wildlife friendly fence to wildlife friendly fence along the south perimeter of State Lease 6732, ongoing maintenance of two miles of perimeter fence along the north and east perimeter of State Lease 6732, and the construction of half a mile of wildlife friendly fence along the south half of the west perimeter of State Lease 6732.
2) Risk of significant impact due to bison escape can be mitigated by the stipulation that:
    - APF properly maintains the 1 ½ miles of perimeter fence on the south half of the west boundary and south boundary of the state trust land;
    - APF routinely monitors bison while grazing on state land;
    - APF implements rapid response to recapture escaped bison;
    - APF continues to track and report bison escape and cattle incursion data, including: date of escape/incursion; number of bison/cattle involved; the location, cause, and duration of the escape; and, the remedial action taken.

This concludes the MEPA process for the proposal. It does not authorize APF to graze bison on State Lease 6732 or to proceed with the proposed fence construction, reconstruction, or modification associated with State Lease 6732 at this time. Authorization for APF to graze bison requires approval pursuant to Title 77, Mont. Code Ann.

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27. NEED FOR FURTHER ENVIRONMENTAL ANALYSIS:

☐	EIS	☐	More Detailed EA	X	No Further Analysis

EA Checklist Approved By:	**Name:**	Shawn Thomas
	Title:	Forestry and Trust Land Division Administrator
Signature:		**Date:** 10/26/26

February 2, 2025

Department of Natural Resources and Conservation
ATTN: Jocee Hedrick
613 NE Main Street
PO Box 1021
Lewistown, MT 59457

Re: Notice of bison grazing on State Lease #6732; complete application for purposes of MEPA; application for improvements

Dear Jocee,

In 2024, American Prairie acquired 9,578 deeded acres in Phillips County. As part of this transaction, the Seller completed all required documentation to allow State Lease #6732 to be reassigned in connection with the conveyance. The lease was formally approved for reassignment to American Prairie effective July 17, 2024.

American Prairie manages an existing bison herd on lands immediately adjacent to the acquired property. As part of American Prairie's integrated grazing, restoration, and land stewardship program, American Prairie intends to expand that bison herd onto the newly acquired deeded lands and the associated state lease.

This letter serves as formal notice that bison and/or cattle will be grazing on State Lease #6732 in accordance with the lease and Montana law. Although the lease has historically been grazed by cattle, bison are not excluded from use under the lease. The authorized stocking rate for the lease remains 120 Animal Unit Months (AUMs), and American Prairie is not requesting any change to the authorized AUMs as DNRC has historically treated cattle and bison AUMs equally.

American Prairie is aware that, in some instances, DNRC requires an environmental review for changes in grazing use. For instance, in *Ravalli County Fish & Game Ass'n v. Montana Dep't of State Lands*, 273 Mont. 371, 382, 903 P.2d 1362, 1370 (1995), the Montana Supreme Court held that, once the Department of State Lands (now DNRC) learned that grazing had changed from cattle to sheep, DSL had a duty to fully comply with the Montana Environmental Policy Act (MEPA). *See also*, 36.25.127, ARM (requiring DNRC to examine environmental impacts under MEPA when a licensee requests a change to domestic sheep grazing).

Though American Prairie is aware of no statute or administrative rule requiring MEPA analysis for bison grazing, this letter puts DNRC on notice that it intends to begin bison grazing. For purposes of MEPA environmental review, this Notice constitutes a complete application as defined in § 75-1-220(4), MCA. That statute provides that a "complete application" means "an application for a permit, license, or

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other authorization that contains all data, studies, plans, information, forms, fees, and signatures required to be included with the application sufficient for the agency to approve the application under the applicable statutes and rules." I affirm that I have submitted all the required data, studies, plans, information for DNRC to process and approve American Prairie's bison grazing on State Lease #6732. Under Montana law, MEPA's timelines run from the date DNRC receives a complete application. Section 75-1-208(4), MCA.

If you disagree that American Prairie's application is a complete application for purposes of MEPA, please provide written notification to me within 30 days, identifying any deficiencies or requests for additional information. If I do not receive written notification within 30 days, either confirming that the application is complete for bison grazing or notifying me of deficiencies or DNRC's need for additional information, then the application shall be deemed complete for purposes of MEPA review, including MEPA's timelines.

To align grazing rotations across deeded and leased lands, implement planned restoration and stewardship activities, and ensure accurate boundary control, American Prairie is also submitting this letter as a request for fence improvements along the boundaries.

The planned improvements are as follows (see attached map, and improvement request form for details):

- Rebuild approximately one (1) mile of fence along the south boundary; and
- Construct approximately one-half (½) mile of fence along the southern portion of the west boundary. The existing fence configuration currently encloses approximately 120 acres of a neighboring landowner's property within DNRC trust lands. This work will correct that condition and restore the proper boundary alignment between private and state lands.

These actions will also ensure that livestock are properly contained, that grazing occurs within authorized boundaries, and that DNRC trust lands and neighboring properties are managed and protected as intended.

I believe I have included with this letter all the information that is required, but please let me know by March 3, 2026 if you need any additional information for DNRC's records. Please also feel free to reach out to me by phone or email. My contact information is provided below.

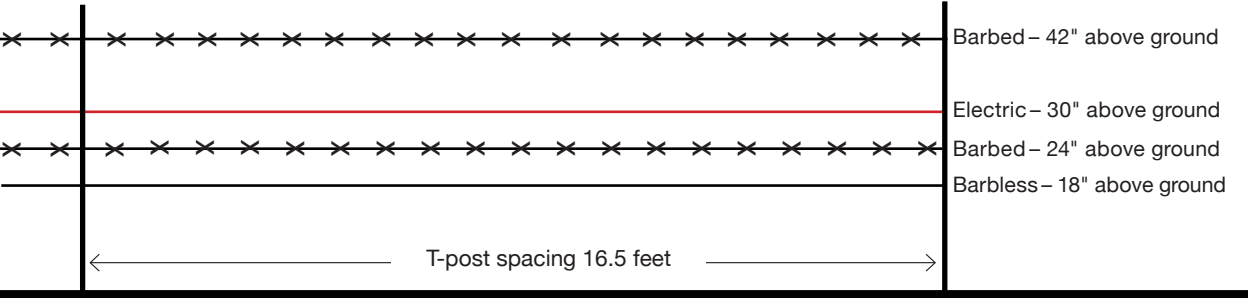
Thanks,

Scott Heidebrink
Director of Landscape Stewardship
scott@americanprairie.org
406-589-6220

AMERICAN PRAIRIE

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Bozeman, MT 59771
406-585-4600

AmericanPrairie.org



Fence diagram

DS - 405
11/12/13

MONTANA DEPARTMENT OF STATE LANDS
IMPROVEMENTS REQUEST FORM

To expedite the processing of requests to place improvements on state lands, please complete the following, if applicable, and indicate on the plat the location of proposed improvements.

Type of improvements; (include type and amount of materials, number of acres, and approximate cost.)

Reconstruct 1 mile of fence to WL Friendly standards (south side) Construct ½ mile of WL Friendly Fence (west side)

Are cost share funds being used for this project? YES / NO

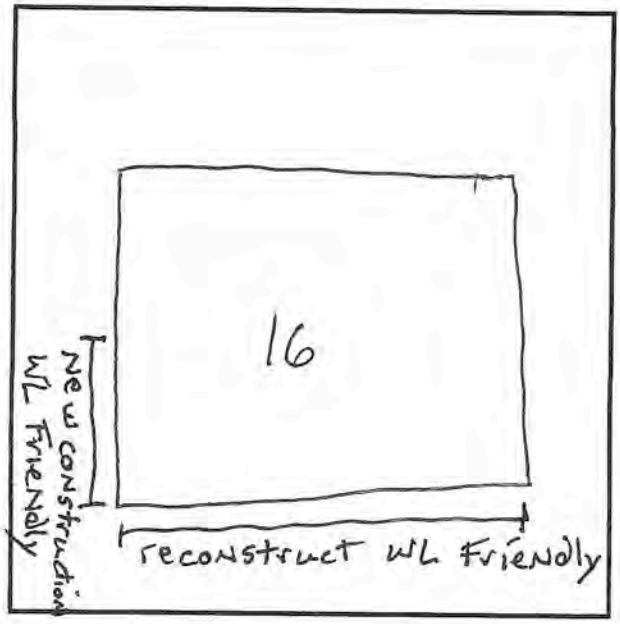
If yes, list source of cost share funding and the amount attributable to the improvements on this state land.

Source: _____

Amount: $ _____

Total out-of-pocket expenses for these improvements on state land.

Amount $ 5,117.62



Township 26 N/S Range 28 E / W Section 16
(Scale: 4" = 1 mile)

This agreement is made upon the express condition that the lessee shall assume all liability for any injury, property damage or loss by any persons, including such loss to any employee or property of lessee, its agents, or third persons, or to the lessee, from any cause or causes arising from placing the above-described improvements on state land. Lessee shall indemnify lessor and save, protect, defend, and hold lessor harmless from any and all liability, loss, damage, expense (including legal expenses and reasonable attorney fees), causes of action, suits, claims or judgments arising from injury to person or property or resulting from or based upon lessor's ownership of the property, which is the subject of this lease, from any cause or causes arising from placing the above-described improvement on state land, and shall, at lessee's own cost and expense, defend any and all suits which may be brought against lessor, either alone or in conjunction with others, upon any such liability or claim(s). Lessee shall satisfy, pay and discharge any and all judgments and fines that may be recovered against lessor in any such action(s).

This request form complies with the intent of Section 77-6-301, MCA, and ARM 36.25.125. Improvements placed on state lands without approval of the Department shall not be recognized as a valid improvement and not subject to the terms and conditions of arbitration.

I hereby request the Department's permission for the above-described practice.

_____ _____
Signature of Lessee/Licensee Date

Agreement (Lease) No. 6732

APPROVAL OF IMPROVEMENTS
(Department Use Only)

MEPA Document Attached: YES / NO

Water Rights Application Required: YES / NO Date Completed: _____ Initials: _____

RECOMMENDATIONS BY AREA LAND OFFICE:

_____

_____

_____

_____

DEPARTMENT OF NATURAL RESOURCES & CONSERVATION

_____ _____
Area Manager / Bureau Chief **Date**

#9361

#9361

#6732

#9361

MIDALE RD

RUDOLPH VALLEY RD

EMOND RD

Big Warm Creek

Beaver Creek

White Rock
DNRC #6732

0 0.25 0.5 1 1.5 Miles

N
W E
S

Fences
- Wildlife Friendly Perimeter Fence
- Interior Fence
- Remove Fence
- Existing Bison Pasture

AP Property Boundaries
- Deeded
- Leased

Other Land Ownership
- BLM
- Private (Non AP)
- State Of Montana

Map Version January 20, 2026

RECEIVED
JUN 11 2026
D.N.R.C.

AMERICAN PRAIRIE

June 9, 2026

Montana Department of Natural Resources and Conservation
Attn: Jocee Hedrik
Northeast Land Office Area Manager
613 NE Main Street
PO Box 1021
Lewistown, MT 59547
Certified mail

Re: Renewed Request to Proceed with MEPA Review for State Lease No. 6732

Dear Jocee:

American Prairie writes to renew its request that the Montana Department of Natural Resources and Conservation proceed with the Montana Environmental Policy Act review process for American Prairie's request to graze cattle and/or bison on State Lease No. 6732.

On February 2, 2026, American Prairie submitted written notice to DNRC regarding State Lease No. 6732. That letter provided notice that American Prairie intended to graze bison and/or cattle on the lease in accordance with the lease and Montana law, confirmed that American Prairie was not requesting any increase or change to the authorized stocking rate of 120 Animal Unit Months, and identified the submission as a complete application for purposes of MEPA review. The February 2 letter also included a request for related fence improvements intended to support proper boundary alignment, livestock containment, and responsible management of the leased lands.

On February 26, 2026, DNRC responded that, at the February 17, 2026 Land Board meeting, the Land Board directed DNRC to develop a rulemaking package regarding grazing lease stocking rates that also addresses the absence of bison from existing provisions. DNRC further stated that, until the rule revision process is complete, DNRC would not authorize any new or pending requests for a change of livestock class to bison, including American Prairie's request for State Lease No. 6732.

Since DNRC's February 26 response, the Montana Supreme Court has issued its June 4, 2026 Order denying DNRC's motion to stay the District Court's order requiring DNRC to complete the MEPA process for another American Prairie grazing lease application. In denying the stay, the Court recognized that DNRC had not been ordered to approve American Prairie's application, but rather to complete environmental review. The Court also recognized that allowing the MEPA process to proceed does not decide DNRC's ultimate decision on the application.

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In light of that decision, American Prairie respectfully requests that DNRC likewise proceed with MEPA review for State Lease No. 6732. American Prairie is not asking DNRC to bypass any applicable environmental review or to predetermine the outcome of the application. Rather, American Prairie is requesting that DNRC process the February 2, 2026 submission through the applicable MEPA process so that the request can be evaluated on its merits and within the framework required by Montana law.

American Prairie believes the February 2, 2026 submission contains the information necessary for DNRC to begin MEPA review. However, if DNRC now believes additional information is needed to process the Lease No. 6732 request, within ten (10) days from the date of this letter please identify the specific information requested so American Prairie can respond promptly.

American Prairie remains willing to coordinate with DNRC staff regarding the appropriate scope, timing, and procedural steps for MEPA review, as well as the related improvement request for Lease No. 6732. We appreciate DNRC's attention to this matter and respectfully request confirmation that DNRC will move forward with the MEPA process for State Lease No. 6732.

Sincerely,



Scott Heidebrink

cc: Director Kaster, PO Box 201601, Helena, MT 59620

PO Box 908
Bozeman, MT 59771
406-585-4600
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In light of that decision, American Prairie respectfully requests that DNRC likewise proceed with [a] MEPA review for State Lease No. [illegible] American Prairie [illegible] DNRC to bypass any applicable [illegible] to predetermine the outcome of the application [illegible] American Prairie [illegible] the February [illegible], 2023 [illegible] through the [illegible] process so that the [illegible] can be evaluated on its merits and within [illegible] Montana law.

[illegible] MEPA review [illegible] now [illegible] Please [illegible] specific information requested so American Prairie can respond promptly [illegible]

American Prairie remains willing to coordinate with DNRC staff regarding [illegible] and [illegible] MEPA review [illegible] as well as the related [illegible] request [illegible] DNRC's attention to this matter [illegible] with the MEPA [illegible]

Sincerely,

Scott Hutchins

cc: [illegible] PO Box [illegible], Lewistown, MT [illegible]

Via Email Only

August 4, 2026

American Prairie
C/O Mary E. Cochenour
Cochenour Law, PLLC
7 West 6th Avenue, Suite 4I
PO Box 1914
Helena, MT 59624
(406) 422- 8716
mary@cochenourlawoffice.com

Re: Bison Grazing/Improvement Request State Lease 6732: Extension of Montana Environmental Policy Act (MEPA) Environmental Review Timeline

Greetings Mary:

The Montana Department of Natural Resources and Conservation (DNRC) writes to provide notice that it is extending the MEPA timeline for review American Prairie's Bison Grazing/Improvement Request State Lease 6732 (2026 Request) by 45 days pursuant to § 75-1-208(5), MCA. As previously advised, DNRC is treating June 11, 2026, as the date a complete request was received. The deadline for completion of an EA is extended to Monday, October 26, 2026.

Although DNRC is treating the 2026 Request as complete, it needs additional information from American Prairie for its analysis.

1. The Improvements Request Form submitted with 2026 Request proposes to "Reconstruct 1 mile of fence to WL friendly standards (south side)". The "White Rock DNRC # 6732" map submitted with the 2026 Request identifies the proposed 1 mile of reconstructed fence on the south boundary of the state trust land (STL) and the ½ mile of newly constructed fence along the west boundary of the STL using the same dotted green line.

   It's DNRC's understanding that the south boundary of the STL is currently unfenced and there is an existing fence that continues diagonally from the fence being removed to the west of the STL through the BLM property to the south of the STL. The location of the existing fence is reflected by the blue line added to the attached White Rock DNRC # 6732 map.

   a. Explain whether the existing fence identified in blue is being removed.

b. Explain which fences are being reconstructed as wildlife friendly fences and which fences will be newly constructed wildlife friendly fences within the larger project area.

c. Resubmit the White Rock DNRC # 6732 map with color delineations for newly constructed wildlife friendly fencing and reconstructed wildlife friendly fencing.

2. DNRC circled four areas on the attached White Rock DNRC # 6732 map where the exterior fence encloses private or BLM land into the interior perimeter of the larger area proposed for bison grazing accessible from the STL.

   a. Confirm the accuracy of the fencing location in the areas circled in red on the White Rock DNRC # 6732 map.

   b. Explain any agreements or authorizations American Prairie has to graze bison on the private or BLM property enclosed by the fencing in the areas circled in red on the White Rock DNRC # 6732 map.

3. The STL subject to State lease 6732 includes two reservoirs and a stock water tank in the N2N2 of section 16.

   a. Please describe in narrative form, or identify on the White Rock DNRC # 6732, other water sources accessible to bison or cattle grazing on the larger pastures created by removal of fencing on the north and east boundary of the STL.

Please have American Prairie submit the requested information to DNRC on or before August 11, 2026. If this is not feasible, provide me with a date by which American Prairie can respond.

Regards,

Brian Bramblett
Chief Legal Counsel
Department of Natural Resources and Conservation

#9361

#9361

#6732

#9361

MIDALE RD

RUDOLPH VALLEY RD

EMOND RD

Big Warm Creek

Beaver Creek

White Rock
DNRC #6732

0 0.25 0.5 1 1.5 Miles

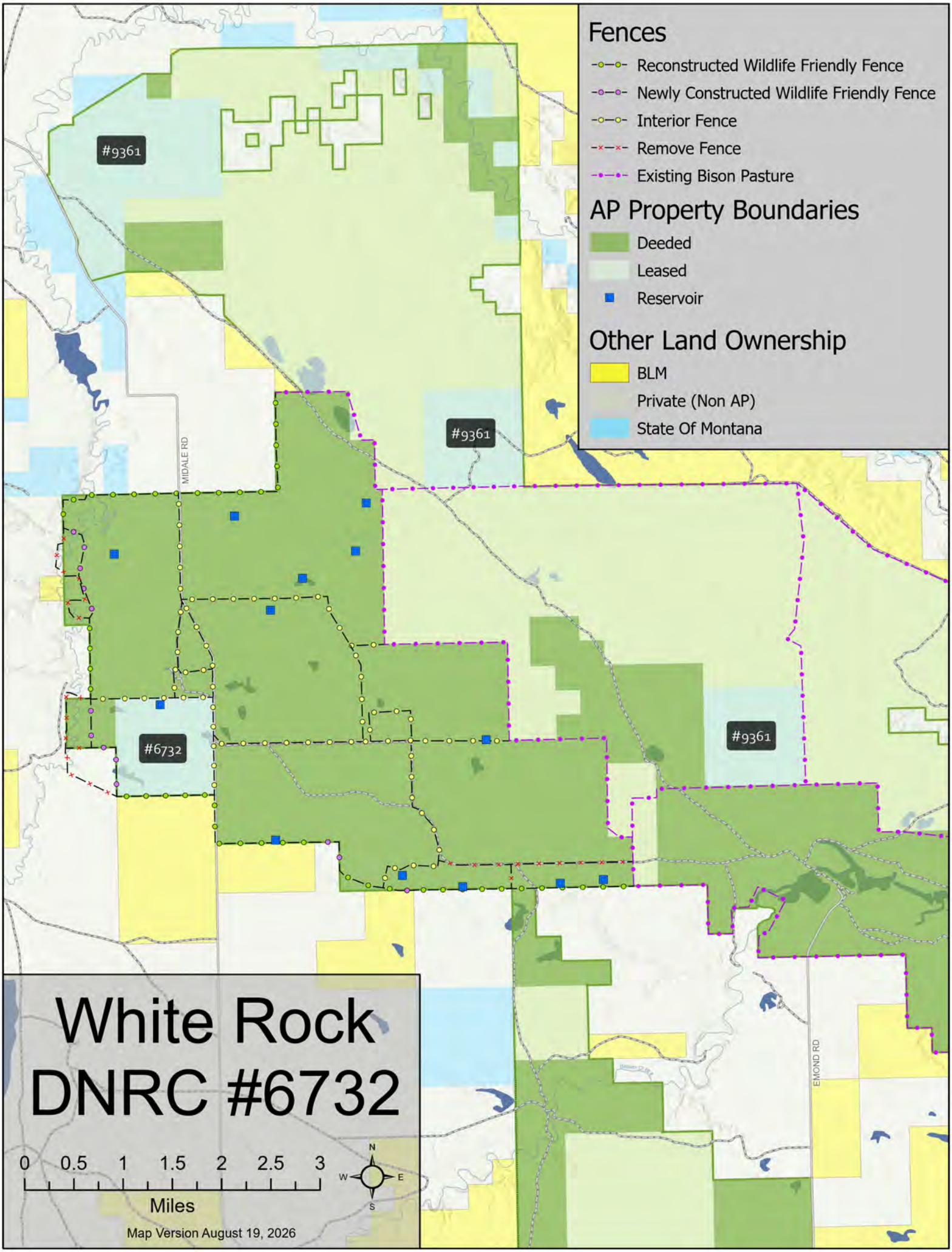
N
W E
S

Fences
- Wildlife Friendly Perimeter Fence
- Interior Fence
- Remove Fence
- Existing Bison Pasture

AP Property Boundaries
- Deeded
- Leased

Other Land Ownership
- BLM
- Private (Non AP)
- State Of Montana

Map Version January 20, 2026


Fences
Reconstructed Wildlife Friendly Fence
Newly Constructed Wildlife Friendly Fence
Interior Fence
Remove Fence
Existing Bison Pasture
AP Property Boundaries
Deeded
Leased
Reservoir
Other Land Ownership
BLM
Private (Non AP)
State Of Montana
#9361
#9361
#9361
#6732
MIDALE RD
EMOND RD
White Rock
DNRC #6732
0 0.5 1 1.5 2 2.5 3
Miles
N
W
E
S
Map Version August 19, 2026

AMERICAN PRAIRIE

August 20, 2026

Brian Bramblett
Chief Legal Counsel
Montana Department of Natural Resources and Conservation

Re: State Lease 6732 – Response to August 4, 2026 Request for Additional Information

Dear Mr. Bramblett:

American Prairie submits the following additional information in response to DNRC's August 4, 2026 letter concerning American Prairie's Cattle and/or Bison Grazing/Improvement Request for State Lease 6732. For ease of review, the responses below follow the numbering used in the DNRC's letter.

1. Fencing

a. Existing fence shown in blue. American Prairie staff completed a field visit to State Lease 6732 and the surrounding deeded ground on August 18, 2026. During this field visit, American Prairie confirmed that a fence is present along the southern boundary of State Lease 6732. The fence identified by the DNRC in blue on the White Rock DNRC #6732 map is located on land that American Prairie neither owns nor holds under a lease or grazing permit. With the presence of an existing fence along the south boundary of State Lease 6732, American Prairie does not propose to remove or otherwise alter that blue-line fence.

b. Reconstructed and newly constructed wildlife-friendly fencing. Based on the August 18th field visit, the approximately one-mile fence segment along the south boundary of the State trust land will be reconstructed as wildlife-friendly fencing. Additionally, American Prairie does not propose to remove the fences along the north or east boundaries of State Lease 6732, but will modify these fences to wildlife-friendly fencing standards. The approximately one-half-mile segment along the west boundary will be newly constructed wildlife-friendly fencing. The revised Fence Map separately identifies the reconstructed and newly constructed segments within the larger property area.

- **Reconstructed wildlife-friendly fencing:** existing fencing that will be modified or rebuilt to wildlife-friendly specifications following the recommendations set forth in Montana Fish, Wildlife & Parks in *A Landowner's Guide to Wildlife Friendly Fences* (2d ed. 2012).

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406-585-4600
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- **Newly constructed wildlife-friendly fencing:** fencing that is not currently present on the landscape and will be newly installed to wildlife-friendly specifications.

All newly constructed and reconstructed fence segments will be constructed in accordance with applicable Montana legal-fence requirements, including § 81-4-101, MCA, and consistent with the wildlife-friendly fencing guidance published by Montana Fish, Wildlife & Parks in *A Landowner's Guide to Wildlife Friendly Fences* (2d ed. 2012). American Prairie has a clear commitment to following both legal-fence requirements for livestock containment and wildlife friendly guidelines. The attached Fence Diagram was provided previously, but are provided again for quick reference. This Fence Diagram identifies the proposed specifications.

c. Updated map. The attached revised White Rock DNRC #6732 Fence Map uses separate color delineations and labels for newly constructed wildlife-friendly fencing and reconstructed wildlife-friendly fencing. The map reflects the best available database information together with field-verified, ground-truthed information collected during the August 18, 2026 site visit. I am available to perform an in-person site visit with DNRC staff, if DNRC is so interested.

2. Areas Circled in Red on the White Rock DNRC #6732 Map

a. Fence locations. The fence locations shown in the four areas that were circled in red on your map have been addressed and now fall within the property boundary lines. American Prairie has discussed all fencing changes with the neighboring land manager and has agreed on all changes made to fencing along our boundary. The original map was prepared during the winter of 2026, when portions of the area were inaccessible; the map included with this letter is accurate and has been ground-truthed during the August 18th field visit.

3. Water Sources and North/East Fence Improvements

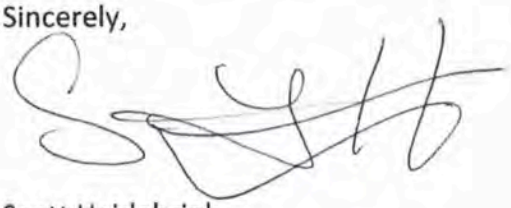
a. Water sources. The water sources available on the surrounding pasture configuration include nineteen stock water rights and one wildlife water right appurtenant to the Property. There are two BLM wildlife and stock water rights that include a place of use on the Property, 40M 74702 00 and 40M 74704 00, and one stock water right appurtenant to the State lease in Section 16, T26N R28E , 40M 30162091. As indicated above, the fences will remain on the north and east boundary of #6732.

Additionally, It is my understanding from past conversation with DNRC staff that improvements on trust land, including fences and gates are owned by lessees. Please confirm this. American Prairie staff attempted to view any relevant files on lease 6372 at the Northeast Land Office but was unable to review the file at the time. Please provide any relevant information of all improvements made to lease 6732 throughout the history of the lease.

If any additional information, changes or clarifications to water infrastructure, fence or other aspects of the property are needed please let me know.

PO Box 908
Bozeman, MT 59771
406-585-4600
AmericanPrairie.org

Sincerely,



Scott Heidebrink
Director of Landscape Stewardship
American Prairie

PO Box 908
Bozeman, MT 59771
406-585-4600
AmericanPrairie.org

2026 American Prairie Bison Grazing Application
Summary of scoping comments

This document contains a public comment summary on American Prairie's request to modify State Lease 6732 south of Malta to allow bison and/or cattle grazing and to make associated fencing changes. The comments are supportive, with a smaller group opposing bison grazing or seeking a more rigorous review.

Overall sentiment

- **Support.** Most commenters urge DNRC to approve American Prairie's application, often explicitly supporting both the livestock-class change and proposed fence construction, reconstruction, removal, and electrification.
- **Opposition is limited but clear.** Some ask DNRC to deny the request, keep the lease cattle-only, or prohibit bison grazing on public/state land.
- **A separate procedural group** focuses less on a yes/no position and more on requiring a fuller environmental analysis before DNRC acts.

Main themes supporting approval

- **Bison as a native ecological fit.** Comments describe bison as historically native to Montana's prairies and argue that their grazing, movement, wallowing, nutrient cycling, and seed dispersal can improve grassland diversity, soils, water retention, wildlife habitat, and ecosystem resilience.
- **Science over politics.** A recurring message is that DNRC should make a science-based, site-specific decision informed by environmental review and prior management experience—not political pressure or favoritism toward cattle producers.
- **Equal treatment as livestock.** Numerous commenters contend that bison should be treated comparably to cattle under grazing leases if operators comply with relevant standards for fencing, stocking, animal health, disease testing, branding, and stewardship.
- **American Prairie's management record.** Supporters cite what they see as American Prairie's responsible management over roughly two decades, including conservation-oriented grazing, cooperation with neighboring ranchers, public recreation, hunting access, and care for range conditions.
- **Multiple-use public benefits.** Supporters argue that state trust lands should simultaneously support agricultural production, school-trust revenue, wildlife, conservation, recreation, hunting, tourism, and rural communities.
- **Economic and trust-land rationale.** Comments state that, if bison grazing generates appropriate lease revenue and does not harm the land, the identity of the livestock should not matter. Several also point to bison-related tourism, recreation, hunting, food production, and local spending.
- **Fencing support.** The proposed wildlife-friendly fencing and electrification are presented as practical safeguards for containment, boundary management, and wildlife movement.

Concerns and opposition

- **Cattle-only or private-land-only view.** Commenters oppose bison on state or public lands and argue that the leases should remain for production agriculture or cattle grazing.
- **Skepticism of American Prairie.** Opponents characterize the project as a wealthy or "billionaire" conservation effort and express concern that it could displace traditional ranchers or place public land under undue influence.
- **Public-access concerns.** At least one commenter expressed support for grazing on full market-rate fees and unrestricted public access for activities such as hunting and camping.
- **Concerns about bison impacts.** Commenters raise concerns about land degradation, limited bison harvest, fencing, disease, or the appropriateness of bison grazing on public land.

Environmental-review requests

The most detailed critical comments request a more comprehensive environmental assessment rather than a checklist-style review. Specific requests include:

- Evaluate the proposal as part of a broader connected and cumulative grazing program, rather than viewing the 640-acre lease in isolation.
- Analyze potential effects of uncertainty surrounding adjacent federal grazing authorizations and possible redistribution of bison.
- Verify whether the existing 120 AUM carrying capacity—originally set for cattle—can appropriately apply to bison.
- Specify the proposed season of use, whether cattle and bison would be grazed together or alternated, and the resulting stocking and distribution patterns.
- Assess water resources, riparian areas, wetlands, soils, vegetation, wildlife, cultural resources, and long-term monitoring data.
- Evaluate fencing based on containment performance, including power reliability, maintenance, failure response, recovery responsibility, and impacts on neighboring lands.
- Make technical assumptions, specialist roles, alternatives, and supporting rationale transparent to the public.

Concise takeaway
The comment record favors approval of American Prairie's bison-grazing and fence-improvement request. Supporters frame it as a lawful, ecologically beneficial, economically compatible, and multiple-use-oriented use of Montana state trust lands; opponents favor cattle-only or non-public-land grazing; and the most substantive cautionary comments call for a fuller, transparent, science-based environmental review before approval.

Based on a review of all 280 submitted comments, approximately 95% support the project and 5% oppose it. This counts comments by their stated position on American Prairie's proposal to allow bison and/or cattle grazing on State Lease 6732 and make fencing changes.

Support vs Opposition Breakdown

Position	Number of comments	Percentage
Support	266	95.0%
Oppose	12	4.3%
Neutral / conditional / procedural only	2	0.7%
Total	**280**	**100.0%**

Support vs Opposition by Residency Status

Residency	Total Responses	Supportive	Opposed	Unclear / no stated position	Supportive percentage
Montana residents	257 (92%)	237	10	10	92.2%
Nonresidents	23 (8%)	21	0	2	91.3%
Total	**280**	**258**	**10**	**12**	**92.1%**

If considering only comments that took a clear **support-or-oppose** position, the result is:

- **Support:** 266 of 278 = **95.7%**
- **Oppose:** 12 of 278 = **4.3%**

Classification Note

Comments requesting a full or expanded environmental review were classified as **supportive** when they also expressly supported approval or continued bison grazing, including comments that requested approval only if the review confirms the project's environmental safeguards. Two comments were categorized as neutral/conditional because they did not clearly advocate approval or denial of this specific proposal.

Appendix C: Issue Statement Development

The following table outlines the fifteen individual issue statements that were developed from comments received from public scoping of the proposed action from August 26, 2026, through September 9, 2026. Issues that were analyzed in detail are presented in the environmental assessment. Rational is provided below for the issues that were dismissed further analysis.

Resource	Issue Statement	Analyzed or Dismissed	Rationale for Dismissing Issue
Wildlife	There is a concern proposed fence construction plan may alter wildlife migration and movement.	**Analyzed**	N/A
Wildlife	There is a concern the proposed action may degrade wildlife habitat quality.	**Analyzed**	N/A
Wildlife	There is a concern the proposed fence construction plan may be inadequate to contain bison.	**Analyzed**	N/A
Wildlife	There is a concern the proposed action may present animal-health or disease-transmission risks, such as brucellosis transmission or other animal-health effects to cattle or wildlife.	**Dismissed**	Issue is dismissed due to mitigation
Wildlife	There is a concern the proposed action may degrade sage-grouse habitat.	**Dismissed**	Issue is dismissed due to mitigation
Economics	There is a concern the proposed action may affect local or regional economic conditions, including agricultural operations, tourism, recreation-related activity, and rural communities.	**Dismissed**	Issue dismissed because of scale and scope of the proposed action
Economics	There is a concern the proposed action may affect revenue to state trust beneficiaries.	**Dismissed**	Livestock Type will not affect revenue to state trust beneficiaries. Lease rates are based on a per AUM basis. Lease 6732 is for 120 AUMs, regardless of livestock type
Economics	There is a concern the proposed action may affect adjacent land uses.	**Dismissed**	Issue dismissed as the scale and scope of the proposed action on a single lease will unlikely affect surrounding land use patterns.
Vegetation	There is a concern the proposed grazing management plan and associated lease terms may affect the long-term ecological condition and productivity of the rangeland.	**Analyzed**	N/A

Water Resources	There is a concern the proposed action may affect water quality and watershed function.	**Analyzed**	N/A
Soil Resources	There is a concern the proposed action may increase soil compaction and erosion, decreasing soil productivity.	**Analyzed**	N/A
Public Access/Recreation	There is a concern the proposed action may affect public recreation and/or public access to the state trust land.	**Analyzed**	N/A
Grazing	There is a concern the proposed action animal unit equivalents for bison will cause degraded range conditions.	**Analyzed**	N/A
Archeological	There is a concern the proposed action may affect cultural or archaeological resources.	**Analyzed**	N/A
Cumulative Effects	There is a concern the proposed action may cumulatively affect range condition on adjacent deeded, state, and federal lands.	**Analyzed**	N/A

MONTANA DEPARTMENT OF
NATURAL RESOURCES & CONSERVATION
TRUST LAND MANAGEMENT DIVISION

FIELD EVALUATION FORM

Special Conditions (Please leave blank if none):

LEASE: 6732 **SEC:** 16 **TWP:** 26N **RNG:** 28E
COUNTY: Phillips **EXPIRES:** 28-Feb-19
LEGAL DESCRIPTION↓ **GRANT:** Common Schools
ALL

COMMERCIAL NAME: FRENCH, WILLIAM R
LAST: **FIRST:** **MI:**
ADDRESS : 37737 CONTENT RD
:
CITY: MALTA **ST:** MT **ZIP:** 59538-
PHONE NUMBER
(406) 658-2604

SAGE-GROUSE HABITAT	UNDER A CURRENT COMPETITIVE BID IF BOX AT RIGHT IS CHECKED
☑ CORE	☐
☐ GENERAL	
☐ CONNECTIVITY	

SPECIAL TERMS IN EFFECT THROUGH END OF CURRENT LEASE TERM
Percent Rate Item

PAST FIELD FINDINGS		PRESENT FIELD FINDINGS	
640.00	**TOTAL ACRES**	640.00	
0.00	**AGRICULTURE**		**TYPE OF CROP(S):**
0.00	**CRP**		**SPECIES:**
0.00 HWC 0.00	**HAY**		**SPECIES:**
640.00	**GRAZING**	640.00	**USE:** Summer pasture
0.00	**UNSUITABLE**		**EXPLANATION:**
0.00	**OTHER**		**EXPLANATION:**
GRAZING 127 AFTERMATH 0 TOTAL 127	**AUMS**	120	**GRAZE:** 120 **CROP/HAY AFTERMATH:** 0

RENEWAL LEASE TERM: ☑ 10 YR. ☐ 5 YR. ☐ OTHER: YEAR(S)

RESTRICTED GRAZING SEASON: FROM **TO**

DEVELOPMENTS NOTED: POWERLINE ☐ ROAD ☑ MISSILE CABLE ☐
PHONE CABLE ☐ PIPELINE ☐ SEPTIC/SEWER ☐ OTHER ☐

MINERAL ACTIVITY:

COMMENTS

AREA OFFICE RECOMMENDATION ON LAND USES: Renew as a 10-year Grazing Lease

COMMENTS

FOLLOWUP ACTION REQUIRED: YES ☐ NO ☑
MANAGEMENT PLAN: YES ☐ NO ☑
TYPE: None

OTHER ACTION NEEDED: No Other Actions Necessary

WHO WAS CONTACTED? Lessee **PHONE** ☐ **LETTER** ☑ **PERSONAL** ☐

LAND USE SPECIALIST: Jack Medlicott **DATE OF APPRAISAL:** 15-Jun-2018

RANGE EVALUATION

Date: 15-Jun-2018

Lease: 6732 **County:** Phillips **Sec:** 16 **Twp:** 26N **Rge:** 28E

Legal: ALL

Specialist: Jack Medlicott

Lessee: FRENCH, WILLIAM R

Grant: Common Schools

Geographic Area: Eastern Glaciated Plains **Precip Range:** 10 to 14 inches

Site Abbreviations & Base Rates

Species	Ps	0.25	Si	0.35								
PASM	15	15	19	19	0	0	0	0				
NAVI	2	2		0	0	0	0	0				
SCSC		0		0	0	0	0	0				
MUCU		0		0	0	0	0	0				
CALO		0		0	0	0	0	0				
SPPE		0		0	0	0	0	0				
HECO	3	3	8	8								
BOGR	5	5	2	2								
KOMA	10	5	11	5								
POSE	10	5	11	5								
CAMO												
CAFI	8	5	10	5								
ARCA	4	4	7	5								
ARTR												
SYOC												
INC FORBS	8	5	7	5								
ARFR	8	5	2	2								
OPPO	1	0										
Invaders	12	0	8	0								
AGCR	6	3										
BRIN												
HOJU												
POPR	8	8	15	15								
Noxious Weeds												
TOTALS	100	65	100	71	0	0	0	0	0	0	0	0

Site Description and Comments:

Lots of cheatgrass throughout tract

Large wet depressions consist of sedges/ rushes, lumped with silty

INC FORBS	*(Enter below)*			
INV FORBS	*(Enter below)*			
SHRUBS	*(Enter below)*			

NOXIOUS (Check if present or list below)

Leafy spurge	Canada thistle	Field bindweed	Dalmation toadflax
Whitetop	Houndstongue	Yellow toadflax	Spotted knapweed
Saltcedar	St. Johnswort	Diffuse knapweed	Sulphur cinquefoil
			Russian knapweed

Other Noxious Weeds (list)

RANGELAND AUMs

SITE	ACRES	BASE RATE	PERCENT	AUMs/AC	SITE AUMs
No. 1	289.43	0.25	65%	0.163	47.0
No. 2	256.67	0.35	71%	0.248	63.8
No. 3		0.00	0%	0.000	0.0
No. 4		0.00	0%	0.000	0.0
No. 5		0.00	0%	0.000	0.0
No. 6		0.00	0%	0.000	0.0
TOTAL ACRES & AUMS FROM ABOVE				546.10	110.8
TOTAL ACRES & AUMs FROM SUPPLEMENTAL PAGE(s)				0.00	0.0
TAME PASTURE ACRES & AUMs FROM RIGHT				93.90	9.4
AUM SUBTOTAL					120.2
AFTERMATH AUMs FROM RIGHT					0.0
TOTAL GRAZING ACRES & AUMs FOR TRACT				**640.00**	**120**

TAME PASTURE AUMs

SITE	ACRES	AUMs/AC	SITE AUMs
No. 1	93.90	0.10	9.4
No. 2			0.0
No. 3			0.0
TOTAL ACRES	93.90	AUM's	9.4

AFTERMATH AUMs

SITE	ACRES	AUMs/AC	SITE AUMs
No. 1			0.0
No. 2			0.0
No. 3			0.0
TOTAL ACRES	0.00	AUMs	0.0



Prairie dog town, reservoir in background



Seasonal wetland



Panspot site

Sage Grouse Habitat Assessment & Grazing Management Worksheet - Silver Sage Only

Lease #: 6732 Lessee: FRENCH, WILLIAM R

County: Phillips Sec: 16 Twp: 26N Rge: 28E

Legal: ALL

Land Use Specialist: Jack Medlicott

Date: 6/15/18

☐ Worksheet includes multiple tracts

☐ All in Lease: or

☐ List:

1. This tract within Core/Connectivity Area is unsuitable habitat and no further assessment will be completed. (Check Applicable Reason):

☐ Sagebrush Canopy Cover is < 1% and Lek Location is > 2.5 miles away.

☐ Tract is Primarily Cropland/Hayland or non-native improved pasture.

☐ Other - Describe:

2. Habitat Assessment — Sagebrush Type(s): For Habitats with Silver Sagebrush Only.

	Suitable Habitat	✓	Unsuitable Habitat	✓
A. Average Sagebrush Canopy Cover	1% - 5%	☑	< 1%	☐
B. Average Sagebrush Height	10" to 40"	☑	< 10" or > 40"	☐
C. Sagebrush growth form	Spreading Form, few dead branches or columnar growth.	☑	Tall, columnar growth with dead branches for most plants.	☐
D. Perennial Grass Cover	> 10%	☑	< 10%	☐
E. Perennial Forb Cover	5% - 10%	☑	< 5%	☐
F. Riparian & Wet Meadow Plant Community ☐ N/A - Not Present on Site	Mesic plant species dominate or some Xeric species present.	☑	Primarily Xeric plant species.	☐
Overall Site Evaluation	Marginal to Good Habitat	☑	Unsuitable Habitat	☐

Habitat Assessment Comments:

Parts of tract do not have enough sage brush to be suitable habitat, but overall the tract is fair habitat. Expansion of cheatgrass is troubling, will likely negatively affect use of the tract by grouse.

3. Grazing Management

Current Year's Growing Conditions: ☑ Above Average ☐ Average ☐ Below Average

Comments: Good spring snow melt and fair amount of precipitation to this point in the growing season

	Interspace	Understory
Average Residual Grass Height (Inches)	☐ 1-3" ☑ 4-6" ☐ 7"+	☐ 1-3" ☐ 3-6" ☑ 7"+
Grazing Has/Is Occurring Yes If Yes, Utilization Level of Current Year's Growth (%)	20	10
Average Condition Class of Applicable Sites from Completed Field Evaluation Form (%).		68

Comments/Other Information on Grazing Management:

Recommendation:

☑ Proper Grazing Management is Occurring and Follow-up is Not Required.

☐ Grazing Management is Impacting Sage Grouse Habitat & a Corrective Action Plan will be Required.

SALINITY PROBLEMS/EXISTING OR POTENTIAL: LAND USE _____ LOCATION _____

SURROUNDING LAND USE: _____ ACRES _____

CONTROL: No Salinty issues on tract

NOXIOUS WEEDS: None

LOCATION:

CONTROL:

UNTILLED & SUITABLE FOR AGRICULTURE: ACRES 0 LOCATION N/A

EROSION PROBLEMS: No Erosion

RIPARIAN
AREA HEALTH: No Riparian Area on Tract

UTILIZATION : ☐ UNUSED 0% ☑ SLIGHT 0-20% ☐ MODERATE 20-40% ☐ FULL 40-50% ☐ CLOSE 50-60% ☐ SEVERE 60-80% ☐ EXTREME 80-100%

APPARENT TREND: UPWARD ☐ DOWNWARD ☐ STATIC ☑

MANAGEMENT NEEDS ON ANY PART, OR USE, OF THIS TRACT

Lease is grazed in pasture with adjacent deeded land and BLM. Grazing use seems to be concentrated on the northern part of tract, near the water, which is near the prairie dog town. This exacerbates the problem of poor vegetation growth around the dog town. There is a large amount of cheatgrass throughout the tract as well. This doesn't seem to be due to overgrazing, since I have noticed a large amount of cheatgrass in the surrounding area in general. I think conditions have been right this year to allow for spread of the cheatgrass, and grazing management on this particular tract is not the issue. This will be something to keep an eye on over the next lease term, but in reality there is little that can be done with the infestation at the point that it already is. If cheatgrass becomes dominant on the lease over the next lease term, a change in management may be necessary.

GENERAL TOPOGRAPHY:

☑ PLAINS ☐ ROLLING HILLS ☐ FOOTHILLS ☐ MOUNTAINS ☐ BREAKS

SURROUNDING LAND USE (Check all that apply): ☑ DRYLAND AG ☐ IRRIGATED AG ☐ CRP ☑ GRAZING ☐ MINING ☐ TIMBER ☐ RESIDENTIAL ☐ COMMERCIAL ☐ WILDLIFE HABITAT/CONS

RECREATION OR POTENTIAL: Excellent Recreation Potential

WILDLIFE OBSERVATIONS: Antelope

ACCESS: ☑ COUNTY ☐ HIGHWAY ☐ PRIVATE ☐ FEDERAL ☐ STATE LEGAL ACCESS: YES

CONDITION OF ROAD: Graveled County High Grade

DISTANCE TO NEAREST LEGAL ACCESS: Immediate

WATER COMMENTS: Good Water on Tract

LIVESTOCK WATER AVAILABLE Reservoirs, seasonal wet depressions, stock tank

PERENNIAL _____ INTERMITTENT _____

RESERVOIR(S) N2N2 PIT(S) _____

SPRINGS: DEVELOPED _____ WELL(S) _____

SPRINGS: NOT DEVELOPED _____

STOCKWATER TANK(S) Near reservoir in N2N2

IRRIGATION WATER AVAILABLE N/A

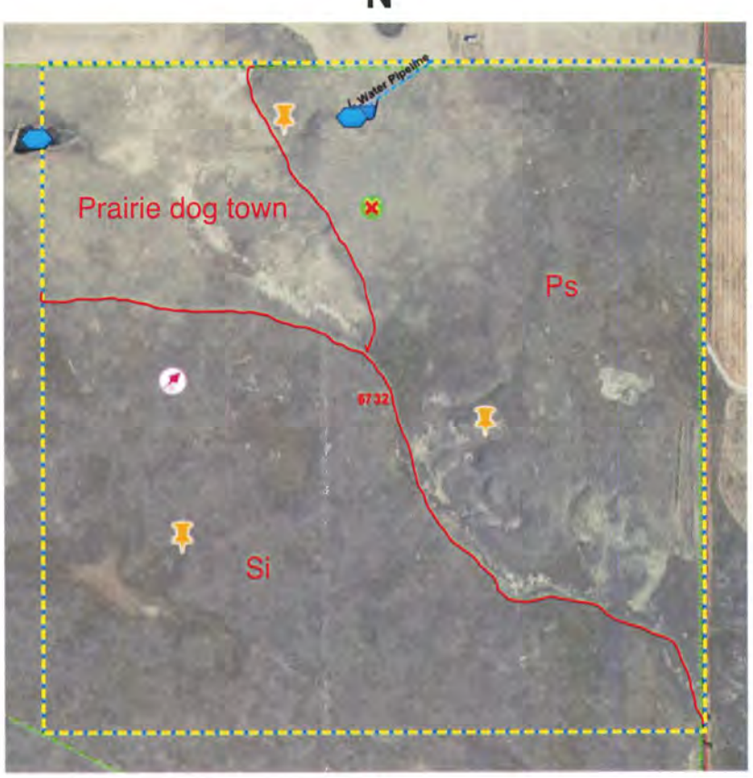
DIVERSION POINT ON ☐ OR OFF ☐ STATE LOCATION: _____

SOURCE NAME

HISTORIC SITES: Cairns throughout tract, many potential stone features, few positively identified

IMPROVEMENTS: 2 miles 3 and 4-wire barbed, 1 steel stockwater tank

N



BLM

USE THIS SYMBOL (p→) TO SHOW WHERE AND WHAT DIRECTION THE PHOTO WAS TAKEN

MONTANA DEPARTMENT OF
NATURAL RESOURCES & CONSERVATION
TRUST LAND MANAGEMANT DIVISION

FIELD EVALUATION FORM

Photo No. 478-61B

LEASE: 6732 **SEC:** 16 **TWP:** 26N **RNG:** 28E
COUNTY: Phillips **EXPIRES:** 2/28/2009
LEGAL DESCRIPTION: ALL **GRANT:** Common Schools

COMMERCIAL NAME: LAZY J 5 RANCH CO
LAST: **FIRST:** **M.I.:**
ADDRESS: P O BOX 246
CITY: MALTA **ST:** MT **ZIP:** 59538-
PHONE NUMBER (406) 658-2190

SPECIAL TERMS IN EFFECT THROUGH END OF CURRENTLEASE TERM:
Percent Rate Item

☐ UNDER CURRENT COMPETITIVE BID TERMS IF BOX AT LEFT IS CHECKED

PAST L#: 6732 16 T26N R28E PAST FINDINGS		PRESENT FIELD FINDINGS	
640.000	TOTAL ACRES	640	
0.000	AGRICULTURE		TYPE OF CROP(S):
0.000	CRP		SPECIES:
0.000 HWC (0)	HAY		SPECIES:
640.000	GRAZING	640	USE: Summer pasture
0.000	GRAZING UNUSED		
0.000	UNSUITABLE		EXPLANATION:
0.000	OTHER		EXPLANATION:
GRAZE 144 AFTMTH 0 TOTAL 144	AUMS	127	GRAZE: CROP/HAY AFTERMATH:

RENEWAL LEASE TERM: 10 YR. ✓ 5 YR. ____ OTHER: ____ YEAR(S)
RESTRICTED GRAZING SEASON: FROM ____ TO ____

DEVELOPMENTS NOTED: POWERLINE ____ ROAD ✓ MISSILE CABLE ____
PHONE CABLE ____ PIPELINE ____ SEPTIC/SEWER ____ OTHER ____
No Right of Way for county road.

MINERAL ACTIVITY: Tract had no mineral activity at the time of inspection.

AREA OFFICE RECOMMENDATION ON LAND USES: I recommend the land use for tract remains as grazing land use.

FOLLOWUP ACTION REQUIRED: YES ____ NO ✓
MANAGEMENT PLAN: YES ____ NO ✓
TYPE:
OTHER ACTION NEEDED: I found no reason to change current management practices.

WHO WAS CONTACTED? No one PHONE ____ LETTER ____ PERSONAL ____
LAND USE SPECIALIST: Randy Dirkson **DATE OF APPRAISAL:** Oct. 19-2007

RANGE EVALUATION

P% = PRESENT; C% = CLIMAX; COMPOSITION % BY WEIGHT (May be clipped or estimated)

SITE NUMBER ONE

RANGE SITE Dense Clay

ACRES 111.2

SPECIES: DECREASERS	P%	C%
Agsm	14	14
Stui	T	
INCREASERS		
Stco	1	
Camo	5	5
Boer	5	5
Kocr	1	
Pose	53	5
Forbs	13	5
Artr	7	
INVADERS		
Hairy Plantain	8	
%COMPOSITION	100%	34%
CONDITION CLASS		Fc

SITE NUMBER TWO

RANGE SITE Panspota

ACRES 528.8

SPECIES: DECREASERS	P%	C%
Agsm	20	20
Stui	2	2
INCREASERS		
Stco	27	27
Camo	5	5
Boer	3	3
Kocr	6	5
Pose	18	5
Forbs	10	5
Sedses	3	3
Arca	7	
INVADERS		
Hairy Plantain	6	
%COMPOSITION	100%	75%
CONDITION CLASS		GC

SITE NUMBER THREE

RANGE SITE _____

ACRES _____

SPECIES: DECREASERS	P%	C%
INCREASERS		
INVADERS		
%COMPOSITION	100%	%
CONDITION CLASS		

SITE NUMBER FOUR

RANGE SITE _____

ACRES _____

SPECIES: DECREASERS	P%	C%
INCREASERS		
INVADERS		
%COMPOSITION	100%	%
CONDITION CLASS		

SITE NUMBER FIVE

RANGE SITE _____

ACRES _____

SPECIES: DECREASERS	P%	C%
INCREASERS		
INVADERS		
%COMPOSITION	100%	%
CONDITION CLASS		

SITE NUMBER SIX

RANGE SITE _____

ACRES _____

SPECIES: DECREASERS	P%	C%
INCREASERS		
INVADERS		
%COMPOSITION	100%	%
CONDITION CLASS		

RANGELAND AUM's

SITE	ACRES	BASE RATE	PERCENT	AUM'S/AC	SITE AUM'S
No. 1	111.2	.2	34%	.068	8
No. 2	528.8	.3	74%	.225	119
No. 3					
No. 4					
No. 5					
No. 6					

AUM'S FROM ADDITIONAL PAGE IF MORE THAN SIX RANGE SITES

TOTAL ACRES 640 TOTAL AUM's FROM ABOVE 127

AUM'S FROM TAME PASTURE CALCULATED AT RIGHT _____

AUM'S FROM AFTERMATH CALCULATED AT RIGHT _____

TOTAL AUMS FOR TRACT 127

TAME PASTURE AUM's

SITE	ACRES	AUM'S/AC	SITE AUM'S
No. 1			
No. 2			
No. 3			
TOTAL ACRES		AUM's	

AFTERMATH AUM's

SITE	ACRES	AUM'S/AC	SITE AUM'S
No. 1			
No. 2			
No. 3			
TOTAL ACRES		AUM's	

Date: Oct. 19-2007

Lease: 6732 **County:** Phillips **Sec:** 16 **Twp:** 26N **Rge:** 28E

Legal: ALL

Specialist: Randy Dickson

Grant: Common Schools

Lessee: LAZY J 5 RANCH CO

File No. 1019174

Species	DC	PS
	111-26	528.8
Agsm	14	20
Stni	T	2
Stco	1	27
Cano	5	5
Bogr	5	3
Koca	1	6
Pose	53	18
Forbs	12	10
Sedges		2
Auca		T
Arfr	1	
FORBS		
INVADER		
Hairy Plantain	8	6
NOXIOUS		

Site Abbreviations

Site Description and Comments:

Site-1-DC: This site consists of a lowlands area with dense clay soils with small inclusions of pansports. Pose is very predominate on much of site. Site is near a livestock water source consintrating grazing use on site. Seed production has occurred on 2007 plant growth. Old Summer pasture.

Site-2-PS: This site consists of flat to gently rolling terrain. Site also contains some small prairie potholes. Decreaser species are scattered throughout site & show good vigor & seed production. The greatest limiting factor on site is Sede. Minimal livestock trailing.

Forbs:

Inc: Cudweed sagewort, Artr, Western yarrow, Vetches, Hood phlox,

Inv:

WATER _____

Additional Comments: _____

RECORD GENERAL OBSERVATIONS

1. Rainfall during the current year:

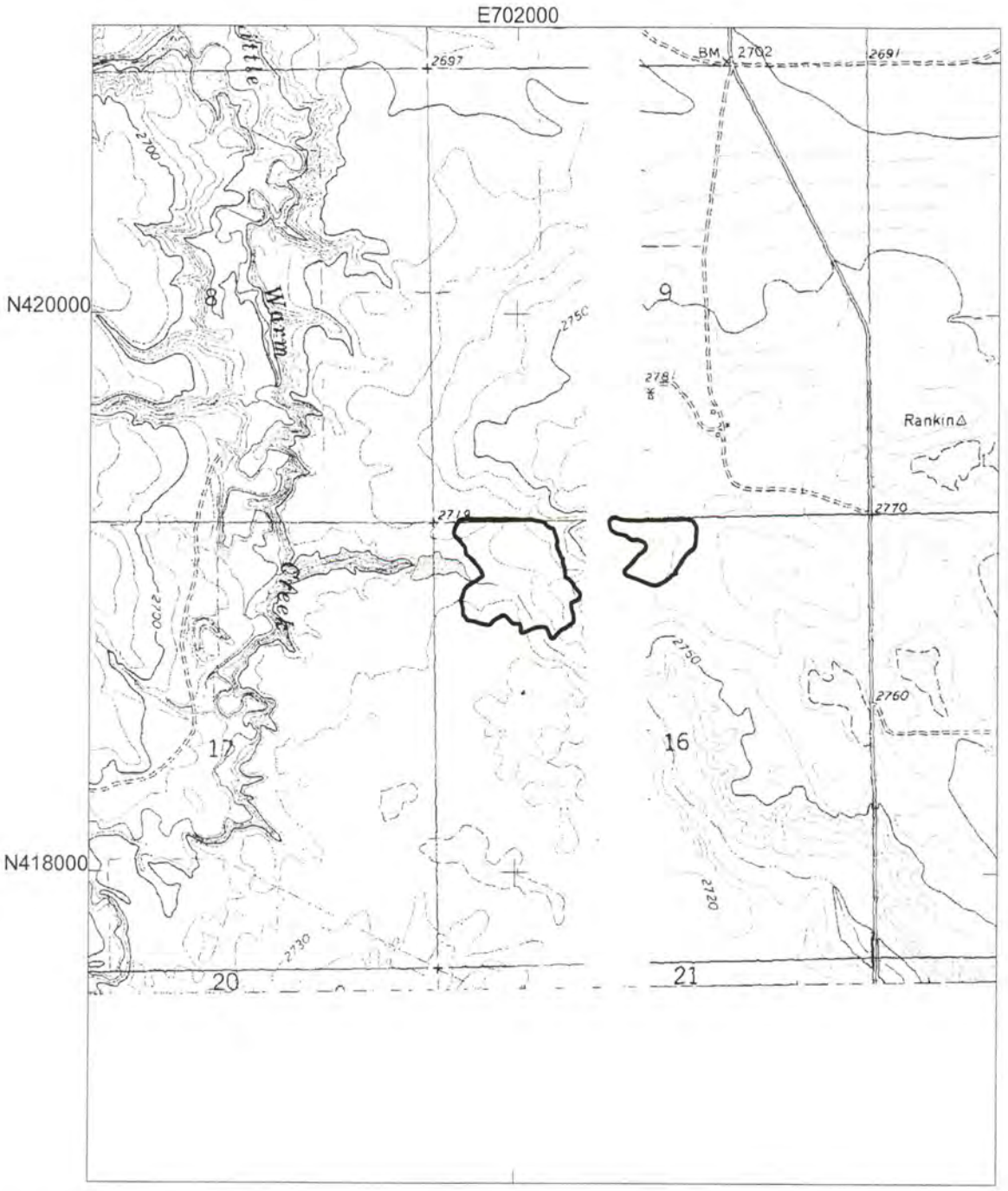
   _____ Way below average
   _____ Slightly below average
   _____ Average
   _____ Slightly above average
   _____ Way above average

2. Describe growing season conditions:

   _____ Above average
   _____ Average
   _____ Below average

3. Describe any unusual ecological events (i.e., insects, fire, hail, etc.)

4. Other comments: _____



16 T26N R28E, Prairie Dog Towns, 46.23 acres

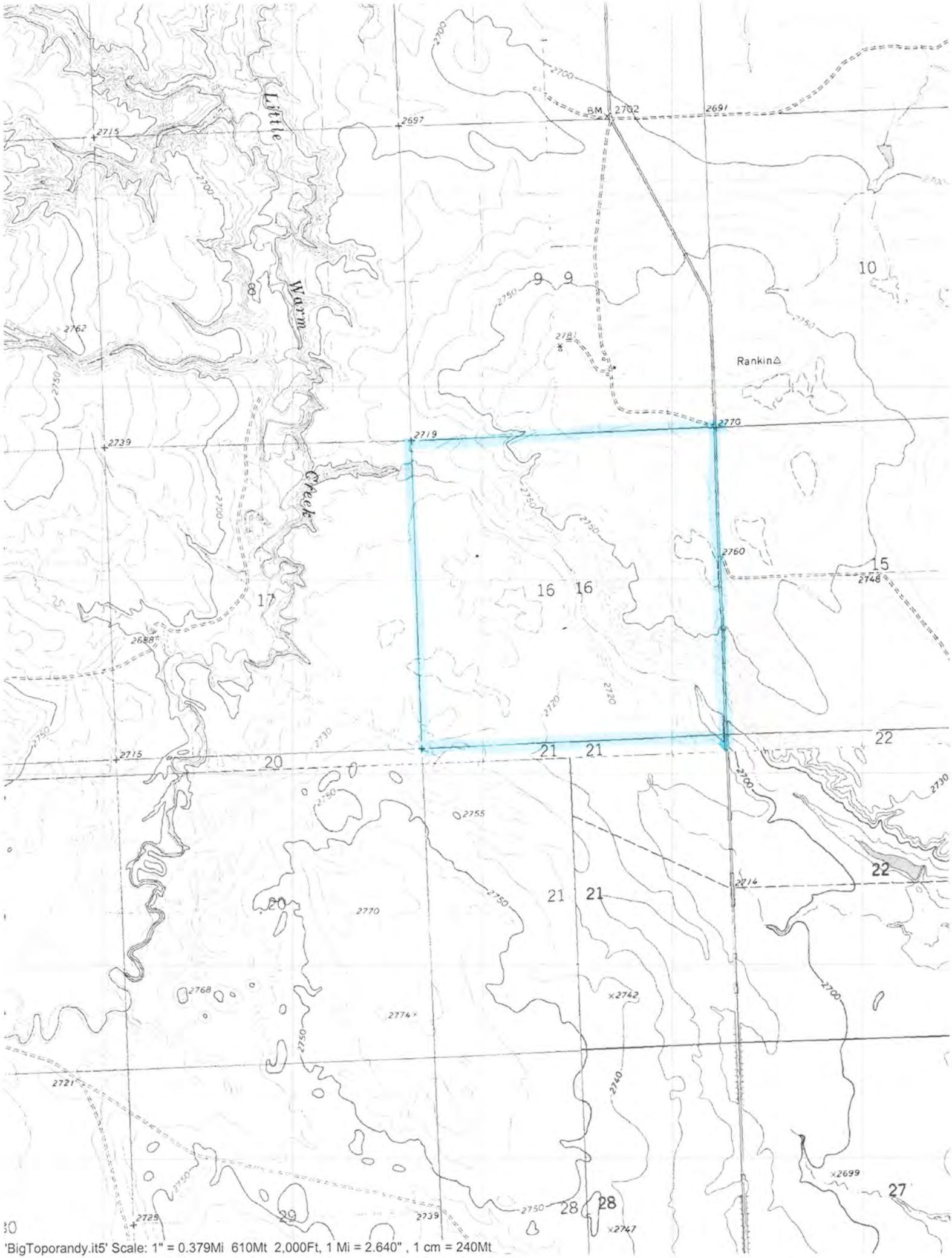
US State Plane 1983
Montana 2500
NAD 1983 (Conus)

N

Scale 1:24,000
0 3,000
Feet

-101914A.ssf
10/24/2007
GPS Pathfinder® Office
Trimble.


A9
16
Dog
Town



'BigToporandy.it5' Scale: 1" = 0.379Mi 610Mt 2,000Ft, 1 Mi = 2.640" , 1 cm = 240Mt

L # 6732

16-26N-28E

SALINITY PROBLEMS/EXISTING OR POTENTIAL: LAND USE _____ LOCATION _____

SURROUNDING LAND USE: _____ ACRES _____

CONTROL METHODS: I found no salinity on tract.

NOXIOUS WEEDS: I found no noxious weeds on tract.

LOCATION:

CONTROL:

UNTILLED & SUITABLE FOR AGRICULTURE: ACRES None LOCATION _____

EROSION PROBLEMS: I found no erosion problems on tract.

RIPARIAN AREA HEALTH: Tract has no riparian sites

UTILIZATION :	UNUSED	SLIGHT	MODERATE	FULL	CLOSE	SEVERE	EXTREME
	(0%)	0-20%	20-40%	40-50%	50-60%	60-80%	80-100%

APPARENT TREND: UPWARD _____ DOWNWARD _____ STATIC _____

MANAGEMENT NEEDS ON ANY PART, OR USE, OF THIS TRACT

Range site one consists of a lowlands area with dense clay soils with small inclusions of panspots. Pose is very predominate on much of site. Site is near a livestock water source consintrating graying use on site. Seed production has occurred on 2007 plant growth. Range site two consists of flat to gently rolling terrain. Site contains some small prairie potholes. Decreaser species are scattered through out site and show good vigor and seed production. The greatest limiting factor on site is Sedc. Minimal livestock trailing.

GEOGRAPHIC AREA (NRCS DESIGNATION): (circle one) ESP WSP (EGP) WGP F&M

PPT. ZONE: 0-9" ~~10-14"~~ 15-19" 20-+"

GENERAL TOPOGRAPHY: ~~(PLAINS)~~ ROLLING HILLS FOOTHILLS MOUNTAINS

SURROUNDING LAND USE (Check all that apply): (DRYLAND AGRICULTURE) IRRIGATED AGRICULTURE (GRAZING) MINING TIMBER RESIDENTIAL COMMERCIAL

RECREATION OR POTENTIAL: Hunting: Antelope & Prairie dogs

WILDLIFE OBSERVATIONS: Antelope.

ACCESS: (COUNTY) HIGHWAY PRIVATE FEDERAL STATE LEGAL ACCESS: (YES) NO

CONDITION OF ROAD: Good condition

DISTANCE TO NEAREST LEGAL ACCESS: County road on east section line

WATER COMMENTS: Reservoir is dry and probably holds minimal water in the spring.

LIVESTOCK WATER AVAILABLE

PERENNIAL _____ INTERMITTENT _____

RESERVOIR(S) less than 1/4 acre, NE¼NE¼NW¼ PIT(S) _____

SPRINGS: DEVELOPED _____ WELL(S) _____

SPRINGS: NOT DEVELOPED _____

STOCKWATER TANK(S) 1 stock tank + water pipeline

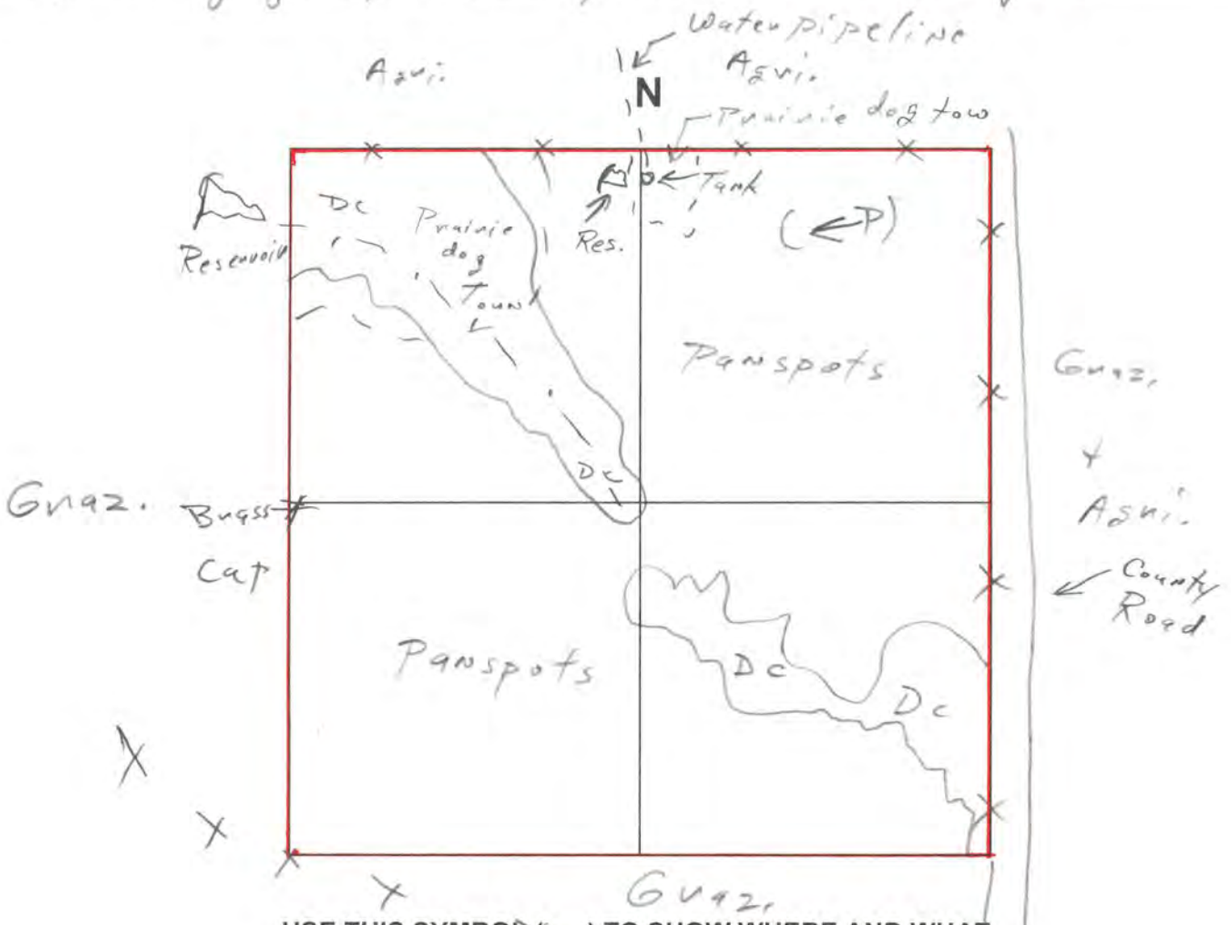
IRRIGATION WATER AVAILABLE

DIVERSION POINT ON OR OFF STATE LOCATION: _____

SOURCE NAME _____

HISTORIC SITES: None found.

IMPROVEMENTS: 1 livestock reservoir
2 miles of fence, 4 wires, wood & steel post



USE THIS SYMBOL (p→) TO SHOW WHERE AND WHAT DIRECTION THE PHOTO WAS TAKEN

MONTANA DEPARTMENT OF NATURAL RESOURCES & CONSERVATION

FIELD EVALUATION FORM

FSA PHOTO NO.: 378-61B
BLM Allotment No. 5421

SEC: 16 TWN: 26.0N ALL RNG: 28.0E LEASE #: 6732 COUNTY: PHILLIPS permittee: Steve & Lori Knudsen

LEGAL DESCRIP:

:

EXPIRES: 1999/02/28

COMMERCIAL NAME: LAZY J 5 RANCH CO

LAST: FIRST: MI:

ADDRESS: P O BOX 246

:

CITY: MALTA STATE: MT ZIP: 59538

PHONE:

VALUE - GRAZING: .000 SHARE - AGRICULTURE: .000000

AGRICULTURE: .000 CRP: .000000

PAST FIELD FINDINGS		PRESENT FIELD FINDINGS	
	TOTAL ACRES	640	
.000	AGRICULTURE		TYPE OF CROP(S):
.000	CRP		SPECIES:
	HAY		SPECIES:
640.000	GRAZING	640	USE: Summer Pasture
.000	GRAZING UNUSED		
.000	UNSUITABLE		EXPLANATION:
.000	OTHER		EXPLANATION:
151.000	AUMS	144	GRAZE: 144 CROP/HAY AFTERMATH:

RENEWAL LEASE TERM: 10 YR. X 5 YR. _____ OTHER: _____ YEAR(S)

RESTRICTED GRAZING SEASON: FROM _____ TO _____

DEVELOPMENTS NOTED: POWERLINE _____ ROAD X MISSILE CABLE _____

PHONE CABLE _____ PIPELINE _____ OTHER _____

Phillips county gravel road - NO ROW

MINERAL ACTIVITY: None observed

AREA OFFICE RECOMMENDATION ON LAND USES: Renew as grazing

FOLLOWUP ACTION REQUIRED: YES _____ NO X

MANAGEMENT PLAN: YES _____ NO X

TYPE:

OTHER ACTION NEEDED:

WHO WAS CONTACTED? Lazy J 5 ranch Postcard PHONE ____ LETTER ____ PERSONAL ____

LAND USE SPECIALIST: R. Hoyt Richards DATE OF APPRAISAL: 5-13-98

RANGE EVALUATION

P% = PRESENT; C% = CLIMAX; COMPOSITION % BY WEIGHT
(May be clipped or estimated)

SITE NUMBER ONE

RANGE SITE PS
ACRES 538.4

SPECIES: DECREASERS	P%	C%
Agsm	23	23
Stvi	4	4
Camo	T	
INCREASERS		
Stco	25	25
Bogr	15	10
Kopy	6	5
Pose	14	5
Caf.	6	5
Aplo	1	1
Chna	1	
Forbs	3	3
INVADERS	2	
%Composition	100%	81 %
Cond. Class	XXX	

SITE NUMBER TWO

RANGE SITE DC
ACRES 101.6

SPECIES: DECREASERS	P%	C%
Agsm	23	23
Stvi	10	10
INCREASERS		
Stco	10	
Bogr	20	
Kopy	3	
Pose	20	5
Caf.	3	
Aplo	1	
Chna	1	1
Forbs	3	3
INVADERS Forbs	2	
Bote	2	
Popu	1	
%Composition	100%	42 %
Cond. Class	XXX	

SITE NUMBER THREE

RANGE SITE
ACRES

SPECIES: DECREASERS	P%	C%
INCREASERS		
INVADERS		
%Composition	100%	%
Cond. Class	XXX	

SITE NUMBER FOUR

RANGE SITE
ACRES

SPECIES: DECREASERS	P%	C%
INCREASERS		
INVADERS		
%Composition	100%	%
Cond. Class	XXX	

SITE NUMBER FIVE

RANGE SITE
ACRES

SPECIES: DECREASERS	P%	C%
INCREASERS		
INVADERS		
%Composition	100%	%
Cond. Class	XXX	

SITE NUMBER SIX

RANGE SITE
ACRES

SPECIES: DECREASERS	P%	C%
INCREASERS		
INVADERS		
%Composition	100%	%
Cond. Class	XXX	

PRESENT RATING

SITE	ACRES	AUM'S/AC	TOTAL AUM'S
No.1	538.4	0.243	131.0
No.2	101.6	0.126	13
No.3			
No.4			
No.5			
No.6			

TOTAL ACRES 640 **TOTAL AUM'S** 144

POTENTIAL

SITE	ACRES	AUM'S/AC	TOTAL AUM'S
No. 1	538.4	0.3	
No. 2	101.6	0.3	
No. 3			
No. 4			
No. 5			
No. 6			

TOTAL ACRES **TOTAL AUM'S**

Date: 5-13-98

Lease No.: 6732 County: PHILLIPS Sec.: 16 Twp.: 26.0N Rge: 28.0E

Antelope
① Remove wood
② Remove old fence

Site Abbr. Species	PS	DC 101.6				
Agsm 2	23	23				
Stvi	4	10				
Camo	T					
Stoo 1	25	10				
Sagr 3	15	20				
Kogy 5	6	3				
Pose 4	14	20				
Mecal	6	3				
Bite	T	2				
Popr		1				
Arlo	T					
Sihy		T				
Besy		T				
Arsp	1	1				
Arca	T	1				
Chna	1	1				
FORB	3	3				
INV.	2	2				
NOXIOUS						

Site Description and Comments:

PS- Site is the majority Acres of trat. Site looks good. Utilization was 30-45% last year. This year no grazing. Only negative is a severe SDS problem from past management.

DC- disadvantage. Not a loc of production

WD Management Prob.

Dog Town Leavestaking 30 Acres

Forbs:

Inc.:

Spsp, Allium, Comat, Arlu, P. smoke, Astragulus, Oxytrop., Antenaria, Winterfat, Alium, PHHO, Ponsomen, Thrh Amlie

Inv.:

PLPa, YaSa, Cecy, Taof, Tride

WATER _____

_____

_____

_____

_____

Additional Comments: _____

_____

_____

_____

_____

_____

_____

RECORD GENERAL OBSERVATIONS

1. Rainfall during the current year:

   _____ Way below average
   _____ Slightly below average
   _____ Average
   _____ Slightly above average
   _____ Way above average

2. Describe growing season conditions:

   _____ Above average
   _____ Average
   _____ Below average

3. Describe any unusual ecological events (i.e., insects, fire, hail, etc.)

_____

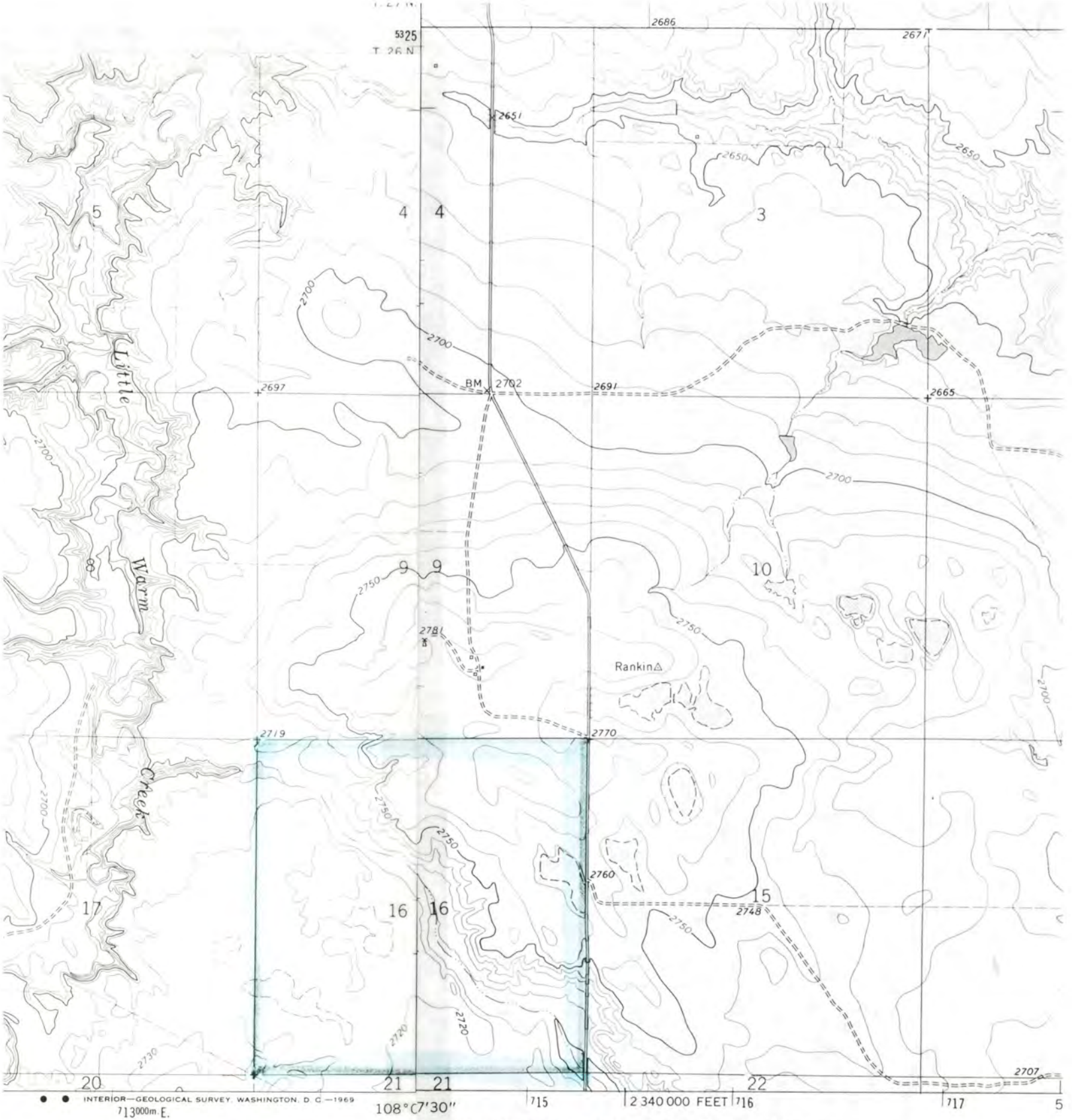
_____

4. Other comments: _____

_____

_____


A9
A9
Dog Town
16
CP
CP
Blanco Canyon



INTERIOR—GEOLOGICAL SURVEY, WASHINGTON, D. C.—1969

ROAD CLASSIFICATION

Medium-duty — Light-duty

Unimproved dirt

U. S. Route

Mapped, edited, and published by the Geological Survey
as part of the Department of the Interior program
for the development of the Missouri River Basin

Control by USGS and USC&GS

Topography by photogrammetric methods from aerial photographs taken 1965. Field checked 1965

Polyconic projection. 1927 North American datum
10,000-foot grid based on Montana coordinate system, north zone
1,000-meter Universal Transverse Mercator grid ticks, zone 12, shown in blue

Fine red dashed lines indicate selected fence lines



UTM GRID AND 1965 MAGNETIC NORTH DECLINATION AT CENTER OF SHEET

PHILLIPS, MONT.

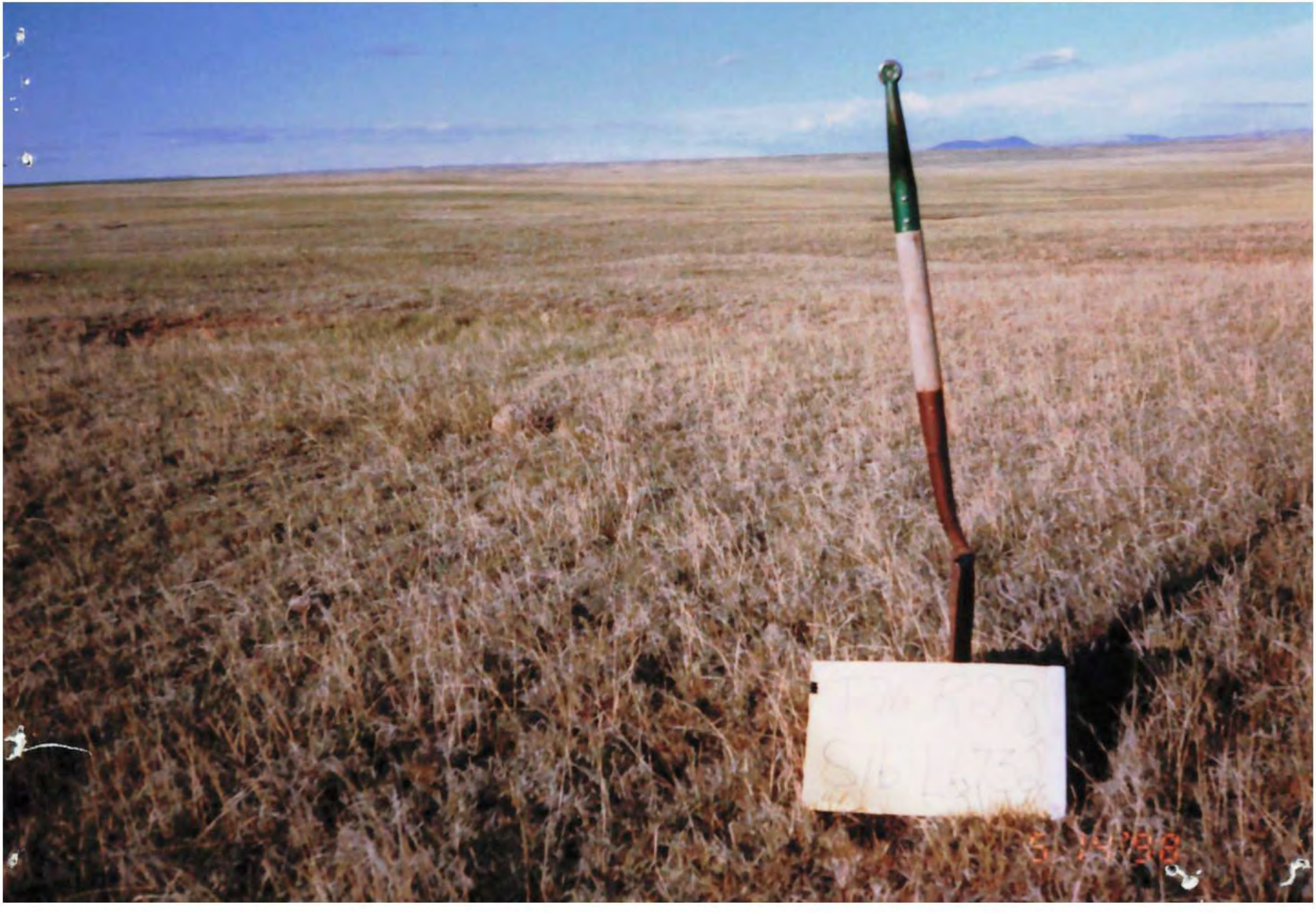
N4800—W10807.5/7.5

1965

FOR SA

L-6732

16-26-78


5/14/98

SALINITY PROBLEMS/EXISTING OR POTENTIAL: LAND USE _____ LOCATION _____

SURROUNDING LAND USE: Ag & Graz ACRES_____

CONTROL METHODS:

NOXIOUS WEEDS: None observed

LOCATION:

CONTROL:

UNTILLED & SUITABLE FOR AGRICULTURE: ACRES _____ LOCATION _____

EROSION PROBLEMS: None

RIPARIAN AREA HEALTH: N/A

UTILIZATION:	UNUSED	SLIGHT	MODERATE	FULL	CLOSE	SEVERE	EXTREME
	0%	0-20%	20-40%	40-50%	50-60%	60-80%	80-100%

TREND: UPWARD _____ DOWNWARD _____ STATIC _____

MANAGEMENT NEEDS ON ANY PART, OR USE, OF THIS TRACT

PS - Site is the majority acres of tract. Site looks good. ut.lization was 30-45% last year. This year no grazing to date. The only negative for the tract is that SEDE is effecting production. SEDE probably indicates the severe historic graging.

GEOGRAPHIC AREA (SCS DESIGNATION): E.S.P. W.S.P. (E.G.P.) W.G.P. F&M

PPT. ZONE: 0-9" ☐ 10-14" ☒ 15-19" ☐ 20-+" ☐

RECREATION OR POTENTIAL: Hunting

WILDLIFE OBSERVATIONS:

ACCESS: COUNTY ☒ HIGHWAY ☐ PRIVATE ☐ FEDERAL ☐ STATE ☐ LEGAL ACCESS: YES ☒ NO ☐

CONDITION OF ROAD: County maintained gravel Road

DISTANCE TO NEAREST LEGAL ACCESS: immediate

WATER COMMENTS:

LIVESTOCK WATER AVAILABLE

PERENNIAL NW NW NE - Breached in 98 INTERMITTENT

RESERVOIR(S) PIT(S)

SPRINGS: DEVELOPED WELL(S)

SPRINGS: NOT DEVELOPED

STOCKWATER TANK(S)

IRRIGATION WATER AVAILABLE

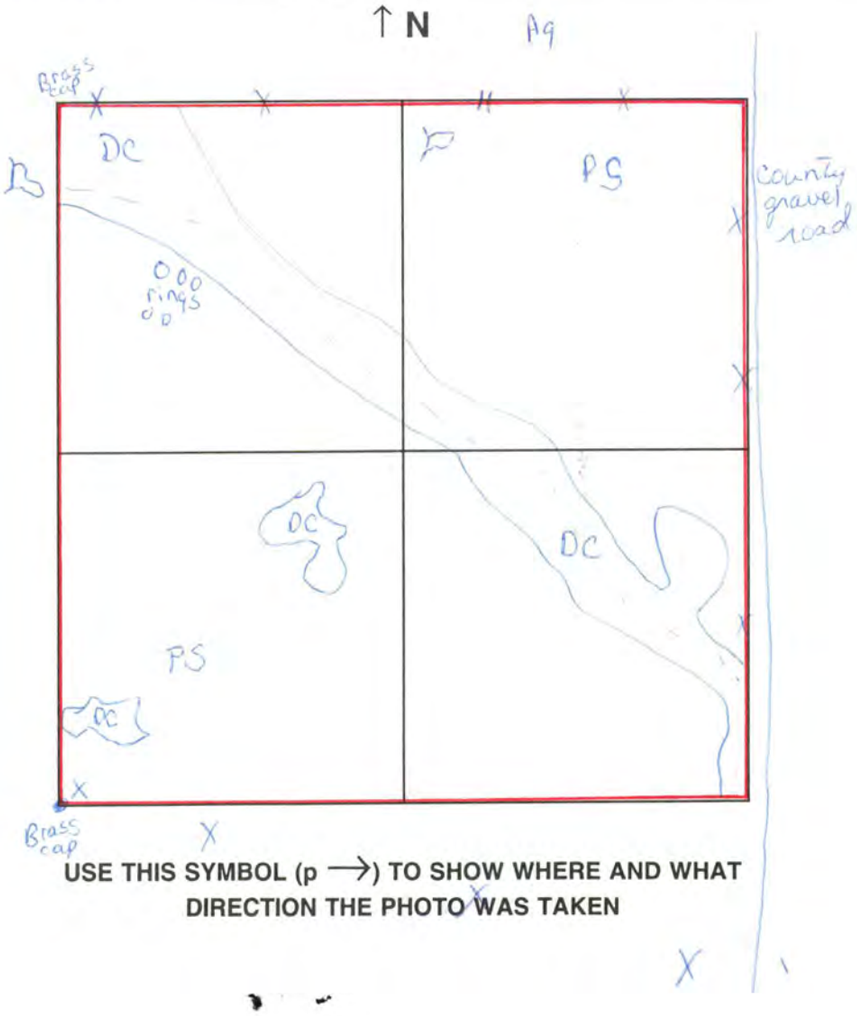
DIVERSION POINT ON OR OFF STATE LOCATION:

None

SOURCE NAME

HISTORIC SITES: Scattered Teepee Rings

IMPROVEMENTS:



USE THIS SYMBOL (p ⟶) TO SHOW WHERE AND WHAT DIRECTION THE PHOTO WAS TAKEN

MONTANA DEPARTMENT OF STATE LANDS
FIELD EVALUATION FORM

COUNTY Phillips SEC. 16 TWP. 26N RGE. 28E LEASE NO. 6732

STATE OWNED LAND IN SECTION

All

LESSEE Lloyd Knudsen

ADDRESS Malta, MT 59538

PHONE NO.

LEASE EXPIRES 2/28/89

PHOTO NUMBER

ASCS _____

DSL 478 61B

DESCRIPTION THIS LEASE

All

SUB-LESSEE

ADDRESS

PHONE NO.

CLASSIFICATION LAND USES:

CLASS I GRAZE 640 AC

CLASS II TIMBER _____ AC

CLASS III AGRI _____ AC

CLASS IV OTHER _____ AC

FIELD FINDINGS CURRENT USE	ACRES	
✓ GRAZING	640	USE Cattle
CONSERVATION RESERVE PROGRAM AND/OR OTHER		USE
DRYLAND AGRICULTURE		TYPE OF CROP(S)
IRRIGATED		TYPE OF CROP(S)
SEEDED DRY PASTURE OF HAY		SPECIES
TIMBERED ACRES		SPECIES LOCATION
✓ WASTE/UNSUITABLE ACRES		EXPLANATION

AU FORMER 15 AU REVISED 12.5

AUM FORMER 180 AUM REVISED 151

DEVELOPMENTS NOTED: POWERLINE _____ ROAD _____ PIPELINE _____ MISSILE CABLE _____ OTHER _____

N/A

MINERAL ACTIVITY: N/A

PRESENT SPECIAL LEASE:

FIELDMAN'S & AREA OFFICE RECOMMENDATION ON LAND USES:

Graze only AUM's assigned past use has been too much. Control Prairie Dogs.

SALINITY PROBLEMS/EXISTING OR POTENTIAL:

LAND USE: _____ LOCATION _____

N/A

CONTROL METHODS:

SURROUNDING LAND USE: Range

EROSION PROBLEMS: Some pedicelled plants due to overgrazing + runoff.

NOXIOUS WEEDS: _____ ACRES _____

CONTROL: None found

UNTILLED & SUITABLE FOR AGRICULTURE:

ACRES: Zero LOCATION _____

RECREATION OR POTENTIAL:

Hunt prairie dogs, waterfowl, deer

HISTORIC SITES: Teepee rings, I had a hard time picking them out but think it is a teepee ring site - just south of reservoir + west of drainage.

UTILIZATION Current use is 0% Past use has been close +.

USE LEVEL — DESCRIPTION

UNUSED	SLIGHT	MODERATE	FULL	CLOSE	SEVERE	EXTREME
0%	0-20%	20-40%	40-50%	50-60%	60-80%	80-100%

TREND

Upward _____ Downward ✓ Static _____

MANAGEMENT NEEDS ON ANY PART, OR USE, OF THIS TRACT

Use only AUM's assigned to this lease then pull out.

MANAGEMENT PLAN NEEDED: ✓ YES ___ NO

TYPE OF PLAN NEEDED: Plan to move cows when assigned AUMs have been used

FOLLOWUP:

✓ NEEDED

___ COMPLETED, 5/20/88 DATE, _____ NAME

WHO WAS CONTACTED? Lessee, PHONE ___, LETTER ✓, PERSONAL ___

LAND USE SPECIALIST: Robert Putzker DATE: 5/10/88

Photo #: 478 61B : _____ Field Notes: _____ 5/10/84 Date

County: Phillips Co. AC's: 640 Graz. Lease #: 6732

Lessee: Lloyd Knudsen
Malta, Mt. 59538

Site Abbr. Species	OV (or on bottom)	CP upland
Artri	30	
Stivi		T
Agsm	15	38
Bogr	25	10
Artri	10	15
Sedo	35%	45%
Stco	10	28
Oppo	10	2
Koco		5
Forbs		10
Posa		2
Y		
X		

Legal: All Sec. 16 T26N R28E

Precip. Zone: 10-14 EGP

Site Description and Comments:

Clay Pan or DC - site is along it currently produces very little forage (unsuitable) Drainage bottom that runs diagonally thru section Nearer reservoir + Dog town it supports a sparse stand of Agsm - Bogr - that is reduced due to runoff + cattle concentrati

The upper end of drainage grades into PS range site Very low forage production

CP - against road - low forage production hig sedo, lotsa cow pies - downfound.

This is almost a prairie pothole area Fridays 2-3 inch rain filled them + reservoirs -

Forbs

Inc: Grin squ

Inv: Tar oft

% Utilization	Pasture close Current 0%
Trend	down
Vigor	Fair - poor
Litter	Poor
Erosion	some pedicled on bottom
Reproduction	low
Growth Form	not vigorous
Capping	Scale
Weeds	No
Salinity	No
Topo	rolling gently w/clay pan + prairie potholes
General Soils	loam over dense clay
Kind of Road	Co gravel

Site	Acreage	% Climax

Stocking Rate	AUMS Present	AUMS Revised

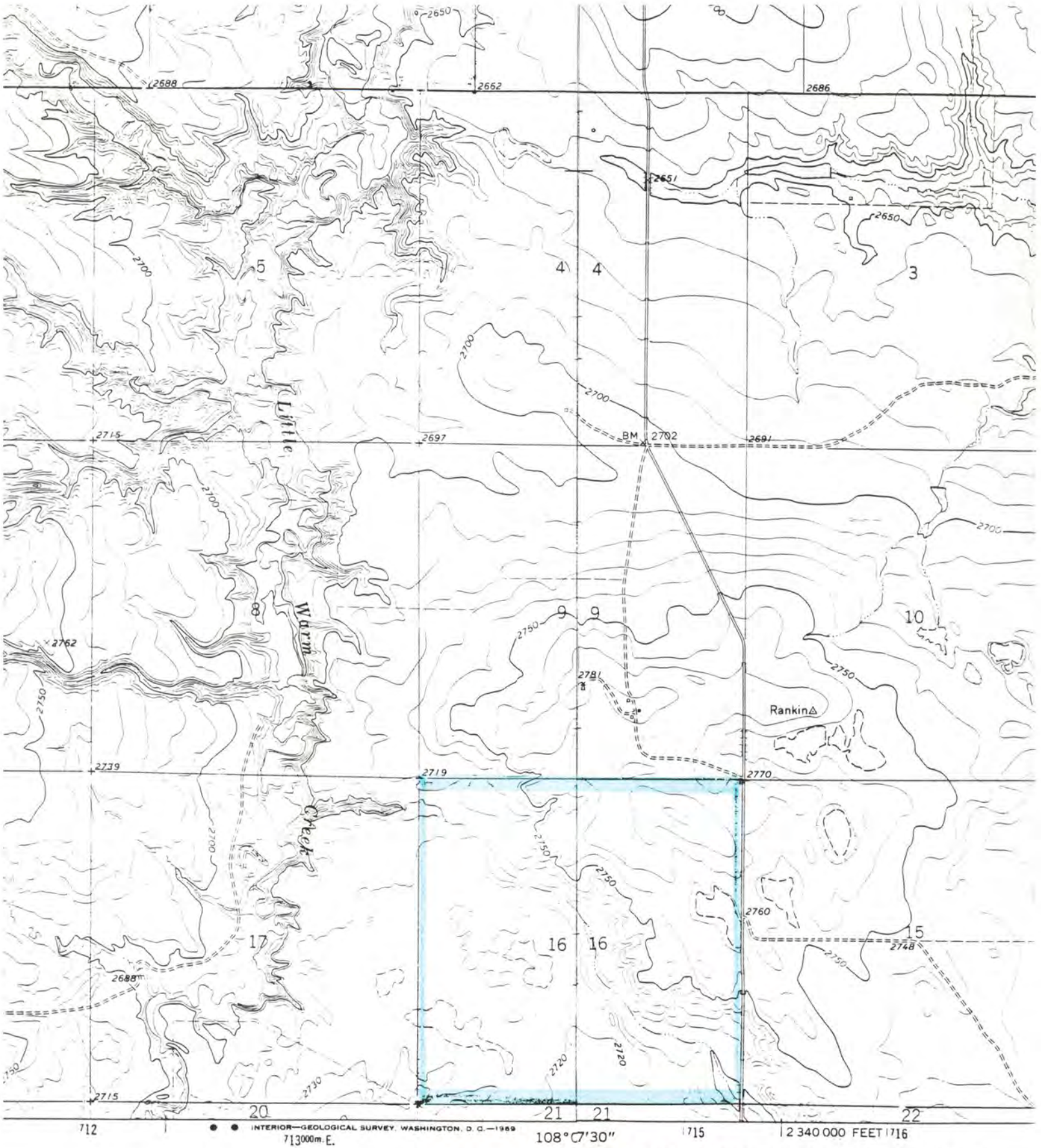
Animal Units Per Section

Present	Revised	Potential

Access: Co. [X] Hiway [ ] Private [ ]

Water: 2 reservoirs pot holes now full

Additional Comments: Use only assigned AUMs



INTERIOR—GEOLOGICAL SURVEY, WASHINGTON, D. C.—1969

ROAD CLASSIFICATION

Medium-duty ——— Light-duty ———

Unimproved dirt =======

U. S. Route

MONTANA

QUADRANGLE LOCATION

Mapped, edited, and published by the Geological Survey as part of the Department of the Interior program for the development of the Missouri River Basin

Control by USGS and USC&GS

Topography by photogrammetric methods from aerial photographs taken 1965. Field checked 1965

Polyconic projection. 1927 North American datum
10,000-foot grid based on Montana coordinate system, north zone
1000-meter Universal Transverse Mercator grid ticks, zone 12, shown in blue

UTM GRID A
DECLINATI

PHILLIPS, MONT.

N4800—W10807.5/7.5

All
16-26-28
#6732

RANGE EVALUATION

P% = PRESENT; C% = CLIMAX; COMPOSITION % BY WEIGHT
(May be clipped or estimated)

SITE NUMBER ONE			SITE NUMBER TWO			SITE NUMBER THREE		
RANGE SITE OV - (PS)			RANGE SITE CP			RANGE SITE		
ACRES 85			ACRES 555			ACRES		
SPECIES: DECREASERS	P%	C%	SPECIES: DECREASERS	P%	C%	SPECIES: DECREASERS	P%	C%
Agsm	15	15	Stvi:	T	T			
			Agsm	38	38			
INCREASERS			INCREASERS			INCREASERS		
Bogr	25	10	Bogr	10	5			
Art fri	10		Stco	28	20			
Stco	10	10	Kocr	5	5			
Oppo	10		FORBS	10	5			
			Posa	2	2			
Art tri (var arbuscula?)	30	5	Art fri	5				
			Oppo	2				
Sede (cover)	35%+							
INVADERS			INVADERS			INVADERS		
%Composition	100%	40 %		100%	75 %		100%	%
Cond. Class	XXX	FC		XXX	GC		XXX	

SITE NUMBER FOUR			SITE NUMBER FIVE			SITE NUMBER SIX		
RANGE SITE			RANGE SITE			RANGE SITE		
ACRES			ACRES			ACRES		
SPECIES: DECREASERS	P%	C%	SPECIES: DECREASERS	P%	C%	SPECIES: DECREASERS	P%	C%
INCREASERS			INCREASERS			INCREASERS		
INVADERS			INVADERS			INVADERS		
%Composition	100%	%		100%	%		100%	%
Cond. Class	XXX			XXX			XXX	

PRESENT RATING

SITE	ACRES	AUM'S/AC	TOTAL AUM'S
No.1	85	.08	7
No.2	555	.26	144
No.3			
No.4			
No.5			
No.6			

TOTAL ACRES 640 TOTAL AUM'S 151

POTENTIAL

SITE	ACRES	AUM'S/AC	TOTAL AUM'S
No. 1	85	.2	17
No. 2	555	.35	194
No. 3			
No. 4			
No. 5			
No. 6			

TOTAL ACRES 640 TOTAL AUM'S 211

AU'S PER SECTION: PRESENT 15 REVISED 12.5 POTENTIAL 17

PHYSICAL & GEOGRAPHIC INFORMATION

GENERAL TOPOGRAPHY prairie pothole or pan spot gently rolling

PPT. ZONE
0-9 "
10-14"
15-19"
20- + "

GEOGRAPHIC AREA (SCS DESIGNATION): E.S.P. W.S.P. E.G.P. W.G.P. F&M

ACCESS: COUNTY HIGHWAY PRIVATE STATE LEGAL

CONDITION OF ROAD: good gravel **DISTANCE TO NEAREST LEGAL ACCESS** Immediate

WATER:

LIVESTOCK WATER AVAILABLE

PERENNIAL NAME _____ INTERMITTENT NAME _____ USE ____

RESERVOIR(S) 2 Sac SIZE/PROBABLE USE stock HeD WELL(S) _____ PROBABLE USE _____

SPRINGS: DEVELOPED _____ USE _____

SPRINGS: NOT DEVELOPED _____ USE _____

STOCKWATER TANK(S) _____ USE _____

IRRIGATED WATER AVAILABLE

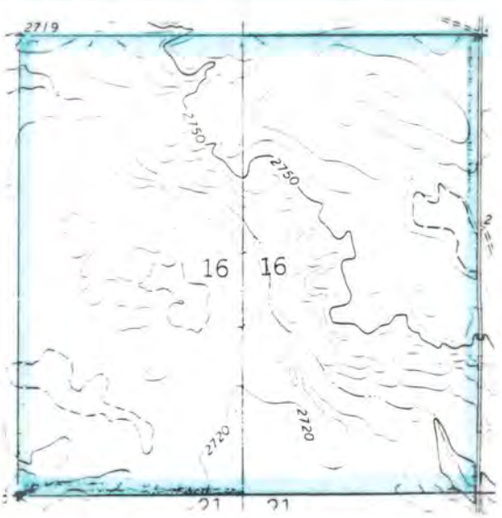
DIVERSION POINT ON OR OFF TRACT

SOURCE NAME _____

WATER COMMENTS: Currently with heavy rain 3 days ago water standing everywhere.

IMPROVEMENTS: 2 miles fence N + E sides are fenced
4 + 3 wire w/wood 1 mile each.
1 small reservoir





USE THIS SYMBOL (p ⟶) TO SHOW WHERE AND WHAT DIRECTION THE PHOTO WAS TAKEN

MONTANA DEPARTMENT OF STATE LANDS
FIELD EVALUATION FORM

COUNTY PHILLIPS | SEC. 16 | TWP. 26N. RGE. 28E. | LEASE NO. 6732

STATE OWNED LAND IN SECTION: All — 640 Acres

LESSEE: Lloyd Knudsen
ADDRESS: Malta, Montana 59538

EXPIRES: 2-28-79
PHONE: 658-3222
PHOTO NO.: 17-48

DESCRIPTION THIS LEASE: Same

SUB-LESSEE
ADDRESS
PHONE

CLASSIFICATION

LAND USES: GRAZ. 640 AC.; AGRI. ____AC.; OTHER ____AC.; OTHER ____AC.

FIELD FINDINGS: GRAZ. 640 AC.; AGRI. ____AC.; OTHER ____AC.; OTHER ____AC.

CLASS I AC. CLASS ____AC. CLASS ____AC.

REVISED LAND USES: GRAZING 640 AC. AGRICULTURE ____AC. OTHER ____AC. ____AC.

A.U. FORMER 15 A.U. REVISED 15

PRESENT SPECIAL LEASE:

—

FIELDMAN'S RECOMMENDED LEASE

Lease remain as is.

ADMINISTRATOR'S NOTES AND INSTRUCTIONS:

SUGGESTED POSSIBLE LAND USES: —

FIELDMAN'S POSSIBLE USES: —

FIELDMAN'S RECOMMENDATIONS ON LAND USES

Lease remain as Grazing lease.

ADJACENT LAND USE AND POTENTIAL

North-Grazing & Agri South-Grazing East-Grazing West-Grazing

RECREATION INVENTORY

NO	YES	RATING
✓		

SHOULD THERE BE AN INVENTORY?

NO	YES
✓	

RESOURCE DEVELOPMENT POTENTIAL

TYPE —

LESSEE COMMENTS —

X

ACTUAL LAND USES: ACRES

GRAZING.....	640	USE Summer Pasture
CONVERTED CROPLAND.....		USE —
DRYLAND AGRICULTURE.....		USE —
IRRIGATED.....		TYPE OF CROP OR CROPS —
SEEDED DRY PASTURE OF HAY..		EXPLANATION —
TIMBERED ACRES.....		SPECIES —
		LOCATION —

WASTE OR UNUSED ACRES — EXPLANATION —

LESSEE COMMENTS

FEEDLOT: SIZE, ETC.,
PROBLEMS

MINERAL ACTIVITY

TYPE PROBLEMS

SCENIC VALUE: EXPLANATION

SALINITY PROBLEMS

LAND USE LOCATION

CONTROL METHODS

SURROUNDING LAND USE

NOXIOUS WEEDS CONTROL

EROSION PROBLEMS

LESSEE COMMENTS

UNTILLED & SUITABLE FOR AGRICULTURE

None ACRES: LOCATION

RECREATION OR POTENTIAL

HISTORIC SITES

WATER NEEDS

WATER

PERENNIAL STREAM: NAME USE —
INTERMITTENT STREAM, NAME USE —
WELLS, NUMBER USE — USE — USE —
SPRING NUMBER USE —
RESERVOIRS & PITS 1 Dam TYPE, SIZE & USE 25' width 30' length Stock water

DIVERSION POINT & SOURCE OF IRRIGATION WATER —

DATE OF FIRST USE - IRRIGATION, WELLS, RESERVOIRS, STREAMS, OR OTHER —

COMMENTS No known date when built, No known water rights filed.

RANGE EVALUATION (P% = PRESENT C% = CLIMAX)

SITE NUMBER ONE			SITE NUMBER TWO			SITE NUMBER THREE		
TYPE clayey			TYPE			TYPE		
ACRES 640			ACRES			ACRES		
SOILS clay loams			SOILS			SOILS		
GRASSES:	P%	C%	GRASSES:	P%	C%	GRASSES:	P%	C%
Western Wheat	15	15						
Needle & Thread	10							
Blue Gramma	15	5						
Green Needle	15	15						
Prairie Coneflower	15	15						
Fringe Sagewort	5							
FORBES Forbes	5	5	FORBES			FORBES		
SHRUBS Cactus	5		SHRUBS			SHRUBS		
Club Moss	10							
Sagebrush	5							
	100	55						

SITE	ACRES	CONDITION	AUMS/ac	TOTAL AUMS	INCREASE OR DECREASE	REASON	REVISED AUMS	POTENTIAL AUMS/as	POTENTIAL CONDITION	POTENTIAL TOTAL AUMS
No. 1	640	GC	.262	168	12	water	180	.262	GC	180
No. 2										
No. 3										
TOTAL ACRES	640			168 AUMS			180 AUMS			180 AUMS

ANIMAL UNITS PER SECTION.....ACTUAL 14 REVISED 15 POTENTIAL 15

RANGE NEEDS:

IS IT OVERGRAZED —

DOES IT NEED RENOVATION —

IS THE LESSEE INTERESTED IN RENOVATION —

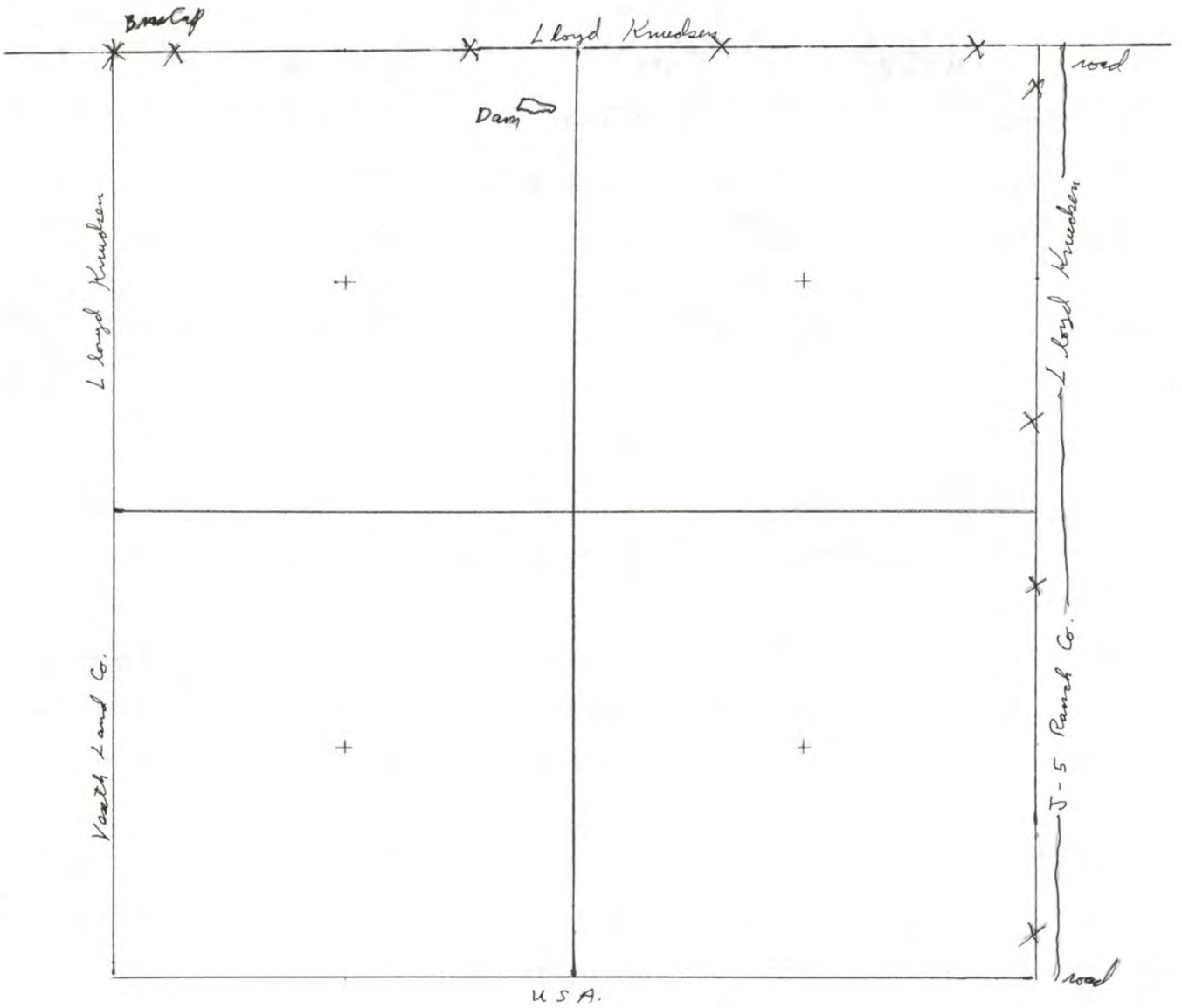
IMMEDIATE MANAGEMENT NEEDS ON ANY PART, OR USE, OF THIS TRACT

—

WHO WAS CONTACTED Lloyd Knudsen

[ ] Telephone [ ] Letter [X] Personal

FIELDMAN Randy Dickson DATE June 14-1977



ACCESS: COUNTY [X]: HIGHWAY [ ]: PRIVATE [ ]: LEGAL [ ] Yes [X] No

CONDITION OF ROAD Good

DISTANCE TO NEAREST LEGAL ACCESS 6½ miles to Highway

PHYSICAL & GEOGRAPHIC INFORMATION

GENERAL TOPOGRAPHY Hilly PPT. ZONE 10-14

GENERAL SOILS Clay loams

IMPROVEMENTS

TYPE	$ VALUE	OWNER
2 miles fence, 3 & 4 wires, wood & steel posts	$800	Lessee
1 Dam	$200	Lessee

REMARKS

artcraft printers

RANGE CONDITION WRITE UP SHEET

County Phillips
Lease No. 44547
Lessee Lloyd Knudson
Address Malta, Mont

Sheet No. 1 Aerial Photo No. 12cv-48
Location: T. 26 R. 28 S. 16
Survey Date 10-17-68 By B Hayes
State Owned: 640
Agri. _____ Graze 640 Other _____

Plant Groups	Plant Names	% Present	% Climax
Grass	NT	40	40
Grass-	June	10	05
like	BG	20	15
Plants	Sedge	10	05
%		80	65
Forbs			
%			
Shrubs or Trees			
%			
100%	Totals		

Present Range Condition High good to Ex

Animal Unit Months/Acre 2.9

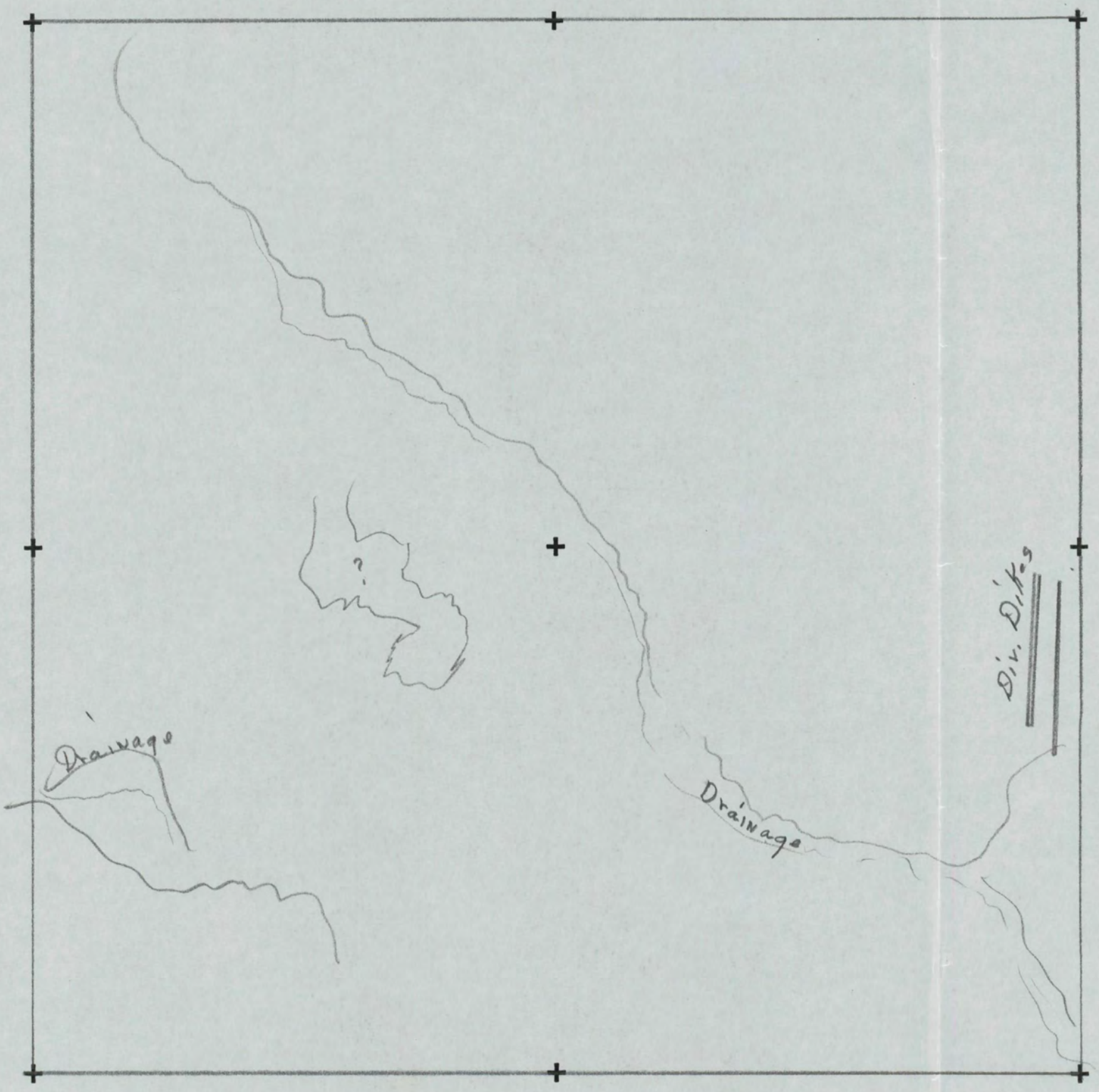
INVENTORY DATA

Topography ~~Hilly~~ Rolling
Soil Description Silty
PPT Zone 10-14
Range Site
Slope 2-8 %
CAP Class G-3
Water Availability Dam NE corner Sec 17
Present CC - Hd/Sec. 15
Potential CC - Hd/Sec. 15

GENERAL PRACTICES

Range
Agriculture None
Conservation None
Improvements & Value Fence 500.00
Timber None
Wildlife Influence None
Recreation None
Remarks

PHOTO NO. 17-49 PHOTO SOURCE @ SCS PHOTO DATE 8-16-59



SECTION All 16 TWP 26 N RANGE 28 E

COUNTY Phillips

3

APPRAISAL

NW¼	NE¼
Surface	Surface
Soil	Soil
Water	Water
SW¼	**SE¼**
Surface	Surface
Soil	Soil
Water	Water

Name of Inspector.....

Date of Inspection.....

Sec. 16 Twp. 26N Rge. 28E

Photo 17-48

State Owned Land: All

County Phillips Class Grazing

DESCRIPTION: All

Lease No: 44547 Date of Expiration: 2-28-69

Name & Address of Lessee: Lloyd Knudson; Malta, Mont.

1. Acreage-How Used: Agri: Grazing: 640 ac. Other:
2. Farm Code No: Wht. Allot. Feed Grain Base
3. Timber
4. If sub-leased give name and address:
5. Improvements and Value
   (Give ownership)
6. Is present operation satisfactory as to:
   1. Tillage practices. 2. Range Management. 3. Conservation. 4, Recreation
7. Appraisal: Agriculture: Grazing: 30 ~~00~~
8. Untilled land suitable for cultivation 160
9. Is land included in SCD farm & ranch management plan? ~~No~~ ~~one~~
10. Who was contacted on this lease: Hoyd Knudsen
11. Irrigability: None
12. Adjacent Landowners and Address:

CARRYING CAPACITY PER SECTION

Present 15 Revised 15 ✓ BLM Reclassification

head for 12 months

U.S. Department of Agriculture, Natural Resources Conservation Service. (2026, September 22). *Custom soil resource report for Phillips County Area, Montana: Lease 6732 26N 28E 16* [Soil survey report].

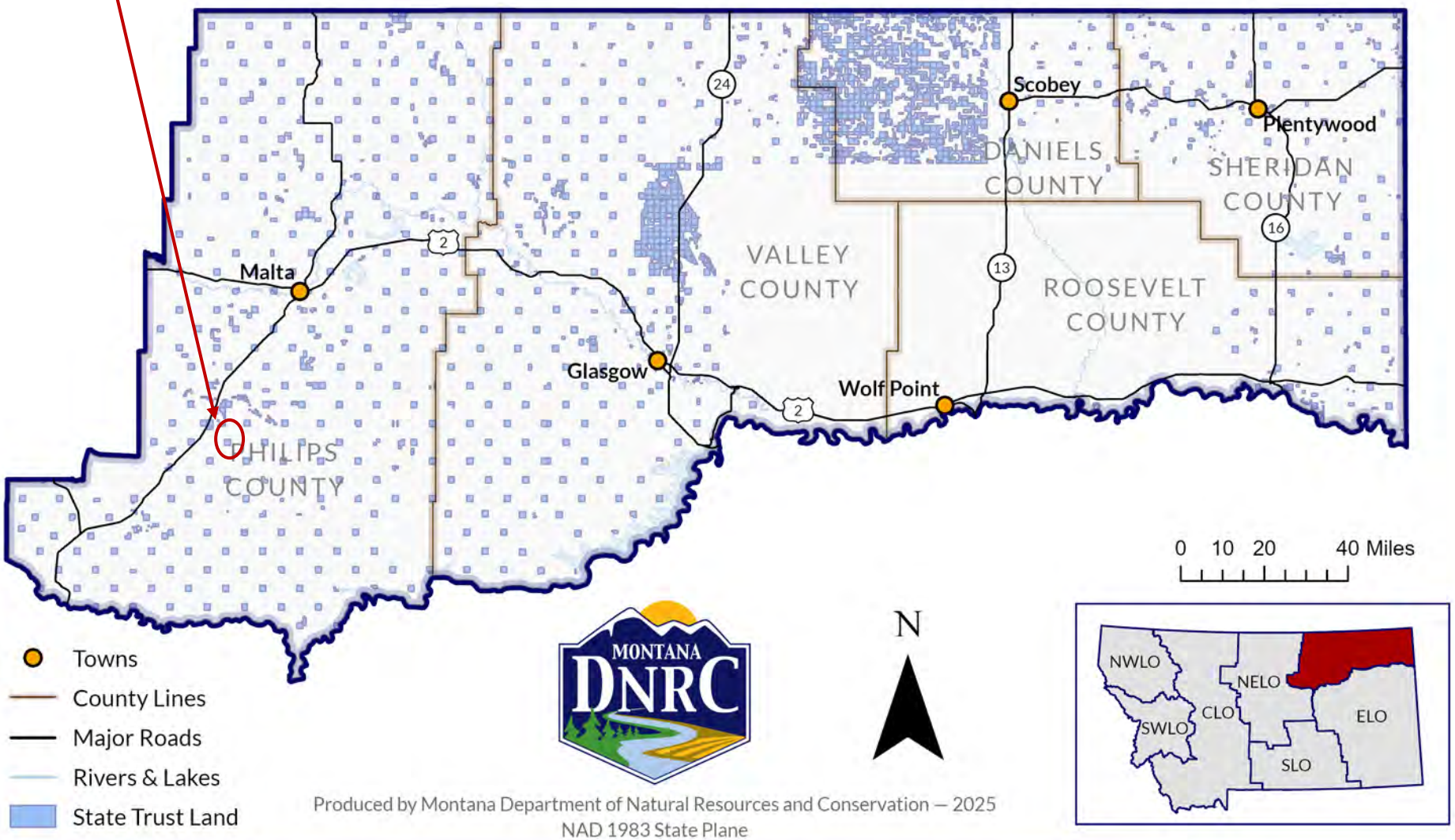
Montana Natural Heritage Program. (2026, July 27). *Environmental summary report for latitude 47.98627 to 48.02966 and longitude −108.09185 to −108.15876* [Environmental summary report].

State Trust Land Vicinity Map
Glasgow Unit

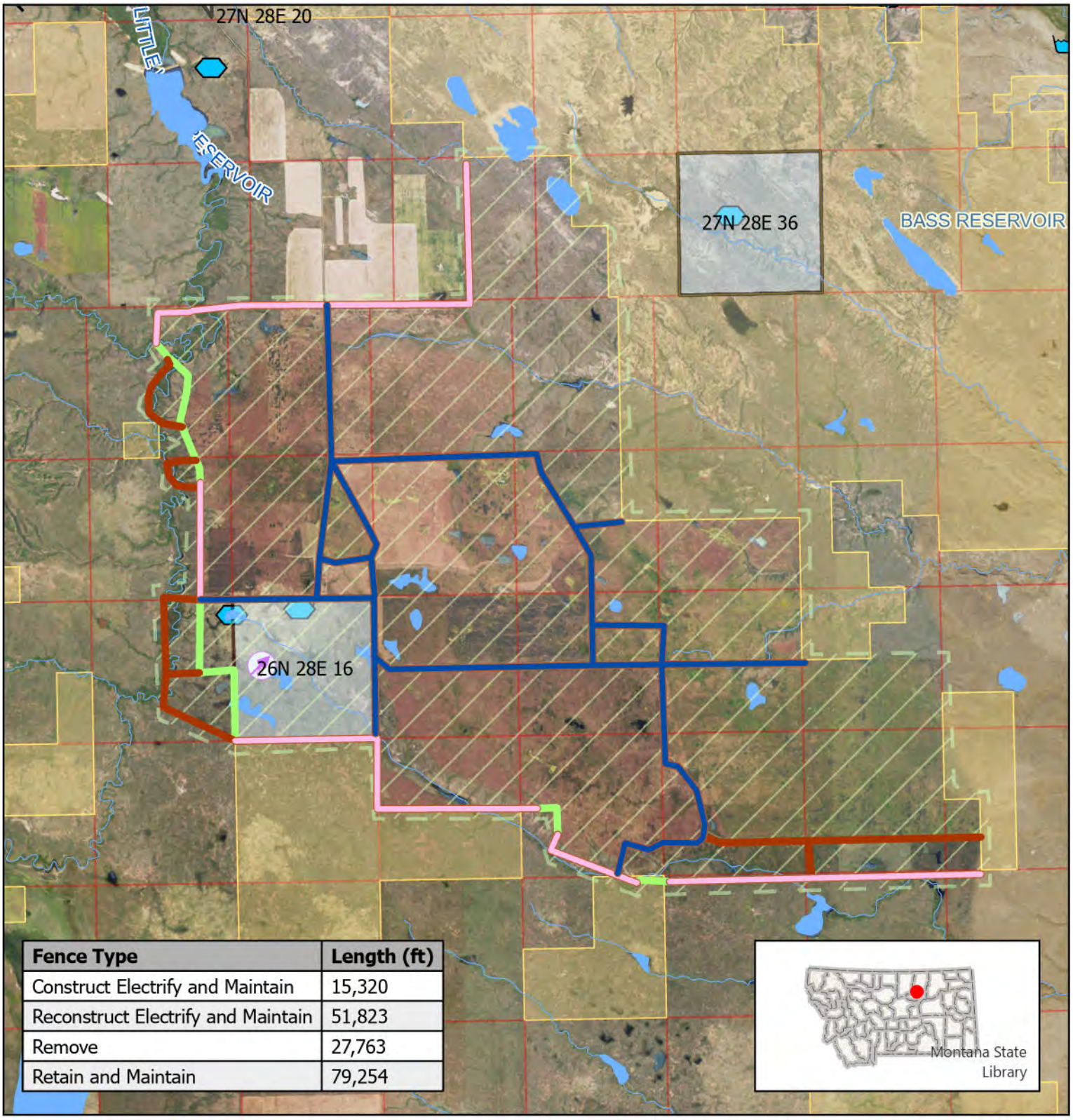
APR 2026 Bison Grazing Proposal
(Submitted on February 2, 2026)

State Lease #6732

County: Philips



Produced by Montana Department of Natural Resources and Conservation — 2025
NAD 1983 State Plane



Fence Type	Length (ft)
Construct Electrify and Maintain	15,320
Reconstruct Electrify and Maintain	51,823
Remove	27,763
Retain and Maintain	79,254

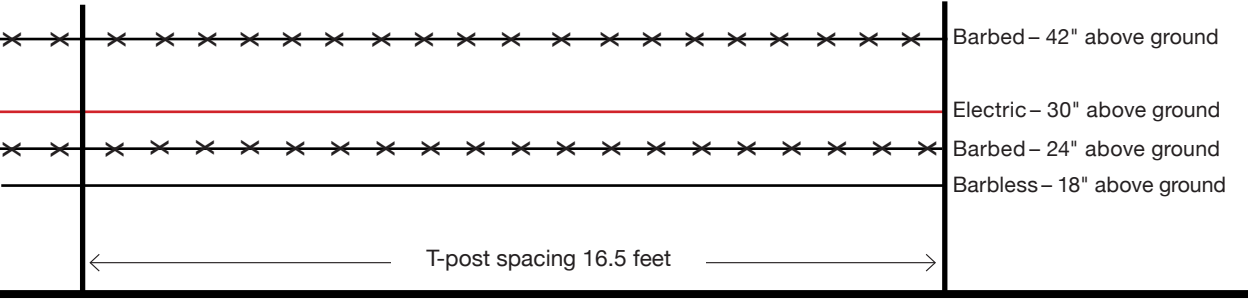
APF 2026 GRAZING PROPOSAL

APR Proposed Fence Plan
- Construct Electrify and Maintain
- Electrify and Maintain
- Remove
- Reconstruct Electrify and Maintain
- Retain and Maintain
- Interior Fence
- Stockwater Tank
- Reservoir
- Historic / Cultural Site
- Stockwater Pit
- DNRC State Trust Land
- Cumulative Effects Analysis Area
- Section Lines

N

0 0.5 1 2 Miles

Appendix F: Figures (fencing diagram)



Fence diagram

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