

#1

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Thursday, September 24, 2026 6:32:29 PM
Last Modified: Thursday, September 24, 2026 6:35:44 PM
Time Spent: 00:03:15
IP Address: 159.111.12.95

Page 1

Q1

Contact information

Name:	Gerald Martin
City/Town:	Bozeman
State/Province:	MT
Email Address:	adventurewestproductions@gmail.com

Q2

Please comment on Hannah Ranch Conservation Easement

I'm in full support with granting a permanent Conservation easement for the Hannah Ranch. I would prefer a permanent easement rather than a long term lease .

Q3

Respondent skipped this question

Optional: Upload your comments

#2

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Sunday, September 27, 2026 8:22:21 PM
Last Modified: Sunday, September 27, 2026 8:24:49 PM
Time Spent: 00:02:28
IP Address: 173.40.205.115

Page 1

Q1

Contact information

Name:	Henry Hoffman
City/Town:	Missoula
State/Province:	MT
Email Address:	henryhoffman07@gmail.com

Q2

Please comment on Hannah Ranch Conservation Easement

I wholeheartedly support FWP's forward-looking acquisition of the Hannah Ranch Property.

Q3

Respondent skipped this question

Optional: Upload your comments

#3

COMPLETE

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Last Modified: Monday, September 28, 2026 3:34:08 PM
Time Spent: 00:24:34
IP Address: 65.131.197.139

Page 1

Q1

Contact information

Name:	Larry Rattray
City/Town:	Proctor
State/Province:	MT
Email Address:	rattpak@centurytel.net

Q2

Please comment on Hannah Ranch Conservation Easement

I may be missing the big picture but I don't like this one. Number 1, I don't like spending 3+ Million Dollars and then it is gone later. I won't be here to see what is next after 99 years but I like permanent transactions for my money.

Number 2 is this land is only used by elk in the spring and winter. There is no cover to hold them when there is an active hunting season. I didn't see what access is there for hunters.

The landowners are getting a large chunk of money and Montana's hunters are not getting anything permanent beyond a half mile walkway to National Forest which is a good thing but not 3+ Million dollars worth.

Q3

Respondent skipped this question

Optional: Upload your comments

#4

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Collector: Web Link 1 (Web Link)
Started: Monday, September 28, 2026 3:29:36 PM
Last Modified: Monday, September 28, 2026 3:36:56 PM
Time Spent: 00:07:19
IP Address: 174.201.19.76

Page 1

Q1

Contact information

Name:	Vince Colucci
City/Town:	Anaconda
State/Province:	MT
Email Address:	vince olucci@msn.com

Q2

Please comment on Hannah Ranch Conservation Easement

Agree w this purchase as it is proposed. Would suggest limiting motorized vehicle traffic and OHV traffic

Q3

Respondent skipped this question

Optional: Upload your comments

#5

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Monday, September 28, 2026 3:48:21 PM
Last Modified: Monday, September 28, 2026 3:58:44 PM
Time Spent: 00:10:23
IP Address: 98.127.112.31

Page 1

Q1

Contact information

Name:	Jonathan Ball
City/Town:	Billings
State/Province:	MT
Email Address:	jonathan.ball@ymail.com

Q2

Please comment on Hannah Ranch Conservation Easement

I am extremely excited about the Hanna Ranch acquisition. However, the change to a 99 year lease is short sighted. Please reconsider acquiring access as a lease and instead secure the access in perpetuity. They won't be making more land in 99 years and preserving this in perpetuity is the right thing to do.

Q3**Respondent skipped this question**

Optional: Upload your comments

#6

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Time Spent: 00:03:29
IP Address: 76.75.36.48

Page 1

Q1

Contact information

Name:	Mark Savinski
City/Town:	Sheridan
State/Province:	MT
Email Address:	marksavinski@gmail.com

Q2

Please comment on Hannah Ranch Conservation Easement

I fully support the Hannah Ranch Conservation Easement for 99 years. Any type of activity similar to this that will open up more public access opportunities for the average Montanan and other recreators is a positive thing. I fully support this project.

Q3

Respondent skipped this question

Optional: Upload your comments

#7

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Last Modified: Monday, September 28, 2026 4:35:02 PM
Time Spent: 00:04:43
IP Address: 174.45.102.25

Page 1

Q1

Contact information

Name: Mike McGrath
City/Town: Helena
State/Province: MT

Q2

Please comment on Hannah Ranch Conservation Easement

Please support. Great Elk country.

Q3

Respondent skipped this question

Optional: Upload your comments

#8

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Tuesday, September 29, 2026 6:53:28 AM
Last Modified: Tuesday, September 29, 2026 6:58:50 AM
Time Spent: 00:05:21
IP Address: 98.127.101.53

Page 1

Q1

Contact information

Name:	Tim E Doughty
City/Town:	Great Falls
State/Province:	MT
Email Address:	timedoughty@yahoo.com

Q2

Please comment on Hannah Ranch Conservation Easement

It would be very good if the "Walk in" rule would clarify and include equine. (Horses and Mules)

Q3

Respondent skipped this question

Optional: Upload your comments

#9

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Time Spent: 00:17:12
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Page 1

Q1

Contact information

Name:	Dean Blomquist
City/Town:	Ryegate
State/Province:	MT
Email Address:	deanblomquist@gmail.com

Q2

Please comment on Hannah Ranch Conservation Easement

I continue to be in favor of the proposed action. This action will provide needed additional access to public lands as well as provide help in managing elk numbers above desired population.

Q3

Respondent skipped this question

Optional: Upload your comments

#10

COMPLETE

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Last Modified: Tuesday, September 29, 2026 3:06:16 PM
Time Spent: 00:01:06
IP Address: 99.140.156.173

Page 1

Q1

Contact information

Name:	Kevin Farron
City/Town:	Missoula
State/Province:	MT
Email Address:	kevin@mtwf.org

Q2

Please comment on Hannah Ranch Conservation Easement

On behalf of the Montana Wildlife Federation (MWF), who for 90 years has worked to protect Montana's fish and wildlife, public lands, clean waters, and fair-chase hunting and fishing heritage, please accept these comments regarding the proposed 99-year Habitat Lease for the Hannah Ranch.

We are incredibly supportive of the project and deeply appreciative of the landowners, but we have serious concerns with the terms.

The proposal would conserve 3,652 acres of some of the best elk habitat in the state for a long, long time. Add to that the granted and perpetual walk-thru access to public lands, essentially creating a new trailhead to the NW corner of the Big Snowy Mountains, and this project is a win for the landscape, public access, hunting opportunity, and the working, production agriculture family who calls this ranch home. There's no question about that.

However, the 99-year term is incredibly problematic and would set a harmful precedent. The responses from FWP in the Decision Notice did little to satisfy these concerns, and in some ways made them worse.

First and most concerning, this isn't what the landowners want. Since 2021, the Gilberts have been clear that they prefer a perpetual easement, something FWP acknowledges themselves in page 17 of the Decision Notice. Forcing this as a 99-year agreement is not only disrespectful and harmful to small-scale agriculture, conservation efforts, and other public access opportunities in Montana, it's a clear violation of and threat to private property rights.

The public and locals prefer a perpetual agreement as well. At the July 21st information meeting in Lewistown, local stakeholders voiced overwhelming preference for a perpetual conservation easement, and expressed concerns over the false choice of the 99-year agreement or nothing.

Additionally, this project was already scoped as a perpetual agreement, something FWP acknowledges on page 12 of the Decision Notice. During that time, an April 14, 2025 letter of support for the perpetual proposal was received from the Fergus County Commissioners.

Most recently, of the 119 comments submitted during the Environmental Analysis, 86 expressed a strong and clear preference for this to be a perpetual conservation easement (72%). This compared to just 18% who supported the project as a 99-year agreement, 6% who opposed entirely, or 4% of comments that were neutral. It's also likely that the 18% who supported the project as a 99-year agreement would also support it as perpetual.

FWP claims there is 'some opposition' to the perpetual conservation easements, and they're not wrong - but it's important to put this 'some' in context by showing the vast majority who support this as a perpetual easement, including local stakeholders and the County Commission.

By ignoring other alternatives - i.e., perpetual - FWP is presenting us and the Commission with a false choice.

While FWP repeatedly claims that this 99-year agreement is the only viable option, the explanation is lacking. In the Decision Notice, FWP outlines four alternatives: 1) no action; 2) the proposed action: a 99-year agreement; 3) a 30- or 40-year Habitat Lease, which the landowners don't want; 4) or to pursue a perpetual CE.

Responding to the 4th option, FWP goes on to explain that "Conservation easements offered by FWP can be perpetual, meaning the protections offered would remain on the land in perpetuity. Due to some opposition to perpetual CEs, FWP determined Alternative 2 was a more viable option. Accordingly, FWP dismissed Alternative 4 and did not carry it forward in this analysis." That's it. The entirety of FWP's position is "due to some opposition to perpetual CEs." This is wholly unacceptable.

Perpetual CEs are legal options; there's funding available; it's what the landowners prefer, and it's a landowner's right. This is not FWP's call.

For FWP to not carry forward an alternative simply because there is "some opposition to perpetual CEs," FWP is boldly disrespecting

and abusing their agency discretion, directive and authority. At the very least, the Commission should be given the option to move this 4th Alternative forward, and approve a perpetual CE.

The next line of approval after FWP and the Commission is the Land Board. MWF understands and is sympathetic to the political concerns with one or two members of the Land Board and their personally held ideologies against long-term conservation efforts. However, these ideologies are not representative of Montanans, and this issue should not be Montana FWP's - or the Commission's - sword to fall on.

A loud, vocal minority opposing conservation is nothing new. A few lawmakers in Helena have repeatedly pushed these same unpopular attacks on private property rights - attacking perpetual easements in favor of short-term habitat leases. Yet, tellingly, these efforts have been routinely and roundly defeated.

Take Senate Bill 209 from State Senator Tony Tezak (R-Ennis) in 2025 which proposed limiting conservation easements to a term of 40 years max, rather than allowing perpetual agreements. The bill was so unpopular, and the outrage so overwhelming and swift, Sen. Tezak opened his bill's hearing waving a white flag and saying he was withdrawing the bill but still wanted to allow opponents a chance to express their concerns. After a long line of reasonable and diverse opposition, the bill was then defeated not just with bipartisan opposition, but tabled unanimously.

Yet by FWP forcing this 99-year habitat lease and with a valuation of 95% of the perpetual appraisal, Montana would face the same outcome as Sen. Tezak's bill - perpetual easements in Montana would effectively end. Because what landowner in the future would elect to sell perpetual development rights when they can collect 95% of that value by offering a 99-year lease instead? Moving forward with this 99-year term and caving to perceived and personal ideologies of the Land Board would set an anti-private-property-rights precedent.

In the Decision Notice: "FWP also recognized that a 99-year term CE is a new model but reiterated that FWP remains committed to pursuing perpetual CEs in the future." How is the public supposed to believe this when there's no reason now to not pursue the perpetual CE easement other than "some opposition"? If 'some opposition' is all it takes to shelf the idea now, FWP certainly isn't showing a commitment to pursuing perpetual CEs now or in the future.

For FWP to make a decision based on an assumption that this won't be approved by the Land Board as a perpetual easement is presumptuous, inappropriate and offensive to the Montanans who elected the 5-member Land Board to represent us.

Finally, while there's money available with the Habitat Montana account sitting at more than \$30 million, and MWF would be delighted to see this money spent, this isn't a responsible use of sportsmen's funds. The proposed purchase price of the 99-year agreement is 95% of the appraised value of a perpetual easement. So for a 5% 'savings,' the proposed alternative is electing to conserve lands and offer public access for 99 years versus forever.

But don't take our word for it.

Here's what FWP had to say in the Decision Notice about the valuation and comparison between perpetual and 99-years: "FWP agrees that a perpetual CE would provide a more long- term public benefit," and "FWP acknowledges concerns regarding valuation of a 99-year CE relative to a perpetual CE, and the uncertainty of future costs to renew or otherwise protect the Hannah Ranch's Conservation Values after the term expires. FWP does not claim that a term CE is a better value than a perpetual CE."

Conclusion

MWF supports the project and we applaud the landowners for their efforts to conserve their property and keep their working lands in family hands. But we object to the 99-year term and ask that this be moved forward as a perpetual conservation easement instead.

We look forward to advocating for a full, perpetual easement in front of the Land Board, and holding those five elected officials accountable for votes on something the local County Commission supports, the landowners want, and Montanans - especially the

sportsmen who are footing the bill for this - prefer.

Thank you for your careful consideration,

Kevin Farron, Conservation Director
The Montana Wildlife Federation

Q3

Respondent skipped this question

Optional: Upload your comments

#11

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Started: Tuesday, September 29, 2026 3:23:07 PM
Last Modified: Tuesday, September 29, 2026 3:25:41 PM
Time Spent: 00:02:34
IP Address: 66.62.126.145

Page 1

Q1

Contact information

Name:	Don Patterson
City/Town:	Hamilton
State/Province:	MT
Email Address:	d5357mt@gmail.com

Q2

Please comment on Hannah Ranch Conservation Easement

I support the proposed Hannah Ranch conservation easment because it Protects native grassland and shrubland, supports traditional cattle ranching, and provides public hunting access.

The Public Access: Expands recreational access to the property and creates a gateway to roughly 120,000 adjacent acres of the Helena-Lewis and Clark National Forest

Q3

Respondent skipped this question

Optional: Upload your comments

#12

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Started: Wednesday, September 30, 2026 7:24:19 AM
Last Modified: Wednesday, September 30, 2026 7:31:11 AM
Time Spent: 00:06:52
IP Address: 184.166.212.110

Page 1

Q1

Contact information

Name:	John W Howard
City/Town:	Bozeman
State/Province:	MT
Email Address:	jwh@prol.ws

Q2

Please comment on Hannah Ranch Conservation Easement

Make this Easement perpetual, not time-limited! There is simply no cogent argument to reduce the easement to a time-limited one, especially given the landowner's position favoring permanent.

Q3

Respondent skipped this question

Optional: Upload your comments

#13

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Last Modified: Wednesday, September 30, 2026 9:31:40 AM
Time Spent: 00:02:54
IP Address: 66.62.95.97

Page 1

Q1

Contact information

Name: Josephine VanDenburg-Crossman
City/Town: Corvallis
State/Province: MT
Email Address: pheinybean@gmail.com

Q2

Please comment on Hannah Ranch Conservation Easement

Project Concerns:

I'm strongly supportive of this project and grateful to the landowners for pursuing it. Conserving this land and expanding public access would be a significant benefit for wildlife, recreation, and the local community.

My concern is with the proposed 99-year term. I believe a perpetual agreement better reflects the long-term goals of the project, respects the landowners' stated preference, and provides greater certainty for future conservation and public access.

Q3

Respondent skipped this question

Optional: Upload your comments

#14

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Last Modified: Wednesday, September 30, 2026 3:50:56 PM
Time Spent: 00:06:32
IP Address: 179.64.121.71

Page 1

Q1

Contact information

Name:	Rochelle Gravance
City/Town:	Columbus
State/Province:	MT
Email Address:	rmg13@hotmail.com

Q2

Please comment on Hannah Ranch Conservation Easement

I support the project and the Gilbert family's commitment to conserving the ranch. The landowners want a perpetual conservation easement. So do Fergus County and most of the people who commented—more than 72 percent—called for permanent protection.

Montana would save just 5 percent while trading forever protection for an agreement that eventually expires. That is a poor return on sportsmen's dollars, and it would create a troubling precedent. Why would future landowners choose permanent conservation if they can receive nearly the same payment for a temporary agreement?

FWP's explanation is not convincing. The agency dismissed the perpetual alternative "due to some opposition to perpetual CEs," even though the landowners, county commissioners and majority of commenters support one. A small amount of opposition should not outweigh the landowner's wishes or prevent the Fish and Wildlife Commission from considering the strongest conservation option.

Do not settle for almost permanent when the landowners and the public are asking for permanent.

Q3

Respondent skipped this question

Optional: Upload your comments

#15

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Last Modified: Wednesday, September 30, 2026 5:25:15 PM
Time Spent: 00:11:22
IP Address: 38.92.160.19

Page 1

Q1

Contact information

Name:	Elizabeth Madden
City/Town:	Bozeman
State/Province:	MT
Email Address:	bethmadden64@gmail.com

Q2

Please comment on Hannah Ranch Conservation Easement

Please accept my comments on the proposed Hannah Ranch easement. A big thank you to all who worked to make this happen. As a recreation user of the Big Snowy Mountains, I greatly appreciate the opportunity of this new access. However, I strongly urge FWP to require that this be a perpetual easement, rather than 99 years. That just does not make monetary sense, and is in contrast to our standard operating and best practices for easements in Montana. Please re-consider this more short-sighted easement. It is not in the best interest of Montana's citizens. We do not want to invest in an easement that will eventually expire! Especially at that price (95% of perpetual cost!) And I have seen that the people of Fergus County are supporting this need for a perpetual easement as well - this is important locally.

Thank you for moving this forward, and for making it the best possible project for Montanans.

Q3

Respondent skipped this question

Optional: Upload your comments

#16

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Last Modified: Wednesday, September 30, 2026 10:04:04 PM
Time Spent: 00:06:33
IP Address: 65.131.205.209

Page 1

Q1

Contact information

Name:	Terry Zink
City/Town:	Marion
State/Province:	MT
Email Address:	zinksbigskyarcherytargets@gmail.com

Q2

Please comment on Hannah Ranch Conservation Easement

Commission chair & commissioners,

Please approve this easement, the family that owns this ranch wants this property in easement so it is never developed, this will open a lot of hunting opportunities on the north side of the snowies and access to more USFS land. I have hunted this as a younger years when growing up in Lewistown.

Thank you Terry L. Zink

Q3

Respondent skipped this question

Optional: Upload your comments

#17

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Last Modified: Thursday, October 01, 2026 7:19:22 AM
Time Spent: 00:02:57
IP Address: 174.234.2.240

Page 1

Q1

Contact information

Name:	Eric Scranton
City/Town:	Bozeman
State/Province:	MT
Email Address:	eric_scranton@hotmail.com

Q2

Please comment on Hannah Ranch Conservation Easement

The only decision that makes sense is to make the Hannah Ranch Conservation Easement permanent.
Thank you

Q3

Respondent skipped this question

Optional: Upload your comments

#18

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Thursday, October 01, 2026 9:59:35 AM
Last Modified: Thursday, October 01, 2026 10:05:42 AM
Time Spent: 00:06:06
IP Address: 172.221.81.112

Page 1

Q1

Contact information

Name: Janet Simpson Kransky
City/Town: Billings
State/Province: MT
Email Address: jkransky@gmail.com

Q2

Please comment on Hannah Ranch Conservation Easement

I'm in favor of the proposed perpetual conservation easement on the Hannah Ranch. I'm a nearby land owner and think we all benefit from the retention of Montana lands for agricultural and recreational use.

Q3

Respondent skipped this question

Optional: Upload your comments

#19

COMPLETE

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Last Modified: Thursday, October 01, 2026 2:51:06 PM
Time Spent: 00:02:08
IP Address: 184.166.145.42

Page 1

Q1

Contact information

Name:	Cindy Cohan
City/Town:	Butte
State/Province:	MT
Email Address:	ccohan@bresnan.net

Q2

Please comment on Hannah Ranch Conservation Easement

Put/Keep the Hannah Ranch Conservation Easement in place. Good for public access and wildlife.

Q3

Respondent skipped this question

Optional: Upload your comments

#20

COMPLETE

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Last Modified: Thursday, October 01, 2026 2:57:00 PM
Time Spent: 00:04:30
IP Address: 72.250.152.136

Page 1

Q1

Contact information

Name:	Lance Loving
City/Town:	Lewistown
State/Province:	MT
Email Address:	dragnlance@yahoo.com

Q2

Please comment on Hannah Ranch Conservation Easement

Thank you for doing this. Access to the Snowys is extremely limited and difficult. I can say that because of this, I have quit putting in for elk permits in the Snowys. Maybe if there is more access, I can think about trying to get an elk in the Snowys once again. As it stands now, if I get a permit, unless I have a fat wallet to pay the 10K to billionaires to hunt, I likely will not get a chance to even see one. Please put my name in the Please DO, list for this. Thank you once again

Q3

Respondent skipped this question

Optional: Upload your comments

#21

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Collector: Web Link 1 (Web Link)
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Last Modified: Thursday, October 01, 2026 4:35:04 PM
Time Spent: 00:02:44
IP Address: 174.45.183.126

Page 1

Q1

Contact information

Name:	Roger Furlong
City/Town:	Missoula
State/Province:	MT
Email Address:	roger@furlong.org

Q2

Please comment on Hannah Ranch Conservation Easement

Please ensure that the Hannah Ranch Conservation Easement is PERMANENT! It makes no financial sense to pay 95% of the total cost for a permanent easement for one that expires in the future.

I use public lands routinely and want to ensure that my great-grandchildren have the same opportunity.

Permanent easement status on the Hannah Ranch please.

Q3

Respondent skipped this question

Optional: Upload your comments

#22

COMPLETE

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Last Modified: Friday, October 02, 2026 6:29:27 AM
Time Spent: 00:01:12
IP Address: 97.245.227.62

Page 1

Q1

Contact information

Name:	Justin Doll
City/Town:	Great Falls
State/Province:	MT
Email Address:	j.doll6190@gmail.com

Q2

Please comment on Hannah Ranch Conservation Easement

Please pass the Hannah Ranch CE.

Q3

Respondent skipped this question

Optional: Upload your comments

#23

COMPLETE

Collector: Web Link 1 (Web Link)
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Last Modified: Friday, October 02, 2026 10:18:50 AM
Time Spent: 00:02:47
IP Address: 184.166.38.20

Page 1

Q1

Contact information

Name:	Brian Cassell
City/Town:	BOZEMAN
State/Province:	MT
Email Address:	brian.casselldvm@gmail.com

Q2

Please comment on Hannah Ranch Conservation Easement

This easement needs to be permanent. A 5% savings for a 99 year easement is no bargain whatsoever, simply wastes the money of sportsmen and is in conflict with sentiment of the public (including me) who vastly favor a permanent easement.

Q3

Respondent skipped this question

Optional: Upload your comments

#24

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Last Modified: Sunday, October 04, 2026 5:59:06 AM
Time Spent: 00:10:04
IP Address: 205.185.223.132

Page 1

Q1

Contact information

Name:	Glenn Elison
City/Town:	Lewistown
State/Province:	MT
Email Address:	glennelison@gmail.com

Q2

Please comment on Hannah Ranch Conservation Easement

The 3,652-acre Hannah Ranch property is rich in wildlife resources and outdoor recreational potential and opportunities. The owners, Jamie and Lisa Gilbert, are to be lauded for their past stewardship of the ranch and even more for their desire to seek perpetual conservation protection for the property and provide public access.

While I normally would enthusiastically embrace a conservation easement (CE) for the Hannah Ranch, I am deeply concerned with the new approach of a 99-year term conservation easement. The proposed 99-year CE instead of a permanent CE sets a bad precedent.

The owners want a permanent agreement. Wildlife and Montana's residents and visitors would benefit from the conservation and public access a permanent CE provides.

The independently appraised value for a permanent conservation easement is \$3,675,000. The independently appraised value for the 99-year term conservation easement is \$3,562,500. The difference in cost between eternal protection and 99-year protection is \$112,500, or three percent of the permanent conservation easement cost. The choice of the shorter-term CE appears, on its face, to be a poor use of public funds considering the enormous difference between 99 years and perpetual public benefits.

While 99 years is a long time in the context of a human's life span, consider the United State recently celebrated 250 years of independence. We hope for many more centuries of a thriving United States that values conservation and outdoor recreation for its citizens and visitors.

We are fortunate that President Grant did not opt for a 99-year lease on Yellowstone N.P. in 1872 or President Taft did not opt for a 99-year lease when he established Glacier National Park in 1910. 99 years ago, my father was in elementary school. 99 years is not a long time.

The underlying reason for advancing the 99-year conservation easement appears to be an effort to placate the Land Board or some of its members. The values of perpetual conservation and other public benefits are sufficiently compelling that a perpetual conservation easement should be forwarded to the Montana Land Board.

The proposed 99-year term CE is simply a poor choice considering the State's fiduciary responsibilities to Montana's citizens and resources. The economics of choosing a 99-year CE over perpetual protection are a bad investment of public funds. A perpetual conservation easement is the right decision.

Q3

Respondent skipped this question

Optional: Upload your comments

#25

COMPLETE

Collector: Web Link 1 (Web Link)
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Last Modified: Monday, October 05, 2026 11:02:56 AM
Time Spent: 00:03:41
IP Address: 66.113.49.92

Page 1

Q1

Contact information

Name:	Karli Johnson
City/Town:	Choteau
State/Province:	MT
Email Address:	karliJ@mfbf.org

Q2

Please comment on Hannah Ranch Conservation Easement

Please find attached letter of support on behalf of MFBF.

Q3

Optional: Upload your comments

MFBF Hannah Ranch Letter 10.5.26.pdf (476.1KB)

#26

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Tuesday, October 06, 2026 9:52:22 AM
Last Modified: Tuesday, October 06, 2026 9:58:31 AM
Time Spent: 00:06:09
IP Address: 144.86.220.113

Page 1

Q1

Contact information

Name:	Ben Hoesl
City/Town:	Lewistown
State/Province:	MT
Email Address:	ki7mfb@gmail.com

Q2

Please comment on Hannah Ranch Conservation Easement

Hello, my name is Ben Hoesl and I am writing to you today to express my support of the Hannah Ranch Conservation Easement. This easement would help protect wildlife habitat and wild lands in an area that is likely to see continued growth in the near future. This easement will also allow for public access into a large area of national forest in the Big Snowy Mountains that currently has very little access for the general public. This increased public access could also help with the reduction of an elk population in HD411 that is frequently considered "over-objective".

Thank you for your time,
Ben Hoesl

Q3

Respondent skipped this question

Optional: Upload your comments

#27

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Wednesday, October 07, 2026 4:36:19 PM
Last Modified: Wednesday, October 07, 2026 4:36:51 PM
Time Spent: 00:00:32
IP Address: 72.175.40.151

Page 1

Q1

Contact information

Name:	Charlie Booher
City/Town:	Lolo
State/Province:	MT
Email Address:	charlie@watershedresults.com

Q2

Please comment on Hannah Ranch Conservation Easement

Comments submitted on behalf of the Montana Association of Land Trusts.

Q3

Optional: Upload your comments

26-10-09 MALT Hannah Ranch Comments.pdf (24.9KB)

#28

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Thursday, October 08, 2026 2:47:57 PM
Last Modified: Thursday, October 08, 2026 2:51:43 PM
Time Spent: 00:03:46
IP Address: 184.167.233.181

Page 1

Q1

Contact information

Name:	Kevin P. Corbett
City/Town:	Whitefish
State/Province:	MT
Email Address:	kpcconifer@gmail.com

Q2

Please comment on Hannah Ranch Conservation Easement

Please see the attached Cost Benefit Analysis

Q3

Optional: Upload your comments

A Cost Benefit Analysis of the Proposed Hannah Ranch 99 Year Term Conservation Easement.pdf (332.1KB)

#29

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Friday, October 09, 2026 12:55:14 PM
Last Modified: Friday, October 09, 2026 4:45:11 PM
Time Spent: 03:49:57
IP Address: 159.111.24.145

Page 1

Q1

Contact information

Name:	Payton Betz
City/Town:	MISSOULA
State/Province:	MT
Email Address:	paytonbetzmtn@gmail.com

Q2

Please comment on Hannah Ranch Conservation Easement

I am writing to submit a comment regarding the proposed Hannah Ranch conservation easement. As a wildlife biology student in Montana, I recognize the importance of the efforts Jamie and Lisa Gilbert as they seek to perpetually protect their land and preserve its ecological value. As Montana continues to experience land development and subdivision, permanently protecting habitat and opportunities for outdoor recreation will become increasingly important for future generations. While I approve of the conservation of Hannah Ranch, I am concerned about the proposal to approve a 99-year term conservation easement instead of the traditional perpetual easement. This could set a precedent for any time a conservation easement is controversial to default for a shorter-term easement or lease. It will cost only 3% more to protect the property forever. I urge Montana FWP to protect the Hannah Ranch permanently, respect the owners and the benefit of Montanans.

Q3

Respondent skipped this question

Optional: Upload your comments

Lesley Robinson, Chair
Montana Fish and Wildlife Commission
c/o Commission Liaison Jesse May
PO Box 200701
Helena MT, 59620-0701

Re: Term Conservation Easement Valuation

Dear Chair Robinson & Members of the Commission:

The Montana Association of Land Trusts writes to express our concerns with the proposed 99-year Hannah Ranch Conservation Easement in Central Montana. We applaud the owners of Hannah Ranch for their desire to protect their private property permanently and hope to help them achieve their wishes however we can.

Conservation easements are a valuable and time-tested tool to compensate landowners who wish to protect the natural value of their land for future generations. For the last 50 years, perpetual easements have proved the gold standard of voluntary, incentive-based, long-term land conservation. We understand that the landowners in this case both desire a perpetual agreement and require appropriate financial compensation. It's unfortunate that, thus far, we have been unable to achieve both objectives.

Term leases and easements provide many benefits in the near-term, but the Hannah Ranch proposal saddles future generations with either the loss of these conservation values or a much higher price tag to renew the agreement after its expiration. The value of a term conservation easement, regardless of the length of the term, simply cannot compare to a perpetual agreement. The expenditure of public dollars involved in this case should seek to optimize benefits to Montanans.

The terms of any conservation easement are complex and take time to negotiate. We have continued to work with FWP and others to identify a better solution for the landowners and the citizens of the state of Montana and firmly believe that a perpetual conservation easement held by FWP will be the best solution for all involved.

We look forward to continuing to work with FWP to find a path forward that achieves the landowners' desires, makes full use of public and private funds, and provides perpetual benefits to the people of the state of Montana.

Sincerely,
Montana Association of Land Trusts



100 Red Mountain Drive, Suite 101
Bozeman, MT 59718
406-587-3153
info@mfbf.org | mfbf.org

Montana Fish and Wildlife Commission, c/o commission liaison Jesse May, P.O. Box 200701, Helena, MT 59620-0701

October 5th, 2026

Dear Fish and Wildlife Commissioners:

Thank you for the opportunity to comment on the proposed 99-year conservation lease, Hannah Ranch. While we will not be commenting on the specific details of the proposed lease, we would like to express our strong support for the broader concept of providing long-term conservation leases as an alternative to perpetual easements.

Montana Farm Bureau is the state's largest agricultural membership organization, serving nearly 20,000 member families across Montana. Our members raise a wide variety of crops and livestock while serving as dedicated stewards of both public and private lands.

Our membership has long supported the development of alternatives to perpetual easements. We recognize that easements are often an effective tool for preserving the long-term intended use of land and can provide a critical financial lifeline for landowners who find themselves asset-rich but cash-poor. Easements can generate needed revenue that helps keep land in agricultural production, though this benefit comes at the cost of relinquishing certain private property rights.

The more conservation options available to farmers and ranchers, the better. Flexibility in conservation agreements allows landowners to choose approaches that best meet their individual goals, whether those goals are preserving agricultural land, supporting wildlife habitat, maintaining open space, or addressing financial challenges. Expanding the range of available tools strengthens both conservation outcomes and the long-term viability of working agricultural operations.

Our members understand that conservation is not static. It is an ongoing process that evolves with changing environmental conditions, technologies, management practices, and community needs. A 99-year lease, as an alternative to a perpetual easement, provides an opportunity for future generations to evaluate and adjust conservation strategies as circumstances change. This flexibility helps ensure that, a century from now, the land can continue to serve its highest and best use while still achieving meaningful conservation objectives.

Thank you again for the opportunity to comment and thank you to Director Clark and her team for pursuing this creative solution to a longstanding challenge.

Sincerely,

Cynthia Johnson

We Care for the Country

A Cost Benefit Analysis of the Proposed Hannah Ranch 99 Year Term Conservation Easement

Kevin P. Corbett, Ph.D.
PO Box 4903
Whitefish, MT 59937

Executive Summary:

1. The Montana Department of Fish, Wildlife and Parks (FWP) declined to prepare a cost benefit analysis of the proposed Hannah Ranch 99 year term conservation easement (CE). Based on the analysis presented here the total proposed “purchase” price of \$3,746,515 (including \$220K for grazing improvements) cannot in any meaningful way be justified. The proposed payment is egregiously large and unsupportable for the following reasons:
2. The Hannah Ranch CE is not a purchase in-fact, only in-name. For all intents and purposes it functions as a 99 year habitat preservation lease paid up-front, as all rights revert to the property owners at the end of the term. In this regard it would stand out as the only non-perpetual CE in Ferguson County. Statements in the Environmental Assessment (EA) notwithstanding, this indicates the long-term goal of the property owners is not environmental protection and stewardship.
3. The Hannah Ranch EA states, “Historical and current land use of this 5th generation working ranch is primarily livestock (cattle) grazing;” (EA p.7). The department of FWP has failed to establish the property will have significant foregone value, or that the value of the property exceeds the value for grazing in any significant way. There is no evidence the habitat is threatened by any of the hypothetical threats identified, as the highest and best use for the property is continued cattle grazing.
4. The public benefit gained is minimal. Specifically, the only committed direct public benefit will be the 0.53 mile (2798 Ft) of perpetual easement to the public, foot access only, to National Forest land on the NW end of the Snowy Mountains. At \$3.75 million dollars, this equates to \$1,339/Ft, for the perpetual walk-in easement, which in a best case scenario will be used 6 months or less per year. There is no commitment to public access to the lands placed under the CE, for hunting or any other purpose. The singular indirect benefit is habitat preservation. This benefit is illusory at best, as there is nothing within the language of the deed that in any way restricts the Gilbert family, their heirs or successors, from altering current use patterns, and any proposed development threats are simple fallacious given the economics of Ferguson County and the lands location, topography and elevation.
5. Accordingly, the value of the Hannah Ranch conservation easement cannot exceed the discounted value of cattle grazing for that portion of the easement suitable for such activity. For a 99 year term, this value ranges from a low of \$546,387 for grazing on a \$/Ac basis to a high of \$764,721 on a \$/AUM basis (Table 1, Appendix).

Economic Analysis:

The results of my economic analysis are presented in Table 1:

Up-Front Cash Payment Proposed by FWP Hannah Ranch 99 Year Conservation Easement	Value of a Discounted (5.5%) 99 Year Term Lease Paid Annually	Bond Investment Value of \$3.75 million for 99 Years in U.S. 30 Year bonds @ 5.5% Annual Interest	Estimated Undiscounted Grazing Rights Value based on historical \$/AUM cost forward projected 99 years	Estimated Discounted (5.5%) Grazing Rights Value based on historical \$/AUM cost forward projected 99 years	Estimated Undiscounted Grazing Rights Value based on historical \$/Ac-Yr cost forward projected 99 years	Estimated Discounted Grazing Rights Value based on historical \$/Ac-Yr cost forward projected 99 years
\$3,746,515	\$846,683	\$20,585,227	\$5,990,385	\$764,721	\$3,767,033	\$546,387

Table 1. Comparison of economic value assessments Hannah Ranch proposed CE.

In evaluating the value of a CE on the “The Logan Place”, and the “O’Brien Place”, the two disconnected parcels selected by the Gilbert family for this proposed conservation easement, what must be evaluated is the value derived by Montana hunters, fishermen and citizens at large from the conditions the easement places on the land, and any economic value forgone by the Gilbert family in accepting the terms, conditions and restrictions incumbent with the easement. Money for easements such as this, as well as the majority of general funding for FWP, is derived principally from those who purchase Montana hunting or fishing licenses. Thus they are the primary constituency for CE’s. In the interest of the Gilbert family, the question is what diminution in value occurs, if any, from placement in the term easement, and what enhancement in value, if any, the Gilbert family gains owing to the moneys received. I note in both cases, the timing of the receipt of value matters and must be accounted for. The time value of money is highly pertinent.

What diminution in value occurs for the Gilbert family for placement of the proposed acreage into a 99 year conservation easement? The cattle business in Montana is historically challenging, a few have prospered and many have failed (<https://www.barnesandnoble.com/w/free-grass-to-fences-robert-henry-fletcher/1112417067>). The Hannah Ranch, the Gilbert family, are survivors, and should be congratulated for their success. That said, the principle question remains, what diminution in value occurs if the properties in question are placed in a 99 year term conservation easement? Arguably none, as the grazing improvement assistance of \$220,000 will improve yearling survival and weight gain, and the owners will still be grazing their cow-calf pairs after the easement as they were prior to it taking effect. As a cattle ranching property, the value rises and falls with the price of beef and cost of raising cattle. Over the last three years the average annual price of beef has risen significantly faster than the cost of grazing cattle in Montana, 8.77% per annum for beef prices (<https://www.ers.usda.gov/data-products/food-price-outlook/summary-findings>) as opposed to 6.77% increase in cost for grazing (<https://www.montana.edu/extension/aglease/Grazing.html>). Rebuilding herds requires time, and there is no indication increase in the size of the overall U.S. beef cattle herd population is imminent

(<https://texasfarmbureau.org/drought-eases-but-beef-cow-herd-faces-challenges-to-rebuild/>). Thus, the expectation is that cattle prices will continue to outrun grazing cost for at least a decade. Clearly, it is a good time to be in the cattle business and will be for a long time to come. I can attribute no diminution in value to the CE on the Hannah Ranch properties, as the CE places no restrictions on cattle grazing and would in that event have minimal impact on any potential sale value. I find no value reduction for the Gilbert family for placing these properties into the CE.

The proposed payment of \$3.75 million up-front for the CE is within the range I determined for undiscounted cattle grazing on the proposed easement lands. If the Gilbert family were to lease their land for grazing, as opposed to grazing their own animals, the revenues for grazing would be realized on an annual basis for 99 years. Equally, they would realize the sale of yearling calves on an annual basis, if they choose to graze their own cattle on the land. Regardless, of whose cattle graze the land, the value is realized annually across 99 years, not this year in a single payment, and as such the present value of those future cash flows must be determined, the Net Present Value (NPV), at a discount reflective of what the investment could realize if invested differently. The discount rate in this case is 5.5%, the 3 month averaged interest rates on 30 year U.S. Treasury bonds, a highly safe alternative investment. It should be noted, this is a no-profit discount rate, it is simply a preservation of value rate. Fundamental to economic analysis in an inflationary environment is the realization that a dollar today is more valuable than a dollar in the future, and the further that dollar is in the future the less value it retains.

While the Hannah family is long established in the area, “The Logan Place” and the “O’Brien Place” (Figure 1, p.5 of the EA), based simply on the names of the two parcels included in the EA, were likely properties acquired at some point by the Hannah Ranch/Gilbert family, not homesteaded by their heirs. Consolidation of agricultural interest is a long-standing dynamic in the United States (<https://www.ers.usda.gov/media/8855/eib-189.pdf?v=70661>), as increased size allows for more efficient deployment of capital. The likelihood that this property would be used for any other purpose in the foreseeable future is negligible. The population of Fergus County decreased by 3.0% from 2010 to 2020, and by 17% between 1980 and 2020 (<https://fergusmt.gov/images/disaster-emergency/24.07.annexf-ferguscounty.pdf>) page F-3. There is no likelihood this land will be developed for residential or other purposes, nor subdivided into smaller parcels. The remote nature of the property, its comparatively high elevation, difficult seasonal access, and lack of existing infrastructure, coupled with the declining population of Fergus County, indicate development potential is negligible to non-existent. Accordingly, the value of the land is the agricultural value, which is the cattle grazing value. This value is easily established from the total acres to be placed under the CE, the percentage of the acreage that is non-irrigated grazing land (EA Figure 6, P. 11), the carrying capacity of the land (<https://www.beefresearch.ca/tools/carrying-capacity-calculator-method-1/>), and the long-term trends in the lease value of non-irrigated grazing acreage. Lease expense is easily accessed and estimated from data made available to the public by the Montana State University Agricultural ExtensionService:(<https://animalrangeextension.montana.edu/forage/documents/forage%20consumption%20estimated%20AUM%20conversion.pdf>),(<https://www.montana.edu/extension/aglease/Grazing.html>),and (<https://www.montana.edu/extension/aglease/statewideleaserates.html>).

Based on historical analysis, current usage and the population dynamics of Ferguson County over the last 46 years, the greatest economic value of the lands proposed for the Hannah Ranch CE is cattle grazing for

the foreseeable future. **The minimum value, \$546,387, is established by the discounted grazing value on a \$/Ac-Yr basis, and the maximum value, \$764,721, is established by the discounted \$/AUM basis, (table 1).** The only direct benefit is the proposed perpetual walk-in easement of 0.53 miles. We can expect there will be no change in the quality of the habitat under the Gilbert family, who have demonstrated the ability to manage cattle grazing for the long term and habitat preservation will be a consequence of conservative grazing management. Habitat is the sole defined indirect benefit of the CE. This ostensible benefit has no definable measurable value, as there is no expectation that land management practices will change with the advent of the CE. I invite those asserting any significant value increase through the CE to habitat value or access value to demonstrate same, as nothing in the EA accomplishes this goal. There are no determinations of existing use of the paved road into the Snowy Mountains 4 miles to east, nor other access points into this range on which to base an estimate of the use profile of the proposed walk-in easement. As to habitat value, there are no population studies or surveys presented of existing large mammal use, head counts and days on the land, nor for any other wildlife. The habitat value was completely undefined in the EA.

Conclusions:

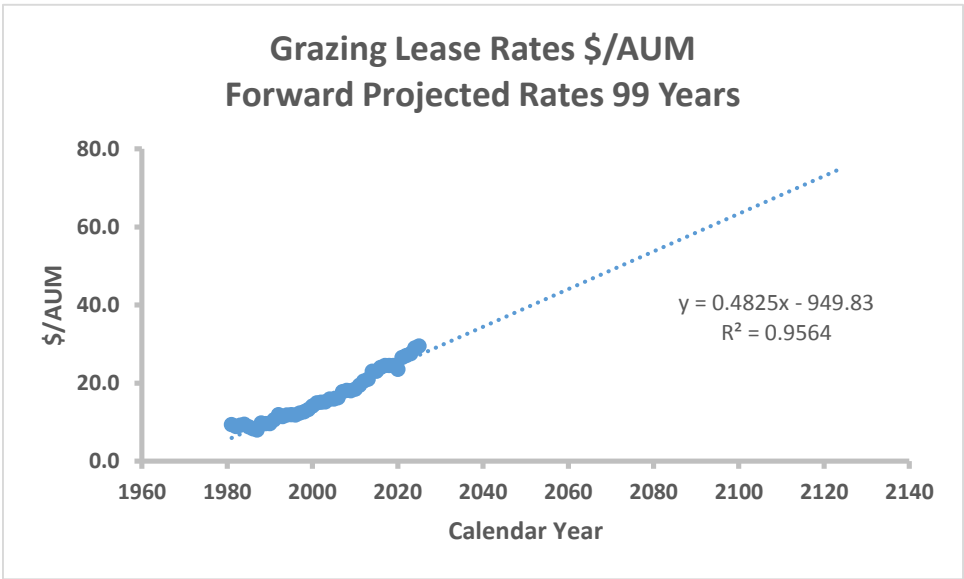
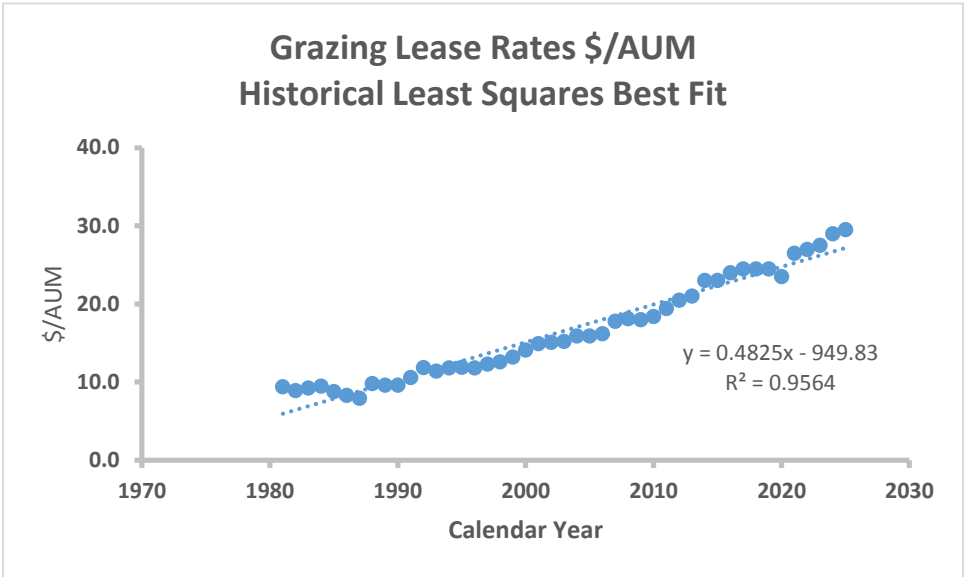
The No Action alternative is the only defensible economic choice under the proposal presented. FWP has proposed and recommended a 99 year Term Conservation Easement at a total up-front cost of \$3,746,515 for two disconnected properties, The Logan Place and the O'Brien Place on the Hannah Ranch in the western foothills of the Snowy Mountains in Fergus County, MT. FWP declined to present a Cost-Benefit analysis for this acquisition and has defined only one tangible value, a perpetual walk-in easement to National Forest land at a cost of \$1,339/Ft of access, and one intangible benefit, habitat protection, which they cannot demonstrate is enhanced by funding the CE. The value received is *De minimis* for the proposed cost. FWP fails to acknowledge they are not purchasing a CE, they are in fact leasing a CE for 99 years and paying the lease cost up-front as opposed to incrementally. Incumbent on the Director of FWP and the Commission is to act in the best interest of all Montanan's. Demonstrably, approval of this CE is not in the general best interest of the majority of Montana citizens. The No Action alternative is the only defensible economic choice.

Appendix:

Value of 99 Year Term Lease

Year	Lease Payment	Cumulative Payments	NPV(5.5)	Year 1 Includes grazing upgrades
2027	255265	3746515	\$846,683	
2028	35265			
2029	35265			
2030	35265			
2031	35265			
2032	35265			
2033	35265			
2034	35265			
2035	35265			
2036	35265			
2037	35265			
2038	35265			
2039	35265			
2040	35265			
2041	35265			
2042	35265			
2043	35265			
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2107	35265			
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2109	35265			
2110	35265			
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2112	35265			
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2114	35265			
2115	35265			
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2117	35265			
2118	35265			
2119	35265			
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2124	35265			
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2126	35265			

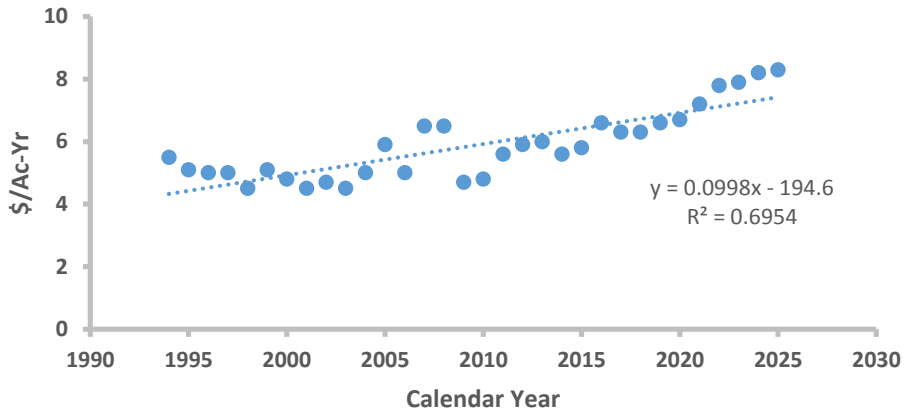
Grazing Lease Rates \$/AUM



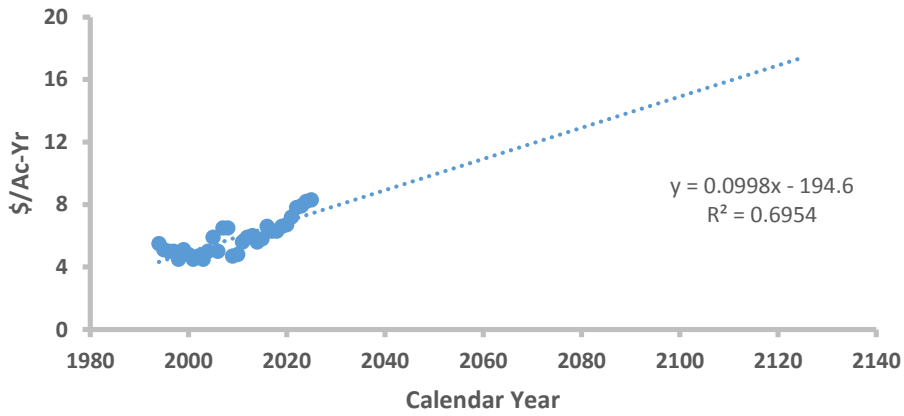
Grazing Rates AUM \$-Mo

Year	AUM	Leaseable Acs	AUM/Lease- Ac	Net \$ Undiscounted	NPV5.5	
2025	29.5	2556	0.45	33931	\$764,721	
2026	27.7	2556	0.45	31878		
2027	28.2	2556	0.45	32433		
2028	28.7	2556	0.45	32988		
2029	29.2	2556	0.45	33543		
2030	29.6	2556	0.45	34098		
2031	30.1	2556	0.45	34653		
2032	30.6	2556	0.45	35208		
2033	31.1	2556	0.45	35763		
2034	31.6	2556	0.45	36318		
2035	32.1	2556	0.45	36873		
2036	32.5	2556	0.45	37428		
2037	33.0	2556	0.45	37982		
2038	33.5	2556	0.45	38537		
2039	34.0	2556	0.45	39092		
2040	34.5	2556	0.45	39647		
2041	35.0	2556	0.45	40202		
2042	35.4	2556	0.45	40757		
2043	35.9	2556	0.45	41312		
2044	36.4	2556	0.45	41867		
2045	36.9	2556	0.45	42422		
2046	37.4	2556	0.45	42977		
2047	37.8	2556	0.45	43532		
2048	38.3	2556	0.45	44087		
2049	38.8	2556	0.45	44642		
2050	39.3	2556	0.45	45197		
2051	39.8	2556	0.45	45752		
2052	40.3	2556	0.45	46307		
2053	40.7	2556	0.45	46862		
2054	41.2	2556	0.45	47417		
2055	41.7	2556	0.45	47972		
2056	42.2	2556	0.45	48527		
2057	42.7	2556	0.45	49082		
2058	43.2	2556	0.45	49637		
2059	43.6	2556	0.45	50192		
2060	44.1	2556	0.45	50747		
2061	44.6	2556	0.45	51302		
2062	45.1	2556	0.45	51857		
2063	45.6	2556	0.45	52412		
2064	46.1	2556	0.45	52967		
2065	46.5	2556	0.45	53522		
2066	47.0	2556	0.45	54077		
2067	47.5	2556	0.45	54632		
2068	48.0	2556	0.45	55187		
2069	48.5	2556	0.45	55742		
2070	48.9	2556	0.45	56297		
2071	49.4	2556	0.45	56852		
2072	49.9	2556	0.45	57406		
2073	50.4	2556	0.45	57961		
2074	50.9	2556	0.45	58516		
2075	51.4	2556	0.45	59071		
2076	51.8	2556	0.45	59626		
2077	52.3	2556	0.45	60181		
2078	52.8	2556	0.45	60736		
2079	53.3	2556	0.45	61291		
2080	53.8	2556	0.45	61846		
2081	54.3	2556	0.45	62401		
2082	54.7	2556	0.45	62956		
2083	55.2	2556	0.45	63511		
2084	55.7	2556	0.45	64066		
2085	56.2	2556	0.45	64621		
2086	56.7	2556	0.45	65176		
2087	57.1	2556	0.45	65731		
2088	57.6	2556	0.45	66286		
2089	58.1	2556	0.45	66841		
2090	58.6	2556	0.45	67396		
2091	59.1	2556	0.45	67951		
2092	59.6	2556	0.45	68506		
2093	60.0	2556	0.45	69061		
2094	60.5	2556	0.45	69616		
2095	61.0	2556	0.45	70171		
2096	61.5	2556	0.45	70726		
2097	62.0	2556	0.45	71281		
2098	62.5	2556	0.45	71836		
2099	62.9	2556	0.45	72391		
2100	63.4	2556	0.45	72946		
2101	63.9	2556	0.45	73501		
2102	64.4	2556	0.45	74056		
2103	64.9	2556	0.45	74611		
2104	65.3	2556	0.45	75166		
2105	65.8	2556	0.45	75721		
2106	66.3	2556	0.45	76276		
2107	66.8	2556	0.45	76830		
2108	67.3	2556	0.45	77385		
2109	67.8	2556	0.45	77940		
2110	68.2	2556	0.45	78495		
2111	68.7	2556	0.45	79050		
2112	69.2	2556	0.45	79605		
2113	69.7	2556	0.45	80160		
2114	70.2	2556	0.45	80715		
2115	70.7	2556	0.45	81270		
2116	71.1	2556	0.45	81825		
2117	71.6	2556	0.45	82380		
2118	72.1	2556	0.45	82935		
2119	72.6	2556	0.45	83490		
2120	73.1	2556	0.45	84045		
2121	73.6	2556	0.45	84600		
2122	74.0	2556	0.45	85155		
2123	74.5	2556	0.45	85710		
2124	75.0	2556	0.45	86265		
2125	75.5	2556	0.45	86820		
2126	76.0	2556	0.45	87375		
				5990385	Total 99 Year \$	

All Pasture Avg Grass Lease \$/AC-Yr Historical Least Squares Best Fit



All Pasture Avg Grass Lease \$/Ac-Yr Forward Projected Rates 99 Years



All Pasture Avg Grass Lease \$/AC-Yr

YEAR	\$/Ac/Mo	Leaseable Acs	Net \$ Undiscounted	NPV Discounted @ 5.5%/Yr
2025	10	2556	25560	\$546,387.0
2026	10.1	2556	25795	
2027	10.2	2556	26030	
2028	10.3	2556	26265	
2029	10.4	2556	26501	
2030	10.5	2556	26736	
2031	10.6	2556	26971	
2032	10.6	2556	27206	
2033	10.7	2556	27441	
2034	10.8	2556	27676	
2035	10.9	2556	27912	
2036	11.0	2556	28147	
2037	11.1	2556	28382	
2038	11.2	2556	28617	
2039	11.3	2556	28852	
2040	11.4	2556	29087	
2041	11.5	2556	29322	
2042	11.6	2556	29558	
2043	11.7	2556	29793	
2044	11.7	2556	30028	
2045	11.8	2556	30263	
2046	11.9	2556	30498	
2047	12.0	2556	30733	
2048	12.1	2556	30968	
2049	12.2	2556	31204	
2050	12.3	2556	31439	
2051	12.4	2556	31674	
2052	12.5	2556	31909	
2053	12.6	2556	32144	
2054	12.7	2556	32379	
2055	12.8	2556	32615	
2056	12.9	2556	32850	
2057	12.9	2556	33085	
2058	13.0	2556	33320	
2059	13.1	2556	33555	
2060	13.2	2556	33790	
2061	13.3	2556	34025	
2062	13.4	2556	34261	
2063	13.5	2556	34496	
2064	13.6	2556	34731	
2065	13.7	2556	34966	
2066	13.8	2556	35201	
2067	13.9	2556	35436	
2068	14.0	2556	35672	
2069	14.0	2556	35907	
2070	14.1	2556	36142	
2071	14.2	2556	36377	
2072	14.3	2556	36612	
2073	14.4	2556	36847	
2074	14.5	2556	37082	
2075	14.6	2556	37318	
2076	14.7	2556	37553	
2077	14.8	2556	37788	
2078	14.9	2556	38023	
2079	15.0	2556	38258	
2080	15.1	2556	38493	
2081	15.2	2556	38729	
2082	15.2	2556	38964	
2083	15.3	2556	39199	
2084	15.4	2556	39434	
2085	15.5	2556	39669	
2086	15.6	2556	39904	
2087	15.7	2556	40139	
2088	15.8	2556	40375	
2089	15.9	2556	40610	
2090	16.0	2556	40845	
2091	16.1	2556	41080	
2092	16.2	2556	41315	
2093	16.3	2556	41550	
2094	16.3	2556	41785	
2095	16.4	2556	42021	
2096	16.5	2556	42256	
2097	16.6	2556	42491	
2098	16.7	2556	42726	
2099	16.8	2556	42961	
2100	16.9	2556	43196	
2101	17.0	2556	43432	
2102	17.1	2556	43667	
2103	17.2	2556	43902	
2104	17.3	2556	44137	
2105	17.4	2556	44372	
2106	17.5	2556	44607	
2107	17.5	2556	44842	
2108	17.6	2556	45078	
2109	17.7	2556	45313	
2110	17.8	2556	45548	
2111	17.9	2556	45783	
2112	18.0	2556	46018	
2113	18.1	2556	46253	
2114	18.2	2556	46489	
2115	18.3	2556	46724	
2116	18.4	2556	46959	
2117	18.5	2556	47194	
2118	18.6	2556	47429	
2119	18.6	2556	47664	
2120	18.7	2556	47899	
2121	18.8	2556	48135	
2122	18.9	2556	48370	
2123	19.0	2556	48605	
2124	19.1	2556	48840	
2125	19.2	2556	49075	
2126	19.3	2556	49310	
			3767033	