



October 21, 2015

Mark Albers
District Manager
United States Bureau of Land Management
920 Northeast Main St.
Lewistown, MT 59457

*Protecting
Montana's wildlife,
land, waters,
hunting and fishing*

Dear Mr. Albers,

The Montana Wildlife Federation strongly opposes the transfer of the Durfee Hills from federal public ownership to private ownership under the proposed Wilks Brothers Bullwhacker Land Exchange. Furthermore, we oppose the inclusion of an option to transfer the Durfee Hills to private ownership in any alternative plan of action in an Environmental Assessment or Environmental Impact Study contemplated for the Bullwhacker Land Exchange Proposal.

Bureau of Land Management regulations and federal law require any land exchange to be on a value-for-value basis and in the best long-term interest of the public. The Wilks land exchange proposal fails both these tests. As our analysis demonstrates below, the Durfee Hills represent exponentially greater value to the public than does the Anchor Ranch parcel. The public interest will be harmed by such an exchange on several levels, not the least of which is the bad precedent for future land exchanges.

In our assessment of the proposal submitted to BLM on Aug. 25, 2015, we have consulted with several wildlife biologists in Helena, Malta, Havre and Lewistown field offices of BLM as well as with Montana Fish, Wildlife & Parks. Our opposition is based on an objective comparison of:

- wildlife habitat;
- huntable populations of elk, mule deer and greater sage-grouse;
- public access and hunting opportunity; and
- the precedent that would be set for other landlocked parcels of federal public lands.

Our assessment of habitat condition for elk, mule deer and greater sage grouse shows that the Anchor Ranch and surrounding private parcels to be vastly inferior to habitat in the Durfee Hills. The private parcels in and around the Anchor Ranch are mostly dry sagebrush and grass heavily grazed by livestock under federal permit on a relatively flat plateau above the Missouri River Breaks. The small stands of conifers there offer no real big game security, especially during hunting season. The sage-grouse habitat is poor and there are no known leks on the Anchor

Ranch. Water away from the river is scarce and mostly ephemeral. Overall, the Anchor Ranch and surrounding private parcels offer limited habitat for elk, mule deer and greater sage-grouse.

In contrast, the habitat for mule deer and elk in the Durfee Hills is excellent, although it too is not prime sage grouse habitat. Desirable grasses, shrubs and forbs appear to be abundant and well-watered. Numerous springs and small streams provide riparian habitat and drinking water for wildlife. The vast conifer forest provides excellent big game security and is interspersed with meadows of essential big game forage.

In comparing huntable populations of wildlife, we found that there are no resident populations of elk or greater sage-grouse and few mule deer on the Anchor Ranch Bullwhacker parcel. There are transitory movements of relatively few of the species through the property, and the lack of tree cover for security tends to diminish use of the area by these species during the hunting season. According to the area wildlife biologists, elk and mule deer largely confine themselves to better habitat and cover on BLM lands north of the Anchor Ranch and to Lion Coulee south of the ranch.

In contrast, elk numbers in the Durfee Hills, which is in deer and elk hunting districts 530/411, are consistently high due to much superior habitat conditions and protective cover even under growing hunting pressure and harvest. In fact, the elk population throughout HD 530/411 is estimated at 5,200 animals, with roughly 2,000 inhabiting the Durfee Hills and surrounding private lands. Mule deer in the Durfee Hills are less often hunted because elk are the dominant game species at this time, and the competition from the large elk herd tends to limit mule deer use of the available habitat.

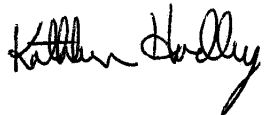
The hunter use and harvest data from 2004 through 2014 reflects a low abundance of elk, mule deer and greater sage-grouse on the Anchor Ranch and throughout the rest of hunting district 680. For the 2015 hunting season, the entire HD 680 (beyond Anchor Ranch) is limited to elk hunting by permits for bulls and cows, whereas HD 530/411 (Durfee Hills) allows any general elk license holder to hunt spike bull and antlerless elk, plus 6,100 permits for either sex and antlerless elk. The greater hunter opportunity in HD 530/411 compared to HD 680 is shown clearly in the number of hunter-days from 2004 through 2014. Herd Unit 680 ranged between 100 and 533 hunter-days per year throughout the herd unit, with relatively few hunters using the Anchor Ranch area (the open sagebrush plateau). In contrast, HD 530/411, ranged from 1,120 to 2,563 hunter-days per year.

Hunter access to the Anchor Ranch area is primarily by vehicle on dirt roads, whereas hunting use across the sagebrush plateau is walk in. Even though the Bullwhacker Road has recently been closed to public, access to the surrounding public lands remains on Ervin Ridge Road, Cow Island Trail and the Spencer Cow Camp Road. Walk-in hunting access is relatively easy and unrestricted on public lands surrounding the Anchor Ranch, although it is not heavily used because of low game numbers and limited hunter success. In contrast, public access to the Durfee Hills is by aircraft, with at least four landing strips on two-track roads on the lower slopes on public lands. Local hunters are now regularly using small airplanes to access the Durfee Hills, at relatively low cost that is affordable to many everyday hunters. Public hunting use, including youth hunting, of the Durfee Hills is growing, with about 200 hunter-days per year occurring at this time and consistently good elk harvest.

In addition to the land values, MWF has serious concerns with allegations of improper fence construction and trespass onto the federal public lands in the Durfee Hills by the Wilks Ranch. These have the potential to impede wildlife migration, spread noxious weeds and cause other natural resource damage that will harm wildlife, habitat and public hunting opportunity. While these remain allegations, it is imperative that BLM investigate this issue and take the proper steps to remedy any potential violations.

In our assessment, the land values of the Anchor Ranch and surrounding private land parcels are not even closely comparable to the Durfee Hills public land values. There is little evidence of wildlife habitat and public hunting opportunity in the Anchor Ranch area, including on the adjacent public lands, while there is superb wildlife habitat and good public hunting opportunity in the Durfee Hills public lands. The public interest is best served by excluding the Durfee Hills public lands from any proposal to exchange public lands for the Anchor Ranch private land parcels.

Sincerely,

A handwritten signature in black ink that reads "Kathy Hadley". The signature is written in a cursive, flowing style.

Kathy Hadley

President