



*Protecting
Montana's wildlife,
land, waters,
hunting and fishing
heritage since 1936*

March 9, 2016

Gary Bertellotti
Regional Supervisor
Fish, Wildlife and Parks - Region 4
4600 Giant Springs Road
Great Falls, MT 59405

RE: Draft Environmental Assessment for Acquisition of DNRC Inholdings in the Sun River, Beartooth, and Blackleaf Wildlife Management Areas

Dear Mr. Bertellotti:

The Montana Wildlife Federation (MWF), which for 80 years has represented Montana sportsmen and women to protect Montana's wildlife and habitat, has reviewed the draft EA to allow Montana Fish, Wildlife and Parks to acquire fee title to Montana Department of Natural Resources Conservation (DNRC) Trust lands inholdings within the Sun River, Beartooth and Blackleaf Wildlife Management Areas (WMAs). MWF supports Alternative B to acquire the lands.

The importance of these WMAs for wildlife and habitat and their value to Montanans cannot be understated. The Sun River Game Preserve was created through bipartisan action of the Montana Legislature in 1913. The Sun River WMA, purchased in 1947, was one of the first WMAs in Montana and was secured through private donations to anchor the eastern tip of the Game Preserve. The Rocky Mountain Heritage Act, adopted through bipartisan action of Congress in December 2014 culminated years of effort by local landowners and hunters to secure the spectacular Rocky Mountain Front for future generations. The Blackleaf WMA to the north provides important habitat for elk, mule deer and grizzly bears coming off the Front. Continuing to the south leads to the Beartooth WMA which provides core security habitat for a unique collaboration of agencies, hunters and landowners known as the Devils Kitchen Group to manage area wildlife. These WMAs provide key year long and seasonal habitat for a variety of wildlife species. They also provide seasonal grazing habitat to wildlife such as elk and mule deer to relieve depredation on adjacent private lands.

DNRC Trust Lands have been an important component of WMAs, comprising 17 percent, 17 percent and 6 percent of the Sun River, Beartooth and Blackleaf WMAs respectively. However, the scattered inholdings provide some challenges to long-term management. In addition, DNRC is required to maximize revenue from Trust Lands, which will lead to ever-increasing lease fees into the future. There is also the specter of higher competitive bids for inholdings for non-conforming uses which would greatly detract from the value and purpose of the WMA.

Acquisition of the 9,488.26 acres of scattered parcels within the WMAs by FWP would remove uncertainty over those lands and consolidate ownership to allow for better long-term planning and management. In addition, the purchase would allow DNRC to meet their obligation to maximize revenues from Trust lands.

This acquisition is funded in part by the Habitat Montana program. It represents yet another example of how Habitat Montana supports common-sense conservation that protects habitat, improves public access, enhances management efficiency, and alleviates wildlife conflicts on private lands.

Approving Alternative B in the draft EA is a real investment in protecting habitat and ensuring public hunting opportunity on these iconic wildlife management areas.

Thank you for the opportunity to comment.

Sincerely,

A handwritten signature in blue ink that reads "Dave Chadwick". The signature is written in a cursive, flowing style.

Dave Chadwick
Executive Director