

October 18, 2023

Matt Hogan, Regional Director  
Mountain-Prairie Region, USFWS  
Lakewood, CO

Dear Regional Director Hogan:

The undersigned hunting and fishing conservation organizations are excited about the opportunity for the U.S. Fish and Wildlife Service to establish a Missouri Headwaters Conservation Area in the High Divide region of southwest Montana. This conservation area would enable the USFWS to leverage Land and Water Conservation Fund dollars to conserve up to 250,000 acres of private working lands in the coming decades through conservation easements in one of the most important landscapes in North America.

Characterized by high elevation mountain ranges, expansive sagebrush steppe and broad valleys, the High Divide is a linchpin for connecting the three major ecosystems of the Northern Rockies: Greater Yellowstone, Selway Bitterroot, and Northern Continental Divide. This area is comprised of a mix of state, federal, and private land and—in recent years—has received considerable attention from conservation, hunting, and fisheries interests because of its habitat and connectivity values. The High Divide is also under increased pressure for subdivision and other human development, and the area's wildlife and connectivity values are at risk.

Recognizing a conservation opportunity, the USFWS in 2021 began working with local stakeholders, landowners, and decision makers to build agreement around a conservation area that could bring LWCF dollars to the Big Hole, Beaverhead, and Madison River watersheds to keep private working lands intact and undeveloped. Those constructive discussions helped bring the USFWS to where they are today, and the agency is now soliciting public comment on the proposed conservation area.

As the USFWS works to complete this Strategy, we encourage the agency to consider the enormous conservation opportunity in the region. Specifically, we believe that LWCF funded conservation easements should be used in a Missouri Headwaters Conservation Area to:

- Conserve habitat for ungulate migrations and winter range for elk, bighorn sheep, pronghorn, mule deer, and moose in a landscape has been identified as a priority in the Montana Fish, Wildlife and Parks SO 3362 Action Plan.
- Safeguard and restore sagebrush and greater sage grouse core habitat, helping to maintain populations and keeping the bird off the threatened species list.
- Protect cold water recharge zones and riparian habitat to support upper Missouri River Westslope cutthroat trout and Arctic grayling, helping keep these native fish—including the last remaining fluvial Arctic grayling population in the lower 48—off the threatened species list.
- Conserve connectivity habitat for grizzly bears, which would support the bear's long-term recovery and help the USFWS complete and defend a federal ESA delisting.

The USFWS is on the precipice of a timely and impactful conservation opportunity in the High Divide. We hope the Missouri Headwaters Conservation Area comes to fruition and that it helps to address a myriad of conservation needs in the Northern Rockies. We appreciate your consideration of our request.

Sincerely,

Anaconda Sportsmen's Club

Big Sky Upland Bird Association

Hellgate Hunters and Anglers

Jefferson Valley Sportsmen's Association

Montana Chapter of Backcountry Hunters & Anglers

Montana Trout Unlimited

Montana Wild Sheep Foundation

National Deer Association

National Wildlife Federation

North American Grouse Partnership

Ravalli County Fish and Wildlife Association

Skyline Sportsmen's Association

Theodore Roosevelt Conservation Partnership