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September 26, 2016

Jason Crowder
Wyoming Office of State Lands and Investments
Herschler Building 3W
122 W 25th Street
Cheyenne, WY 82002

Dear Mr. Crowder:

The Wyoming Wildlife Federation, the state's oldest conservation and sportsperson organization, opposes the proposed Bonander Ranches, LLC land exchange.

The Laramie Range in southeast Wyoming has had chronic issues related to its fragmented, mixed ownership. It is a patchwork of private, U.S. Forest Service, BLM, and State lands. Public lands there can be difficult to access; and many square miles are unavailable because of, in some cases, a small amount of private land between them and a public road. And, the public has lost much access in this area through similar land transactions over the years.

Access for outdoor recreation, a dominant component of Wyoming's tourism industry, continues to be more important as the Front Range, including southeast Wyoming, grows. Over 1 million more people are predicted for the Greater Denver area by 2030. Southeast Wyoming is becoming more popular for recreation, and more crowded. What access we have will become more precious as more people try to find outdoor recreation opportunities close to home.

Improving access to the Cow Creek area was a high priority for Wyoming Game and Fish Commission (WGFC) in the past, and in the 1990s it negotiated access into that area from the north off Road 710 through private and State lands. After the public finally gained reasonable access to the public lands in the Cow Creek area with the addition of the northern access, this proposed exchange constitutes a step backward and defeats WGFC's considerable efforts by eliminating one of the two access points.

Eliminating access to the southern end of the Cow Creek area with this exchange would contribute to the gradual but continuous decline in access and dispersed recreational opportunities in southeast Wyoming. And this will have local economic impacts. There will be less use of this area due to fewer recreationists being able to access the southern public lands there (disperse themselves) and their tolerance of crowding at the remaining access point. Meanwhile, public recreation on the land Bonander Ranches would acquire from the State and the public lands isolated by the exchange would be

available only to a few big game hunters allowed by Bonander Ranches, which are unlikely to contribute much to the local economy. Loss of this access will affect recreationist spending in local communities, such as Glendo, Wheatland and Douglas.

The Bonander Ranches' land in the Moskee area of the Black Hills that it proposes to exchange for the Cow Creek land in a "value for value exchange with the need of a cash equivalent payment" offers no significant additional access to adjacent public lands. So, the public suffers a net loss of access overall in this proposed exchange. The Moskee land would help block up publicly accessible lands, but the access benefits are not equal to those lost in the Cow Creek area. The Detailed Analysis of this proposals states, "Lastly, the proposed exchange would be a direct loss of approximately 720 acres, and an indirect loss of public access to over 8,000 acres of state and federal lands in the Laramie Range, which would reduce overall hunting opportunity with impacts to sportsman (sic?) and wildlife management."

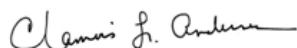
The WGFD analysis letter that is part of the analysis materials states, "Habitat alteration, specifically in shrub and aspen communities, has occurred on this parcel in some locations as a result of utilization by livestock and wild ungulates. Riparian habitat along the stream bank has been impacted by Livestock. This parcel, as well as the State Trust Lands acquired in 2013 (as noted in the Moskee Exchange map), are fenced into private land pastures." These lands may be of similar appraised value, but certainly are not equal from the standpoints of ecological condition or access.

Certainly, transactions involving State lands must foremost benefit the state's schools. However, we believe that land exchanges should, whenever possible, provide benefits to the public beyond the generation of income to the schools and the administrative and management advantages whenever possible. We support land exchanges in the Laramie Peak area that block up and facilitate access to public lands in this area (USFS Laramie Peak administrative unit) so there is no net loss of access, or perhaps even gains, there. This proposed land exchange appears to benefit one entity significantly while offering little benefit to the other citizens of Wyoming.

We fear more of this type of land exchange may come if federal lands are transferred to the state or the state takes on management of those lands. We are concerned that immediately obvious economic benefits or urgencies will overshadow the broader, long-term societal benefits in land exchanges and disposals. And, we are concerned that the overall result will be the public losing access at an abnormal rate, especially in areas of mixed land ownership, as key parcels that provide access to large blocks of other public lands come under private ownership, as is possible in this case, thereby rendering those other lands effectively private. The beneficiary will be the person or organization that essentially gets many more times the land for their sole use than they actually purchased or traded. The results for the general public will be negative.

Thank you for the opportunity to comment on this proposal.

Sincerely,



Chamois Andersen, Executive Director