



**BACKCOUNTRY
HUNTERS & ANGLERS
MONTANA**

October 24, 2019

Mary Erickson, Forest Supervisor
Custer-Gallatin National Forest
P.O. Box 130
Bozeman, MT 59771

RE: Proposed South Crazy Mountains Land Exchange

Dear Supervisor Erickson,

The Montana Chapter of Backcountry Hunters & Anglers (MT BHA) represents more than 3,000 dedicated and active sportsmen and women, and is Montana's fastest growing public land, water and wildlife conservation organization.

MT BHA appreciates the Custer-Gallatin National Forest's efforts to consolidate public land parcels within the Crazy Mountains through the proposed South Crazy Mountain Land Exchange. However, we do not support the full proposal. Specifically, we do not support the exchange of public land sections 4 and 8 (Township 2 N., Range 11 E.) for private sections 11, 13 and 21 (Township 3 N., Range 11 E.).

These sections are already legally and easily accessible for public walk-in access through Rock Creek Road #199 (via Trail #270). Additionally, these sections are the epitome of quality public land and wildlife habitat and would be a major loss for the public if traded for sections 11, 13 and 21, which do not hold anywhere near the same value of quality habitat and ease of public access.

The high-quality, mid-elevation and lowland wildlife habitat for deer, elk, bear and upland birds offered in Sections 4 and 8 is a rarity in the greater Crazy Mountain landscape. The Rock & Smeller lake sections (11 and 13), on the other hand, offer little in terms of wildlife habitat other than that of mountain goats, of which the Crazy Mountains are currently experiencing a population decline. This drop in mountain goat numbers will most likely result in a reduction in tag allotments for this hunting unit, meaning a reduction in opportunity for public land hunters (in other words, public access to mountain goats here isn't the number one concern of MT BHA and our members). Sections 4 & 8 are in FWP hunting unit 315 which offers OTC opportunity for deer and elk hunting whereas sections 11, 13 and 21 are in mountain goat hunting unit 313 which offers a total of only 20 opportunities for the whole unit. A recent (2019) mountain goat survey of the Crazy Mountains by the Rocky Mountain Goat Alliance and FWP that included Smeller Lake showed the second lowest total of goats from survey sites at Smeller Lake (5 of a total 91 goats counted).

Smeller and Rock lakes - which the public would gain in sections 11 & 13 - are already being stocked by FWP as recently as 2012 and 2019 respectively (according to FWP online database). In the Forest Plan consistency section of the proposal (pg. 5) it is mentioned that there is a goal to "Maintain and enhance fish habitat to provide for an increased fish population." Acquiring poor fish habitat that requires routine stocking of hatchery trout in exchange for a self-sustaining Yellowstone cutthroat fishery (Rock Creek, currently publicly accessible in Sections 4 & 8) that is much more easily accessible (both in distance and length of seasonal availability) is not in the best interest of the public. Additionally, the upper portions of Rock Creek that are on public land currently are considered barren based on FWP surveys, meaning the public will completely lose the productive parts of Rock Creek fishery.

The proposed reroute of trail 272 is only needed if section 8 is exchanged, which we ask that it not be. This trail reroute project would require Crazy Mountain Ranch to only pay up to \$75,000 of the reroute, meaning that in the event that the reroute costs more than that, the Forest Service would be using tax-payer dollars



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to reroute a trail to which we currently have legal public access. Estimates made by Forest Service staff at the Livingston open house on October 23, 2019 indicate that average costs for trail construction is \$12,000 to \$15,000 per mile, and that the costs for this trail construction project would likely not be completely covered by the Crazy Mountain Ranch's contribution.

This potential reroute also introduces a noticeable increase in elevation and increased length that will serve as a barrier to some public users trying to access their public lands. Rerouting Trail #272 does not solve the very first problem described in the reroute proposal as there still would be no recorded easement across section 25 which would provide the supposed access from Cottonwood Creek to the intersection of Rock Creek Road #199. The maps displayed during the 10/23 open house in Livingston are different than the ones included in the proposal. Maps displayed in Livingston show Trail #272 completely bypassing section 25 but it was admitted that that is a potential future plan which means more trail work that will cost taxpayers additional funds.

We disagree with the assertion made in the draft Environmental Assessment that the portion of the trade described above would *improve* public hunting and fishing opportunities, and rather we would argue that this portion of the proposal would significantly *degrade* public hunting and fishing opportunities in the Crazy Mountains and would work directly against the items listed in the "Need for Action" portion (1.3) of the proposal.

- Relocation of trail #272 is not a pre-existing condition – it is a condition created by including section 8 in this exchange proposal.
- Limited seasonal availability (lakes only open for very short period of the summer) and a declining mountain goat population indicates that exchanging sections 4 and 8 would greatly decrease the fishing and hunting opportunities available, as well as take away other existing low-elevation recreation opportunities.
- Fish habitat at Rock and Smeller lake is poor and not self-sustaining, as evidenced by the ongoing stock program run by FWP as recently as July of this 2019.
- Exchanging low-elevation quality habitat for steep peaks and cliffs with limited seasonal access opens up the possibility for lower elevation quality habitat to unknown development that can still persist despite the voluntary conservation easement; the likelihood of the development (commercial or residential) of the higher reaches of the interior range, however, is astronomically low, especially considering the survey results indicating that the higher reaches are devoid of valuable resources.

MT BHA understands the challenges of managing the Crazy Mountains with inholdings of private land and public access disputes. In that regard, we do support the portion of the proposal to exchange public land sections 2 and 12 (Township 2 N., Range 11 E.) for private sections 31 and 33 (Township 3 N., Range 11 E.) and public section 8 (Township 2 N., Range 12 E.) for private section 1 (Township 2 N., Range 11 E.).

We appreciate the continued efforts by the Custer-Gallatin National Forest to consolidate public lands and resolve access issues in the Crazies. MT BHA cannot fully support the current proposal as written; sacrificing sections 4 and 8 would be significant losses for the public. If those sections are dropped from the proposal, the land transfer would have our full support.

Sincerely,

Dane Rider, Region 3 Board Member
Montana Chapter Backcountry Hunters & Anglers

