



November 18, 2019

US Forest Service – Bozeman Office  
Attn: Mary Erickson, Forest Supervisor  
PO Box 130  
Bozeman, Montana 59771

**RE: Preliminary Environmental Assessment for the South Crazy Mountains Land Exchange**

Dear Ms. Erickson:

Thank you for the opportunity to comment on the preliminary Environmental Assessment for the South Crazy Mountains Land Exchange. This land exchange includes areas within Montana Fish, Wildlife & Parks (FWP) Regions 3 and 5.

**General Comments:**

The primary big game hunting opportunities in this area are for elk, black bear, mule deer, and mountain goat. Elk habitat in the sections being transferred from USFS to private owners range from poor to excellent.

We are providing our comments below from west to east in the area considered for the land exchange.

**Forest Ownership to Private Ownership:**

- Sections 8 and 4 in Park County: Excellent elk habitat in the spring and fall, but neither have wintering grounds within them. There is no public access to these sections.
- Section 2 in Park County: Excellent elk habitat in the spring, summer, and fall but does not provide good winter range. Rock Creek offers public access opportunities to this section.
- Section 12 in Park County: Marginal elk habitat as most of the section is steep and rocky with no public access.
- Section 8 in Sweetgrass County: Poor elk habitat as it is steep and rocky and with no public access.

**Private Ownership to Forest Ownership:**

- Section 31 in Park County: Excellent elk habitat in the spring, summer, and fall but does not contain winter range. It provides access to adjacent USFS section 36 which lies to the west.
- Sections 31 and 33 in Park County: Excellent elk habitat in the spring, summer, and fall but there is no winter range. Adding these sections to USFS ownership makes a large block of contiguous good to excellent elk habitat. This will increase access for everyone, and hunters will especially benefit.

- **Section 21 in Park County:** Part of the section contains great elk habitat, especially the head of Sheep Creek. The rest of the section is good mountain goat habitat. Adding this section to USFS ownership would maintain continuity of goat habitat, providing hunters more opportunity.
- **Sections 11 and 13 in Park County:** Great goat habitat and provides good hunting opportunities while also increasing angling opportunities at Rock Lake and Smeller Lake.

**Cottonwood Lowline Trail No. 272:**

Most of the proposed reroute of this trail follows existing two track trails on USFS and private land. There is a lot of illegal ATV use in the area and we have concerns this reroute only will cause illegal ATV use to increase, especially on the newly acquired section 31. Currently, there are well-used ATV trails leading north into section 31 from adjacent private land in section 6. FWP suggests the USFS add appropriate signage and physically block these routes. If illegal ATV use continues, it could degrade elk security and hunter opportunity. For elk security reasons, we support the proposal to make this trail for non-motorized travel only.

The proposed reroute connects to Rock Creek Trail No. 270 through a private land in section 3. The EA states that trail easements will be granted by the private landowner and the landowner is to construct the new trail or pay the USFS \$75,000 to construct the trail. FWP recommends connecting the new part of Trail No. 272 to Trail No. 270 through section 34, which is USFS land. Both sections 3 and 34 are topographically steep making trail construction difficult but keeping the trail on public land would eliminate trespassing risk.

FWP disagrees with the EA's assessment of Trail No. 272 on elk use and security in that area. The EA states that the reroute will not reduce elk security and habitat because the trail is to be designated as non-motorized. Most of the currently mapped trail does not exist, therefore a new trail is going to make it significantly easier for hunters to access the area. The exchange will result in a larger block of hunting terrain making the area more desirable to hunters. This could lead to a significant increase in hunting pressure and elk displacement on these lands.

**Nongame and Species of Concern:**

There are historic locations of Canada lynx and other animals classified as Species of Concern (SOC) within the proposed land exchange. These species include wolverine, hoary bat, little brown myotis, golden eagle, great gray owl, northern goshawk. This is not a complete list of species and a more inclusive list can be viewed on the Montana Natural Heritage Program website.

**Conclusion:**

FWP is pleased to note that private landowners receiving forest sections have agreed to keep conservation easements on those sections so that wildlife habitat will be maintained. Additionally, we have no concerns the land exchange may have significant implications SOCs or their habitat. We encourage the planning staff to reference Montana's Statewide Outdoor Recreation Plan (SCORP) 2014-2018, which creates a roadmap to consider outdoor recreation services and resources throughout Montana for improved quality of life for residents. Survey results by residents of Montana in the SCORP state that all types of recreational trails are very important in their lives.<sup>1</sup> Access to natural landscapes and time spent outdoors have been well-documented in providing numerous physical and mental health benefits, greater awareness of

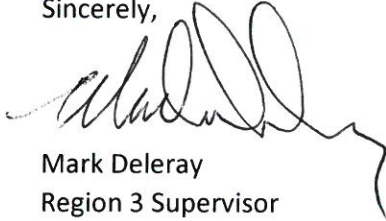
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<sup>1</sup> Montana's Statewide Outdoor Recreation Plan (SCORP)- <http://stateparks.mt.gov/about-us/scorp.html>

environmental concerns, and improved community interactions between residents, neighbors, and visitors. We believe this land exchange would be positive for habitat conservation, hunter opportunity, and recreational access.

Thank you for allowing FWP the opportunity to comment. We look forward to working with you further on this effort. If there are additional questions regarding wildlife, please contact Howard Burt (406) 994-6935 or [hburt@mt.gov](mailto:hburt@mt.gov) and for fisheries questions please contact Travis Horton at (406) 994-3155 or [thorton@mt.gov](mailto:thorton@mt.gov).

Sincerely,



Mark Deleray  
Region 3 Supervisor

*Barb S Beck*

Barb Beck  
Region 5 Supervisor

