

I appreciate the opportunity to comment on the proposed East Crazy Inspiration Divide Land Exchange. I would like to start by expressing my opposition to the proposal as written. I ask that you choose Alternative A- No Action.

Issues

1. Inspiration Divide and the East Crazies should not be linked in one land swap. These two landscapes are completely disparate. Just looking at the Need for Action portion of the PEA speaks to how unrelated these swaps are. Only bullet point *three* speaks directly to the need at Inspiration Divide, “To improve recreational opportunities and provide for perpetual public access in both the East Crazies, Smeller Lake and along *Inspiration Divide*”. The rest of the needs for action, there are seven of them total, do not speak directly to the need at Inspiration Divide. The Crazies are mentioned throughout.

These swaps need to be split apart. It is hard to see how the scope of one falls into the scope of the other. The only link that can be seen between the two from the outside is the influence of the Yellowstone Club. If these swaps cannot be split into two documents, then the public deserves additional Alternatives. For example, accept the swap in one location but not the other.

2. Access in Sweetgrass Canyon is effectively abandoned by the PEA. This proposal, without question, reduces access potential. Many arguments claim that we, the public, are gaining more access in this proposal. In fact, we are losing access. Though disputed, the USFS has a long documented history of access and disputes at Sweetgrass Road (Rein Lane) into the Sweetgrass drainage. The East Trunk Trail, and Sweetgrass canyon trail were clearly built and maintained by the USFS for decades.

We should not ever solve access disputes by caving to individual landowners who construct gates, sign-in boxes, or by threatening public landowners with arrest or worse. This PEA effectively awards that behavior by granting a private landowner's wishes while abandoning the Public's trust. The USFS is supposed to be in the forever business. I would rather this access be disputed for the next two centuries, even if I never get to enjoy legal access to these places, and eventually come to an agreement based on change in ownership and ideology, or with a court decision. The precedent set here could unimaginably damage the Public's ability to access land across the nation.

3. The land traded in the East Crazy portion of this swap does not seem of equal value. Before this swap proceeds, a thorough analysis of all values traded must be divulged to the public. We must know the actual market value of each parcel as determined by an independent appraisal. This appraisal must take into account the fact that we are not requiring any conservation easements or deed restrictions as the PEA is written. Therefore, the land must be valued based on ability for future development opportunities including the potential to gain easy access to these previous USFS parcels. The land we are receiving must be valued based on development potential as well, but the appraisal should take into account whether these lands were ever able to be accessed for development not to mention the slope and build potential of the lands we are receiving.

While natural resources and ecosystem services can be hard to value, we should attempt to value the loss in water rights, mineral rights, timber value, grazing rights, and potential recreation opportunities in Sweetgrass Canyon. A thorough valuing of habitat must be well

documented and understood before the PEA can move forward. Additionally, we should never, under any circumstances, trade sections 8 and 10 in Sweetgrass canyon. These sections are amazing resources with gentle slopes, stream access, our current trail/road, incredible views of this glacial canyon, ample recreation opportunities, riparian habitat and more. Giving these two sections up is unimaginable. Please, go visit Eagle Park, look around and take it in. Consider that you already own this land but this PEA will trade it away **forever**.

4. Corner crossing is an unsettled issue. We should not move forward based on an assumption that we will never be able to gain access to the “checker board” sections within the PEA. The USFS should at least wait until corner crossing becomes settled County, State or National case law before moving this land swap forward. As an alternative, we could pursue very small easements from one corner to the other to secure access to these sections. This would allow for a trail that more closely mimics the traditional East Trunk trail while preserving our low elevation habitat.

Please see my attached map and the trail drawn in orange. The public could utilize this trail temporarily until corner crossing is settled or in perpetuity.

5. Conservation easements/Conservation based Deed restrictions are not included in the PEA as mandatory. Without specific conservation easements/deed restrictions available for public view, conservation minded public landowners should not support this swap. The highly valuable, lower elevation land that we trade away could be developed to the landowner's desire without these important restrictions. There is no way the USFS can find No Significant impact without the use of these conservation tools.

Questions

I would like to ask some questions that I cannot specifically find the answer to in the PEA.

-If Alternative B is chosen, will this result in a change to the FS administrative boundary? If not, why? We will no longer own land in the lower one mile (Sec 12, 24, 36) between Sweetgrass and Big Timber Canyons.

-The PEA speaks to a desire to consolidate land in the Crazies, Why is this important in this instance? If ease of land management is desired, then why would we trade away our administrative access points? Won't this make land management more difficult, not easier in the future?

-This PEA does not consolidate all checkerboard in the Crazies, many private inholdings will remain. Can we public landowners expect attempts at more consolidation in the future? If so, over what timeline?

-To what extent can landowners with private sections within the Crazies reasonably develop their land right now? The PEA speaks to blocking up the interior of the Crazies to limit development in the more primitive areas that are currently private. The USFS can/will deny all road based access to these areas unless an easement currently exists correct?

-Do the private landowners in Sweetgrass drainage currently have an easement to cross sections 8 and 10 in Sweetgrass drainage by vehicle?

-Has the USFS done a thorough accounting of all Heritage sites on the sections we propose to swap? What will the USFS do with these sites?

Thank you for the opportunity to participate and leave my comment. I appreciate the amount of work the USFS and other groups have put into this proposed land swap. I oppose the presented singular alternative, but I do not oppose the attempt at moving this issue forward. Your effort does not go unnoticed, unfortunately this is the wrong solution at the wrong time.