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Comments: I am opposed to the South Crazy Mountains Land Exchange as it is currently being proposed. I have intimate firsthand experience with this area. I have spent many days hiking and hunting on the sections that are proposed to be exchanged. Having this firsthand experience with this area gives me a unique perspective on this proposal, and knowledge that I believe is being purposefully withheld from the public. The Preliminary Environmental Assessment published by the USFS on the South Crazy Mountains Land Exchange withholds critical information from the public and paints this proposal in a much different light than it truly is.

The exchange of USFS Sections 4 & 8 for Crazy Mountain Ranch Sections 11, 13 & 21 is touted as being an equitable trade which is far from the truth. The following are some of the many reasons why I am opposed to this portion of the land exchange:

1)Access: The PEA states that Trail 272 has no recorded easements from Cottonwood Creek to the intersection of Rock Creek Road 199. However, the PEA neglects to highlight the fact that access to USFS Section 8 is immaterial because Trail 270 intersects Road 199 and road 199 has a perfected easement across Sections 9 and 10 that accesses USFS Section 8. Additionally, there is zero mention of the fact that an anomaly in the original survey between Sections 8 and 4 created a 40+' overlap between these sections, allowing for legal access between Sections 8 & 4. If you have hiked in this area or you did your own independent research one may have come to this conclusion, but these facts are either not highlighted or are purposefully withheld. The PEA paints the exchange between USFS and CMR to be a trade of 2 inaccessible sections for 3 accessible sections. Additionally, it is a fact that Section 8 is the most easily accessible section of public land (by foot) on the entire south end of the Crazy Mountains. The proposed exchange pushes the public land much further from the trailhead than it currently is. If the proposed exchange goes through, the rerouted Trail 272 would be 2.2 miles longer and there would be an additional 1500' elevation gain before you step foot on public land. That's not an increase in public access.

2)Land Value: The fact that an appraisal has not yet been conducted on the sections that are proposed to be exchanged is appalling. Particularly, the exchange between USFS and CMR needs an accurate appraisal. USFS Sections 4 & 8 are some of, if not the most prime public land habitat in all of the Crazy Mountains. There is no question that if Sections 4 & 8 were listed for sale in the private sector that they would sell for more money than CMR Sections 11, 13 & 21. How can I make a statement that is this bold? Simple, there are no roads to the CMR sections and the only motorized access to any of these sections is Motorcycle access to Section 11. Unless you own your own helicopter, this land is not accessible. Not to mention, when you compare habitat, the sections are hardly comparable. The USFS sections are prime grazing land and exceptional lowland deer and elk habitat not to mention there is self-sustaining wild cutthroat trout fishery in Rock Creek in Section 8. The CMR Sections are rocky alpine peaks that are nearly void of vegetation, they do contain Rock Lake and Smeller Lake, but these lakes are naturally sterile and are only supported by stocked fish. The CMR sections have no value for grazing, the only value that I see these sections having if they were to sell would be mineral and water rights, which CMR conveniently retains these rights. So CMR gets to retain the valuable assets of Sections 11, 13 & 21 and then they also acquire Sections 4 & 8. The math just doesn't add up.

3)Direct Purchase: The USFS says direct purchase is not an option. However, if no appraisals have been conducted how can this statement be made? Appraisals must be conducted prior to proceeding with this exchange, particularly with CMR. I will not say that the high peaks in the Crazy Mountains don't have any value, because they do have exceptional beauty, however they have little to no value from a private land farming and ranching perspective (which is the predominant land use in the area). If the CMR land had an accurate appraisal performed there would be the potential opportunity for Land and Water Conservation Funds or funds from private conservation organizations to be used to make a direct purchase of these lands. Saying that direct purchase is not an option is short sighted, if a cash offer has not been made. Everything in the private sector is for sale for the right price and I think direct sale for these alpine sections would get a great deal of support from the public and conservations groups.

My other concerns with the land exchange are expressed well by attached detailed review of the South Crazy Mountains Land Exchange Preliminary Environmental Assessment prepared by Greg Scheeler. I worked with Greg during the preparation of this document and I wan to express that I share in the views that are outlined in this document.

My final comment is a question, why would these landowners be agreeable to this deal if it was bad for them? Thanks for taking the time to consider my position on this proposal.

Ian Wargo