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Title:

Comments: South Crazy Mountain Land Exchange Comments to FS.

Having discussed various sources of information about the land exchange, Skyline Sportsmen's Association opposes the land trade. We realize that the FS is trying to obtain outlying private land in order to block up FS boundaries for management purposes. However, in this case, we cannot see where there will be any reduction in management costs and public access options are questionable. In addition, the public would be net losers from this trade. There are just too many additional requirements which would result from the acquisitions.

From Preliminary Frequently Asked Questions, October 25, 2019.

"The resource values and the public objectives served by the non-federal lands or interest to be required must equal or exceed the resource values and the public objectives served by the Federal lands to be conveyed." We believe that requirement would not be met by this land exchange.

There are several instances where we believe that the public would be shortchanged by this land exchange:

1. Sections 4 and 8 are considered good habitat for livestock and therefore elk. The interest by landowners in this trade is to acquire valuable land in exchange for rock piles, thus increasing outfitting opportunities. How can the public benefit from such a trade?

2. I have read accounts that say sections 4 and 8 have access. If so, why trade them?

According to the information on Frequently Asked Questions, section 4 has access, then states that there is no recorded access to section 8. This followed by the statement "Sections 4 and 8 have a gap between the corners of approximately 48 feet." Another account said that they overlapped 48 feet. Come on people, can't you come up with a solution to this gigantic problem?

3. Sections 11 and 13 have a total of 106 mineral owners. How many mines are there? It doesn't take very many mines to clutter up two sections. Those sections could, and probably have, roads everywhere. What about pollution from those mines? Who will pay for any contamination that is present or that may occur in the future? These two sections have very little value and may have great liability. We do not need those.

4. Block management has no chance. The purpose of Block Management is to increase public access. This land would be off limits to the recreating public. The purpose of this trade is to increase outfitting of our publicly owned wildlife.

5. The parties involved in the exchange have voluntarily agreed that conservation easements "CE" will be placed on all of the Federal parcels being conveyed into private ownership." Better be careful here. (CE)s cannot be done before consummation of the trade. (CE)s have to be approved by the Land Board. They also have to be done with an entity that does (CE)"s. Also, if landowners just say "buzz off" after the trade is made, what recourse is there?

6. Administrative roads should not exist. Public money (FS budget) will have to pay for maintenance. Why not allow public use?

7. There are various water rights that could be involved in this trade. Who is going to manage these rights and settle disputes? Could be expensive and ongoing forever.

In conclusion:

a. This trade does not consider the value of public wildlife which is the main reason for this trade. The FS should document public wildlife value before even considering any trade. Reportedly some outfitters receive as high as \$15,000 from customers for trophy elk. Considering this, the public is not getting much for their elk.

b. This land exchange is not needed. Buy those sections. If landowners are not interested in selling, walk away. Be great for the public. Put all those employees, who have probably spent months researching and putting this acquisition together, out doing something more useful. A drive through any forest shows many useful things that need to be done.