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To:

Custer Gallatin National Forest

US Forest Supervisor Mary Erickson P.O. Box 130, Bozeman, MT 59971

Project 56687 - South Crazy Mountains Land Exchange Public Comment

Dear Supervisor Erickson:

On October 3, 2019, the Custer Gallatin National Forest released the Preliminary Environmental Assessment for the South Crazy Mountains Land Exchange. According to page 1 of the Introduction, it states the purpose of this document is to disclose any and all "anticipated environmental effects" resulting from the exchange. The proposed action entails the approval of three independent land exchanges of National Forest Service (NFS) land in the Crazy Mountains with three private landowners having land withholdings bordering or surrounding said NFS lands. These three separate private entities are: Philip Morris USA, Inc. (Crazy Mountain Ranch (CMR)), Rock Creek Ranch I, Ltd. (RCR), and Wild Eagle Mountain Ranch LLC (WEMR). As a result, if approved, 3,797 acres of private land will be exchanged for 3,225 of NFS lands; all lands located in the South Crazy Mountains of south-central Montana. The Forest Service only allowed a 45 day public comment period for a proposal which much of the public may be unaware of or uninformed about.

The Forest Service has released a Preliminary Environment Assessment for a land exchange in the South Crazy Mountains. The information in the PEA makes it appear to be a good deal, but the PEA only tells half the story.

The Custer Gallatin National Forest has proposed trading about 1,305 acres of public land there to the Crazy Mountain Ranch, a private retreat owned by the tobacco giant Philip Morris. In exchange, the Forest Service would get 1,920 acres of privately owned land deeper in the mountains to the north, including two sections surrounding two high elevation lakes deep in the mountains to the north.

The truth is the Crazy Mountain Ranch part of the exchange is a very bad deal because the public gives up two sections (4 and 8) of prime big game habitat and an exceptional self-sustaining native cutthroat trout fishery. In return the public would get Rock and Smeller lakes and an inaccessible section while alpine lakes are desirable, their value for wildlife pales in comparison to the habitat wildlife would lose instead of a trade with a Swiss tobacco company, a Swiss-domiciled multinational cigarette and tobacco manufacturing company, with products sold in over 180 countries headquartered in Switzerland and worth billions (7.91 billion in earnings in 2018, and 39.80 Billion dollars in total assets) for lands that are much less valuable for hunters, fisherman, hikers and wildlife does not represent what Montanans want.

the forest service should be looking at a purchase of private land and consolidate ownership and designate the property as wilderness, the most protective land designation, and protect it for present and future generations. This is what Montanans want. In a 2018 survey from the University of Montana, it is clear that Montanans want more wilderness and with land purchase by the Forest Service we can add wilderness quality land.

After learning that three percent of the state's lands are currently dedicated as wilderness, support for dedicating additional lands as Wilderness increases.

Just three percent of Montana lands are currently dedicated as wilderness areas. Knowing this, would you support or oppose dedicating additional, existing public lands as wilderness areas here in Montana? TABLE GRAPHIC contained within attachment.

Protection and consolidation of the Crazy Mountains is incredibly important:

1. It is an important wildlife corridor
2. There is a bill in congress that states the importance of corridors
3. Biological connectivity for Grizzly
4. Consolidation of checker boarded lands was successfully done in the Gallatin Range
5. States support protection of corridors

While the other two deals in the package aren't as controversial, but we need to look closely at them. The trade with the Crazy Mountain Ranch has become a flashpoint. Hunters like the elk and deer habitat it offers. Anglers like the stretch of Rock Creek there, which is full of trout. It has attracted the ire of some conservation groups, too, such as the Montana Wildlife Federation and Backcountry Hunters and Anglers, Gallatin Wildlife Association and Gallatin Yellowstone Wilderness Alliance who have all written comments not favoring this land swap.

The deal's critics see it as the Forest Service giving away a wild trout fishery and prime deer and elk habitat for rocks, ice and two stocked lakes. And when you look at the pictures and the number of ag acres we will get for the prime habitat acres Montanans will give up, I hope you will see this trade and the other trades in this package need more time and public scrutiny.

It is said that we are giving up the best habitat the public holds, and I agree. Other points that make this trade not in the best interest of Montanans and the wildlife they cherish are:

1. It is an important wildlife corridor

Please look at the Northern Rockies Ecosystem Protection Act. This map was made by the famous Craighead brothers and the NREPA Biological corridors have been replicated by other scientists that show the same corridors. The corridor goes from the northern front of the Absaroka Beartooths to and through the Crazy Mountains to the Big Belts and from there to the Little Belts and on to the Northern Rockies. The science is clear about the importance of this corridor. This is a bill in Congress.

MAP contained within the attachment

2. There is a bill in Congress that states the importance of corridors to protect ecosystems.

Wildlife Corridors Conservation Act of 2018 would:

[bull] Create a Wildlife Connectivity Database that will include standardized, quality data to inform wildlife

connectivity decisions across the United States and support decision-makers by collecting and disseminating information to states, tribes, and federal agencies

[bull] Grant authority to key federal agencies to designate National Wildlife Corridors to support connectivity, resilience, and adaptability of native fish, wildlife, and plant species on public lands

[bull] Establish Regional Wildlife Movement Councils that will develop Regional Wildlife Movement Plans, identifying priority areas on non-federal lands to protect essential resources and maintain biological movements, which would be funded by a Wildlife Movement Grant Program

Corridors are recognized as hugely important, 100 years ago reserves were enough, now (more than ever) we need to protect what is left by identifying and protecting corridors for wildlife.

3. Biological connectivity for Grizzly

There is increasing public interest and a court case that says there must be a reunion of the Yellowstone and Northern Continental bears and scientists are looking at the possible paths the bears might take. An influx of genetic diversity through breeding with bears from the Northern Continental bears could give the Yellowstone grizzly population greater resiliency to changing environmental conditions.

A noted grizzly bear scientist said "There were routes that were not obvious before we started, and a lot more alternatives than we thought initially," van Manen said. The predicted routes matched well with 21 verified sightings of grizzly bears outside their usual ranges, like the bear seen in the Big Belts this summer."

Note; the Big Belts are north of the Crazy Mountains and the Crazies are part of the corridor route to get to the Big Belts and bears could migrate through the Crazy Mountains to the AB front and connect with the Yellowstone grizzlies.

4. Wilderness is possible, look at the Gallatin Range and all the efforts that were made over decades and decades of efforts. The important point is not to trade away lands of critical importance to wildlife.

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 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.

Here's what the people of Montana will get. As many have said; rock and ice-not good year round wildlife habitat.

Sections 11, 13, 21 have on the Montana Cadastral 0 acres of forested land, but 1920 acres of ag land. Aerial photos of those sections follow.

AERAIL PHOTO Section 11 contained within attachment

AERAIL PHOTO Section 13 contained within attachment

AERAIL PHOTO Section 21 contained within attachment

Here is what Montanans will lose, sections 4 and 8. These two sections have 358 ag acres and 948 forested acres. These low elevation forested acres are the most valuable habitat for wildlife. I realize sections 4 and 8 show roads, but these could be managed, just like the cherry stem in the AB wilderness.

AERAIL PHOTO Section 4 contained within attachment

I realize that sections 4 and 8 are roaded, but I think those roads can be controlled and still be of wilderness quality, much like the cherry stem in the AB Wilderness.

AERAIL PHOTO Section 8 contained within attachment

5. Consolidation of checker boarded lands was successfully done in the Gallatin Range

6. States support protection of corridors as stated in the Western Governor's position statement

GOVERNORS' POLICY STATEMENT 6/2019

Western Governors believe that federal land management agencies should support state and tribal efforts to identify key wildlife migration corridors and habitat in the West and engage in early and substantive consultation with Governors prior to the promulgation of any policy pertaining to the management of wildlife corridors and habitat

For the above explained reasons and again listed below, I urge the Custer Gallatin Forest Service to take no action. I do not believe it is in the best interest of Montanans or wildlife.

These are legitimate reasons to say no action:

1. It is an important wildlife corridor
2. There is a bill in congress that states the importance of corridors
3. Biological connectivity for Grizzly
4. Consolidation of checker boarded lands was successfully done in the Gallatin Range
5. States support protection of corridors

Thank you for your consideration of a no action alternative.

Nancy Schultz