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Submitted via email to: mcerickson@fs.fed.us

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Subject: South Crazy Mountain Land Exchange

Dear Supervisor Erickson,

Since 1958, Montana Wilderness Association (MWA) has worked with communities to protect Montana's wilderness heritage, quiet beauty, and outdoor traditions, now and for future generations. As Montana's oldest state-based grassroots wilderness organization, we represent over 4,000 members, many of whom have a deep personal interest in protecting the Crazy Mountains. The first Wilderness Walk, led by our founders Ken and Florence Baldwin in 1960 was in the Crazy Mountains.

As the highest, largest and wildest of Montana's island ranges, the Crazy Mountains provide vital headwaters and refugia for plants, fish and wildlife. They are also described by leaders of the Crow Nation as one of the most culturally significant landscapes in their ancestral territory[mdash] especially the high peaks within the core of the Crazies. MWA has long advocated for pursuing land consolidation and designating the Crazy Mountains as wilderness in order to protect the outstanding natural and cultural values in the Crazy Mountains. It is for these reasons that we support the proposed South Crazy Mountain Land Exchange.

The checkerboard land ownership pattern makes the Crazy Mountains' unique values vulnerable. Private inholdings create challenges for public access, and for cohesive land management. It is imperative that the Forest Service pursue opportunities to consolidate the Crazy Mountains in addition to providing strong protective management for the public sections. This project is a step forward for consolidating land in the Crazies and protecting Rock and Smeller lakes from the type of private development we have witnessed at Twin Lakes.

We recognize the loss for public recreation that may come with trading some of the low elevation sections to private ownership. However, the conservation easements that will be placed on these sections will provide protections for wildlife habitat, and the consolidation of federal ownership over the checker-boarded landscape in the core of the Crazies is in the best interest for future management of this wild island range.

### Section 3.2 Aquatic Resources

On page 16 of the EA the Forest Service asserts that Smeller and Rock Lake are "currently inaccessible" for public recreation. If this is truly the case, it is important to consider how this project could impact the water quality

in Rock Creek if there is a significant increase in motorized recreation on trail #270. One of the stated purposes of this project is to improve habitat for Yellowstone Cutthroat trout. MWA is concerned about the impact that increased motorized recreation will have on water quality and wildlife habitat. Trail maintenance should be performed to install any necessary water bars or other erosion management and mitigation structures as soon as possible. Impacts to fish and wildlife habitat should be monitored and considered in future evaluations of the appropriate recreation uses for trails #270 and #220.

### Section 3.5 Inventoried Roadless Areas

The EA states on page 9 that section 11 would become semi-primitive motorized (SPM). However, the IRA effects analysis on page 27 does not address section 11 when it concludes there would be negligible impact to the IRA. The analysis only considers the sections that would be designated as semi-primitive non-motorized (SPNM). It appears this is an oversight that ignores potential impacts from a SPM designation within a large block of roadless land.

I communicated with Lauren Oswald to clarify this point and she explained that section 11 will have a SPNM designation in the winter, and only a small portion of the section will be designated SPM in the summer to accommodate the existing motorized trail #270. This information should be clarified in the final EA. In the preliminary EA, it is unclear how much of section 11 will be SPM. Designating section 11 as SPM could have significant impacts to the surrounding roadless lands and should be analyzed further. MWA does not support a SPM designation within the core of the Crazies.

Ultimately, we would like to see the public motorized recreation to Rock Lake reconsidered in a site-specific analysis. Section 11 is deep within the core of the wild roadless Crazies, surrounded by alpine ecosystems and high quality mountain goat habitat. Much of the eastern Crazy Mountains are managed for primitive recreation and trail #270 and #220 should be managed consistently in order to preserve the wild character within the range.

### Conclusion

We appreciate the hard work and effort that the Forest Service has invested in this project to try and resolve access disputes in the Southern Crazies and consolidate public land. The Custer Gallatin National Forest encompasses some of the most unique and wild landscapes in North America, and we feel that the Crazy Mountains are among the most special on the Forest. In the past, the checkerboard land ownership has been cited as one of the primary hurdles for protecting the Crazy Mountains as Wilderness. This project helps to address that issue and consolidate a significant portion of the southern part of the range. I would like to thank you and your staff for considering our comments on this project.

Emily Cleveland Senior Field Director