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First name: Brad

Last name: Wilson

Organization: Friends of the Crazy Mountains

Title:

Comments: Dear Objection Reviewing Officer:

As a preliminary matter, the name of the proposed project is: South Crazy Mountain Land Exchange; the name and title of the Responsible Official is: Mary Erickson, Forest Supervisor; and the name of the National Forest and/or Ranger District is: Custer Gallatin National Forest/Yellowstone Ranger District.

As Founder of Friends of the Crazy Mountains, I object to the draft decision notice advancing the Rock Creek Ranch (RCR) and Wild Eagle Mountain Ranch (WEMR) components of the South Crazy Mountain Land Exchange. As a threshold issue, the Forest Service informed the public the South Crazy Mountain Land Exchange was a package deal between three separate entities that must advance simultaneously, or not at all. As such, because the Crazy Mountain Ranch (CMR) component is not advancing, the land exchange with RCR and WEMR should not advance. Further, the Environmental Assessment (EA) covers all three components of the land exchange (CMR, RCR, WEMR), while the Finding of No Significant Impact (FNSI) covers two components (RCR, WEMR). The disconnect between these two documents serves to confuse the public.

The above being said:

* No. 7 of the FNSI states as follows: There are currently no proposed projects that are considered reasonably foreseeable future actions. This is not accurate. The Yellowstone Club, through its consultant, was appointed by the Forest Service to help negotiate a plan for east side Crazy Mountain access issues in exchange for consideration of a land swap to increase the Club's private skiing terrain. In support thereof, please see attached my August 27, 2020 Guest Column, Historical trail rights must be part of Crazy Mountains solution, which appeared in statewide newspapers regarding the same.

* Section 3.6 of the EA mentions an old water ditch that has historical value, but ignores the 100+-year-old historic Crazy Mountain Trail System in its totality. This renders the EA as deficient. These trails have been part of the National Forest Trail System for over a century and enabled the Forest Service to begin its job of managing National Forest lands. I raised the issue of historic trails in my prior comment.

* Section 3.1 of the EA discusses access; however, the Forest Service ignores easements stated in the Northern Pacific Deeds and prescriptive easements over many years of agency maintenance and public use. Why has the Forest Service abandoned its policy of defending Forest Service trails that we have had for over a century? I raised this issue of access in my prior comment.

* Page 9 of the EA discusses water rights. Currently, all water rights are going through the statewide adjudication process by the Montana Water Court and/or the Department of Natural Resources (DNRC). At this point, the outcome of many water rights is uncertain. I raised the issue of water rights in my prior comment.

* Page 9 of the EA discusses mineral rights as it relates to the WEMR component. At this point, there is too much uncertainty as to whether WEMR can acquire the outstanding mineral interest in Section 1, T2N, R11E. The due diligence by WEMR should have been completed prior to a draft decision being noticed. I raised the issue of mining claims in my prior comment.

I object to the South Crazy Mountain Land Exchange for the reasons stated above and, because of the lack of transparency, for other reasons unknown to me.

Thank you for your consideration.

Respectfully submitted,

/s/ Brad Wilson