

Data Submitted (UTC 11): 12/19/2022 7:00:00 AM

First name: Kevin

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Organization: American Whitewater

Title: National Stewardship Director

Comments: December 19, 2022 Re: East Crazy Inspiration Divide Land Exchange EA To whom it may concern, American Whitewater is a national non-profit 501(c)(3) river conservation organization founded in 1954. We have over 7,000 members and 80 local-based affiliate clubs, representing approximately 80,000 whitewater paddlers across the nation. American Whitewater's mission is to protect and restore America's whitewater rivers and to enhance opportunities to enjoy them safely. We have ample membership in Montana, including in the project vicinity. The proposed land exchange would affect two whitewater runs of the highest quality: Big Timber Creek and Sweet Grass Creek. We raised the potential impacts of the proposed exchange on whitewater paddlers earlier in this process, and are disappointed to see no mention of paddling nor any analysis of paddling impacts in the EA. We ask that the Forest Service remedy this analysis gap. Big Timber Creek Big Timber Creek offers whitewater paddlers a spectacular and unique recreational opportunity of international fame. Paddlers hike up the trail from the trailhead and descend to the campground over a series of high quality slides, falls, and rapids. Big Timber has graced many paddling magazines, books, and films. The Forest Service is proposing to trade away a partial section that crosses the Creek and the road below the takeout but indicates that the Agency holds the easements required to protect access to the Campground, the trail, and the Creek. As far as we can tell, we see no anticipated change to paddling opportunities on Big Timber Creek associated with the land exchange given the EA's assertion that road and trail ownership and/or easements exist. We ask that the Forest Service confirm this is indeed the case, and that there is no anticipated effect on paddling Big Timber Creek as part of the proposed exchange. Sweet Grass Creek Sweet Grass Creek is an exemplary whitewater adventure that currently requires a 5-10 mile hike to enjoy. The FS proposes to trade away the two sections of public land on Sweet Grass Creek, both of which are downstream of the whitewater run, and give up long-standing but unresolved access claims to Rein Lane, Billy Creek Road, and the Sweet Grass Trail. In exchange, the USFS will receive 3-4 Sections up Sweet Grass Creek valley that will help protect scenery and trail access. While we are profoundly thankful for the public access provided by landowners and the Forest Service in the Sweet Grass Valley over the years, for the purposes of this project we have to assume - based on the design of the exchange - that access will not be allowed or certainly is not assured in the future. The EA states that the owners intend to continue to allow sign-in-permission-based seasonal access but offers no guarantees. Assuming access via Rein Lane and the Sweet Grass Trail is lost, the public will solely have access to the whitewater run roughly 20 miles into the 40-mile loop Sweet Trunk Trail. Paddlers would have to hike 20 miles back to the trailhead after paddling, or paddle out many miles to a public road which may necessitate hiking in the riverbed due to low flows. Paddlers are among the members of the public who need to carry very heavy things across public lands to enjoy their activity, not unlike big game hunters. A kayaking kit weighs roughly 70 awkward pounds without any overnight gear. With this in mind, it should be obvious that the difference between a 5-mile hike, a 10-mile hike, and a 20-mile hike is significant and often prohibitive for many paddlers. For the vast majority of the paddling community, the proposed land exchange is likely to foreclose paddling on Sweet Grass Creek. Consider Impacts on Paddling First and foremost we ask that the effects of the proposed land exchange on whitewater paddling be fully and transparently considered in the final EA, and in this process more generally. We describe the paddling resources, use, and anticipated impacts of the proposal above. We expect that the proposed land exchange will verge on existential for paddling Sweet Grass Creek, and that impact in particular needs due consideration and mitigation. The EA currently is silent on whitewater paddling. Secure Sweet Grass Access The proposed land exchange unreasonably curtails public access to the Sweet Grass Valley. We believe that at the very least, the Forest Service should negotiate public vehicular access on Rein Lane to the Sweet Grass Trailhead and public hiking access up the Sweet Grass Trail as part of this exchange. Rather than resolve public access in this area with the proposed land exchange, the US Forest Service is simply conceding it, to the point of even trading public land away without retaining public access easements. Far less preferable, but better than the current Agency proposal, would be to secure access to the proposed Sweet Trunk Trail via Billy Creek Road. Billy Creek Road access would avoid the main Sweet Grass Valley and cut the 20 mile hike into Sweet Grass Creek in half, and

offer additional entry points for the 40-mile loop. This would shorten the hike into Sweet Grass Creek for paddling and other uses compared to the proposed trailhead on Big Timber Creek, but would be longer and pose egress issues compared to the far more preferable existing Rein Lane approach to the Sweet Grass Trail. Conclusions We ask that the Forest Service re-envision this project with the goal of improving public access to the Crazy Mountains, and that it fully considers the effects of the proposed project on whitewater paddling. We are not opposed to land exchanges, but this one needs work before the public interest in accessible public lands and waters is met. Sincerely, Kevin R. Colburn National Stewardship Director PO Box 1540 Cullowhee, NC 28806 828-712-4825 kevin@americanwhitewater.org