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Comments: Attached please find my comments on the proposed East Crazy Mountain Land Exchange. Thank you for considering these recommendations.

I am 32-year resident of Livingston, Montana, and an avid outdoor recreationist who has hiked and hunted extensively in the Crazy Mountains. I have also had a fifty-year career in conservation/natural resource management/sustainable development. I deeply appreciate the opportunity to comment on the USFS East Crazy Mountains Land Exchange.

The Crazies, while an island range, do not stand alone or apart, nor are they simply a backyard playground waiting to be divvied up for human uses. Prominent scientists see them as an important bellwether and symbol, fodder in the growing national discussion about saving wild nature for this and future generations, and a key linkage in connecting wildlands to the north and south. They rank among the last and best of what makes the West great. A big part of that is the caliber of wildlife that call this wild landscape home.

Because of the potential and significant positive and negative impacts of the Custer Gallatin's proposed action, I strongly recommend that nothing less than an in depth and comprehensive Environmental Impact Statement be completed before a decision is made on project implementation. This EIS should address both the site-specific impacts of proposed actions, as well as their cumulative effects. And it should reflect a deep understanding of not only the current state of the Crazy Mountains such as ecological condition and recreational use levels, but also projected future conditions related to concerns such as climate change, increased recreational use, and development on adjoining lands.

Of special concern are actions related to facilitating increased recreational activities and infrastructure in the Crazies. There is a growing body of scientific research on the diverse and significant environmental impacts of outdoor recreation on wildlife and wildland character. For example, the Teddy Roosevelt Conservation Partnership has just released a study that found that 40% of Colorado's critical elk habitat has been negatively affected by recreational trail use. These potential impacts seem to be totally ignored in existing CGNF documents associated with this project. For example, USFS documents imply, that the proposed actions will "improve" ecological connectivity between wildlands to the north and south of the Crazies. One only need look at the neighboring Bridger Range to see a glaring example of where ecological connectivity has been all but severed by recreational activities and developments. Your plan calls for the construction of a new 22 mile trail (Trunk Trail 274). This is a major incursion into previously secure habitat. Based on recent research, this could have varied deleterious effects on wildlife. The Crazies are an island range, particularly susceptible to fragmentation. Yet these impacts are barely mentioned in existing USFS documents. In fact, the opposite is implied in regards to the project's impact on grizzly bears, wolverine and lynx, all species of great concern.

While the current plan touts the restriction of "motorized" recreation in sensitive areas and on newly created trails, that is something very different from restricting "mechanized" recreational use which could include both mountain bikes as well as e bikes. Both are proving to be of serious environmental and even social concern as conflicts between hikers/horsemen/runners with fast moving cyclists has become ubiquitous around the West. It is strongly recommended that any new trails reflect restrictions that would be required in designated Wilderness.

Below is a partial list of specific issues/questions related to recreational activities and developments associated

with this proposal that should be addressed in an EIS:

- * An accurate assessment of current recreational use (numbers/types) in the Crazies. If this does not exist, it needs to be completed.
- * An accurate assessment of the impact of these current uses that reflects an up to date understanding of recreational impact research from other analogous areas.
- * An assessment of both the site specific and cumulative impacts of proposed recreation related activities and infrastructure that reflects not just current, but also projected future recreational numbers and trends.
- * An assessment of the USFS ability to manage increase numbers of recreational users especially as new impacts from increased uses begin to emerge (for example, the illegal creation of new trails by mountain bikers [ndash] a common occurrence in other areas allowing mountain and e bike use).
- * An assessment of how future land use (such as development at the Crazy Mountain wildland-urban interface) as well as climate change, combined with increased trail development and recreational use numbers, will affect wildlife and wildland character.
- * Specific and serious assessment of recreational impacts on ecological connectivity and on specific species of concern such as grizzly bears, lynx and wolverine.

Until the scientific information is presented that clearly answers these questions, how can the public really have confidence in Forest Service assertions that the proposed action is of little consequence or impact?

In conclusion, it is clear, that a fully developed Environmental Impact Study on the effects of the proposed actions associated with this land exchange needs to be completed. This project potentially has significant positive ecological, social, and economic impacts. But it could also potentially have significant negative impacts. Without and EIS, it is impossible to know.

I hope that you will take these recommendations seriously. And again, I greatly appreciate the opportunity to comment.