Data Submitted (UTC 11): 12/19/2022 7:00:00 AM
First name: Kevin
Last name: Colburn
Organization: American Whitewater
Title: National Stewardship Director
Comments: December 19, 2022Re: East Crazy Inspiration Divide Land Exchange EATo whom it may concern,American Whitewater is a national non-profit 501(c)(3) river conservation organization foundedin 1954. We have over 7,000 members and 80 local-based affiliate clubs, representingapproximately 80,000 whitewater paddlers across the nation. American Whitewater's mission isto protect and restore America's whitewater rivers and to enhance opportunities to enjoy themsafely. We have ample membership in Montana, including in the project vicinity. The proposedland exchange would affect two whitewater runs of the highest quality: Big Timber Creek andSweet Grass Creek. We raised the potential impacts of the proposed exchange on whitewaterpaddlers earlier in this process, and are disappointed to see no mention of paddling nor anyanalysis of paddling impacts in the EA. We ask that the Forest Service remedy this analysisgap.Big Timber CreekBig Timber Creek offers whitewater paddlers a spectacular and unique recreational opportunityof international fame. Paddlers hike up the trail from the trailhead and descend to thecampground over a series of high quality slides, falls, and rapids. Big Timber has graced manypaddling magazines, books, and films.The Forest Service is proposing to trade away a partial section that crosses the Creek and theroad below the takeout but indicates that the Agency holds the easements required to protectaccess to the Campground, the trail, and the Creek. As far as we can tell, we see no anticipatedchange to paddling opportunities on Big Timber Creek associated with the land exchange giventhe EA's assertion that road and trail ownership and/or easements exist. We ask that the ForestService confirm this is indeed the case, and that there is no anticipated effect on paddling BigTimber Creek as part of the proposed exchange.Sweet Grass CreekSweet Grass Creek is an exemplary whitewater adventure that currently requires a 5-10 milehike to enjoy. The FS proposes to trade away the two sections of public land on Sweet GrassCreek, both of which are downstream of the whitewater run, and give up long-standing butunresolved access claims to Rein Lane, Billy Creek Road, and the Sweet Grass Trail. Inexchange, the USFS will receive 3-4 Sections up Sweet Grass Creek valley that will helpprotect scenery and trail access.While we are profoundly thankful for the public access provided by landowners and the ForestService in the Sweet Grass Valley over the years, for the purposes of this project we have toassume - based on the design of the exchange - that access will not be allowed or certainly isnot assured in the future. The EA states that the owners intend to continue to allow sign-inpermission-based seasonal access but offers no guarantees. Assuming access via Rein Laneand the Sweet Grass Trail is lost, the public will solely have access to the whitewater runroughly 20 miles into the 40-mile loop Sweet Trunk Trail. Paddlers would have to hike 20 milesback to the trailhead after paddling, or paddle out many miles to a public road which maynecessitate hiking in the riverbed due to low flows.Paddlers are among the members of the public who need to carry very heavy things acrosspublic lands to enjoy their activity, not unlike big game hunters. A kayaking kit weighs roughly 70awkward pounds without any overnight gear. With this in mind, it should be obvious that thedifference between a 5-mile hike, a 10-mile hike, and a 20-mile hike is significant and oftenprohibitive for many paddlers. For the vast majority of the paddling community, the proposedland exchange is likely to foreclose paddling on Sweet Grass Creek.Consider Impacts on PaddlingFirst and foremost we ask that the effects of the proposed land exchange on whitewaterpaddling be fully and transparently considered in the final EA, and in this process moregenerally. We describe the paddling resources, use, and anticipated impacts of the proposalabove. We expect that the proposed land exchange will verge on existential for paddling SweetGrass Creek, and that impact in particular needs due consideration and mitigation. The EAcurrently is silent on whitewater paddling.Secure Sweet Grass AccessThe 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 onRein Lane to the Sweet Grass Trailhead and public hiking access up the Sweet Grass Trail aspart of this exchange. Rather than resolve public access in this area with the proposed landexchange, the US Forest Service is simply conceding it, to the point of even trading public landaway without retaining public access easements.Far less preferable, but better than the current Agency proposal, would be to secure access tothe proposed Sweet Trunk Trail via Billy Creek Road. Billy Creek Road access would avoid themain Sweet Grass Valley and cut the 20 mile hike into Sweet Grass Creek in half, and

offeradditional entry points for the 40-mile loop. This would shorten the hike into Sweet Grass Creekfor paddling and other uses compared to the proposed trailhead on Big Timber Creek, but wouldbe longer and pose egress issues compared to the far more preferable existing Rein Laneapproach to the Sweet Grass Trail.ConclusionsWe ask that the Forest Service re-envision this project with the goal of improving public accessto the Crazy Mountains, and that it fully considers the effects of the proposed project onwhitewater paddling. We are not opposed to land exchanges, but this one needs work beforethe public interest in accessible public lands and waters is met.Sincerely,Kevin R. ColburnNational Stewardship DirectorPO Box 1540Cullowhee, NC 28806828-712-4825kevin@americanwhitewater.org