

Data Submitted (UTC 11): 10/30/2019 3:53:42 PM

First name: Greg

Last name: Munther

Organization:

Title:

Comments: I worked with USFS land exchanges for my 32 years in the Forest Service, and was intensively involved in them as District Ranger for 10 years on the Lolo NF. Inherently the process is front end loaded.....negotiations between parties are worked out before the public is notified. This makes it very hard for the public to effect change in the proposal. The proposal to to use Section 4 and 8 to be traded for more rocks and ice has been the typical of such exchanges I have experienced. Simply the lower more productive USFS lands are typically intermingled with private lands, while the rocks and ice part of the landscape is typically dominated by NF lands. In efforts to consolidate, the USFS capitulates to losing more productive lower lands in favor of a solid block of USFS rocks and ice.

In this case this proposal apparently discounts that these sections 4 and 8 are legally accessible and are also very good elk habitat presently used by many public land hunters. This exchange needs to delete Section 4 and 8 from disposal and proceed with the remainder of the exchange. I also question whether the ecological and recreational values were considered when these lands were appraised.