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First name: Montana Trout Unlmtied

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Organization: Montana Trout Unlmtied

Title:

Comments: October 30, 2019

Mary Erickson

Forest Supervisor

Custer Gallatin National Forest

10 E Babcock, P.O. Box 130

Bozeman, MT 59715

RE: Comments on the South Crazy Mountain Land Exchange Preliminary Environmental Assessment

Dear Ms. Erickson,

Please accept the following comments from Trout Unlimited (TU) and Montana Trout Unlimited (MTU) on the Preliminary Environmental Assessment for the South Crazy Mountain Land Exchange. We offer our comments after reviewing the documents and supportive information.

Trout Unlimited represents 300,000 members and supporters nationwide with 13 chapters and 4,500 members in Montana. Trout Unlimited is the nation's oldest coldwater fishery conservation organization with the mission to conserve, protect and restore coldwater fisheries and their watersheds. Additionally, TU is an active participant in regional land and fisheries management planning issues, both on and off the Forest.

Trout Unlimited supports land exchanges, between state/federal agencies and private landowners, that increase public access, create a large block of clearly identifiable consolidated lands for public use and benefit, and that secures, protects and enhances salmonid habitat and populations. While we support much of the South Crazy Mountain Land Exchange, we do not support the entire proposal as put forward. Specifically, we do not support the Crazy Mountain Ranch (CMR) component to exchange federal lands township 2 N., range 11 E., sections 4 and 8 totaling 1,305.58 acres for the CMR lands township 3 N., range 11 E., sections 11, 13 and 21 totaling 1,920 acres.

Federal sections 4 and 8 are excellent fish and wildlife habitat, sitting along Rock Creek and offering public hunting and fishing, and have easy, year-round walk-in access through Forest Service Trails 270 and 272 (pictured on page 3). The overlap of roughly 20 feet between the sections establishes a public access between the two sections. Additionally, there is already walk-in access, through private property with a conservation easement, to Rock Lake and Smeller Lake through Forest Service trail #270 and #220.

The section of Rock Creek in section 8 has been sampled by the state and found to have a healthy population of Yellowstone cutthroat trout (YCT). YCT are considered a Species of Special Concern by Montana Fish, Wildlife and Parks and a Sensitive Species by the Region 1 of the U.S. Forest Service. We believe in order to appropriately protect this sensitive population, it is best that both section 4 and 8 stay managed by the US Forest Service.

We understand how the checker boarded property ownership of the Crazy Mountains makes it difficult for the

Forest Service to manage and offer public access. However, we do not agree that exchanging sections 4 and 8 for CMR section 11, 13 and 21 enhances or benefits public access, or the protection of Rock Creek and the YCT population that live there. That being said, we do support the other proposed swaps in this proposal and thank the Forest Service for continuing to look for ways to increase access in the Crazy Mountains.

Sincerely,

Colin Cooney (Montana Field Representative), Trout Unlimited

David Brooks (Executive Director), Montana Trout Unlimited

Sharon Sweeney-Fee (Chair) Montana Council of Trout Unlimited