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Title:

Comments:

I am Founder of Friends of the Crazy Mountains, an organization dedicated to "lending a public hand to our public lands" and protecting public access to our public National Forest System lands in the Crazy Mountains. I was born and raised in the Livingston/Shields Valley area. My family has over 100 years of historic use on the public trail system in the Crazy Mountains. It is true the Crazy Mountains are a unique and ominous range, which has been my backyard for all my life. This huge land exchange is so very important to us all. The public cannot keep giving away historic pieces to greed and getting less in exchange. I support Alternative A - No Action.

As a threshold issue, the Forest Service did not carry out its responsibility for complying with the requirements of NEPA. Without science, the public cannot make an informed decision until the proper NEPA process is conducted. It's clear the implementation schedule is being fast-tracked and certain action items have been bypassed. While it is desirable to consolidate Federal land in the Crazy Mountains, the breadth of the proposed land exchanges warrant the Galt land exchange from 30 years ago be used as a model in this case.

The Crazy Mountain Ranch component is the "elephant in the room" and is not in the public interest. Here are a few examples for consideration: 1) The Forest Service proposes trading Sections 4 and 8 for Sections 11 and 13, T3R, R11E. Sections 4 and 8 are pristine, easy-to-access, low mountain sections which contain some of the best fair chase hunting opportunities for elk on public land. Sections 11 and 13 contain the alpine lakes, Rock Lake and Smeller Lake, respectively. Many years ago, there was a concrete irrigation dam and outlet tunnel mined under Rock Lake. It's possible there is no permit for this dam, which (as locals know) was breached around 2012. Did Crazy Mountain Ranch repair the breach? When was the last time the Forest Service conducted a field visit to Rock Lake? The dam's history should be made available for public scrutiny; 2) There are historic water rights on Rock Lake and its water will stay under the control of the Crazy Mountain Ranch, along with third-party irrigation water rights owned by other parties that will remain in private ownership. This is not a clean land exchange and will lead to future conflict. As Mark Twain is believed to have once said, "whiskey is for drinking, water is for fighting"; and 3) the Forest Service would be getting a number of mining rights in sections 11 and 13. Why is the Forest Service proposing trading good elk habitat for high elevation lands with a bunch of mining claims? A purchase could be justified, but not a land exchange. Has there been mining activity at these mine claims and if so, why is this information not available for us? Montanans are well aware of the ramifications of mining disasters and costs. These few examples beg the question, why would the Forest Service even consider these possible future risks?

Another point I would like to address is the obliteration and reroute of another portion of the historic Lowline Trail, which is also part of the land exchange with Crazy Mountain Ranch. Once again, why would the Forest Service consider this as the public already has access to sections 4 and 8, including an easement as stated in the October 25, 2019 update. The Forest Service ignores easements stated in the Northern Pacific Deeds and prescriptive easements over many years of agency maintenance and public use. Why is the Forest Service trading away lands that contain abundant wildlife for public access rights that already exist? The new reroute of trail 272 in this land exchange is going to attach to trail 270 starting in section 3 and running through sections 33-32 and reconnecting in section 31 to existing trail 272. This trail will be in steep country making it difficult to access. It seems the Forest Service has not thought through that we will be destroying wildlife habitat for a trail that already exists. Why?

In closing, the Crazy Mountains are a known Crow traditional cultural landscape. As such, the Forest Service recommendation to reroute a historic trail to a high elevation raises questions. The 2009 Record of Decision for the Gallatin National Forest Travel Management Plan is clear that the high peak areas of the Crazyies hold a

significant cultural value to the Crow Tribe that must be respected. And, the 2016 Custer Gallatin National Forest Assessment Report identifies the range as a Traditional Cultural Property District, and uses it as a representative example of culturally and historically significant property on the national forest. Earlier this year, tribal leaders and representatives asked "...the Forest Service to not expand mechanized and motorized travel in the Crazyes. We are also asking the agency to not allow mining, the building of any new roads, construction of any new energy or utility corridors, or development of any new recreation sites or facilities." Have these concerns been addressed by the Forest Service? If so, we would like to see the response.

Friends of the Crazy Mountains does not support these land exchanges, which are too risky. There is not enough information and too many unanswered questions in the short period of time we have had to digest it.

Respectfully submitted,  
Brad Wilson