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Comments: I support only Alternative A, No Action, for the reasons stated below. We need a comprehensive and resource-rich long-term plan for consolidating lands in the Crazies. The Crazies are too small a range to have boundary lands exchanged, and they will be harmed by this piecemeal approach.

The problem with the so-called checkerboard land ownership in the Crazies is not reducible, of course, to consolidating the land ownership alone. Many landowners would probably love to shed rock and ice sections of the Crazies for the lower timbered and meadowed sections, but the public would gain very little from such an exchange and lose much. So the problem is one of retaining the wild character and ecologically-sound quality of this mountain range for the public.

Ideally, the Crazy Mountains need Congressional Legislation. In the Montana Wilderness Bill of 1988, they were included as a "Land Consolidation Study" in this Bill that was passed by the U.S. Senate and US House of Representatives but later pocket vetoed by Pres. Reagan. Land Consolidation with a view to Legal Wilderness was the guiding intent of Congress, and it should be the direction for the consolidation now being pursued.

The Montana Wilderness Bill of 1988 states:

10/18/1988 S2751

Sec. 10. (a) (1) The Crazy Mountains Land Consolidation Study Area in Gallatin and Lewis and Clark National Forests, Montana, comprising approximately one hundred nine thousand five hundred acres, as generally depicted on a map entitled "Gallatin and Lewis And Clark Land Consolidation Study", dated October 1988, shall, notwithstanding any other provision of this Act, be managed in accordance with the provisions of Public Law 95-150. The Forest Service shall complete a study of public and private land consolidation alternatives for this area and shall transmit such study to the Committee on Interior and Insular Affairs of the United States House of Representatives and the Committee on Energy and Natural Resources of the United States Senate no later than January 1, 1991.

Without that overall mandate, the Forest Service should not attempt such consolidation except in cases where the value of the exchange is unquestionably good for the public and would be a step toward wilderness designation. Simply consolidating rock and ice is not in my view a step toward wilderness designation, for instance, because the canyons and foothills have much to do with the outstanding wild quality of the mountains as a whole and their ecological value, scenic value, and trail system value. So ideally Congressional legislation ought to be passed, comprehensive land consolidation options should be studied, and resources ought to be made available to enable consolidation, including possibly land exchanges involving the BLM lands.

In particular for these proposed land exchanges:

I don't see what the public really gains from the land exchange with the Crazy Mountain Ranch. The Crazy Mountain Ranch will retain water rights on Rock Lake reservoir. This is as much as the ranch really wants with this section anyway. So they get to eat their cake and have it to. I try not to go to Rock Lake at certain times of the year simply because when it is drained so low, the reservoir character becomes obvious and sand blows. Smeller Lake is a great place and it ought to be consolidated with public land eventually but for now it should not be exchanged for the land and the lower Rock Creek. That trailhead is one of my favorites, and it provides good access to area, including both Rock and Smeller Lakes. For those who are up to it, it also provides good access to off the trail backpacking to Crazy Lake and Pear lake as I have taken in the past. I understand as well the considerations for hunting and fishing and the uniquely valuable population of native cutthroat trout in the Forest Service sections to be traded, and of course their ecological value to the Crazies as a whole. For instance, I, like others, believe that a cabin, as allowed on the traded section, of unknown size, use, and placement could have a wide range of ecologically negative effects. So before proceeding with this exchange, I would like Congressional legislation and the mandate, comprehensive planning, and resources that that would bring.

I'm particularly interested in protecting traditional trails and building new trails in the Crazies. I think the low-line trails are especially important, as they could provide interesting loop trails from nearly all trailheads, as they do

with the Porcupine and Sunlight Lake trailheads (unless the Forest Service allows them to be logged). This would increase the value of the wilderness portals and make the Crazies more attractive to more backpackers for every trailhead in the Crazies. It would also disperse hikers. So when I see that a section of public land that is proposed to be traded that has a trail on it, I'm alarmed.

I am alarmed by the willingness of the Forest Service to dodge the elephant in the room. We have traditional easements to these trails and roads, as evidenced by the Forest Service construction of the trailhead at Rock Creek. I'm not a lawyer, but I suspect that there is much hidden in the language of the Environmental Assessment's phrases "permanent easement" and "apparent gap in the recorded easements." I suspect that an easement doesn't have to be "recorded" in order to be an easement. If that is the case, then without explicit reflection on what is taking place here no environmental assessment is complete. The public needs to know whether it's being duped. If we don't put our foot down and keep these traditional easements here and now, the public is going to be in for a great loss. It should be resisted strenuously, rather than rolling over and giving away our public access. The Forest Service should be fighting for the public here. The landowners have rights, to be sure, but so does the public and in this situation the public is losing what rightfully is theirs, and then, by FS word magic, seem to be "benefiting".

I'm not directly familiar with traditional trail #272, nor am I directly familiar with other Forest Service Sections which it crosses and yields access to. I do understand that it's important to other deer and elk hunters and trout anglers, and I support them. I also see from letters that it is important access to other FS sections. I do think we should avoid losing the only public land of section Rock Creek that supports genetically pure native Yellowstone cutthroat trout. So I think we should not abandon the traditional trail #272.

I find it odd that the Forest Service is blocking up Forest Service land with the proposed Wild Eagle land exchange and then only to checkerboard that land again with the proposed Rock Creek Ranch exchange. Thus, the proposed trade is in direct conflict with two of the Environmental Assessment's "anticipated benefits: "creating a large block of clearly identifiable consolidated, NFS lands for public use and benefit" and "consolidation of NSF lands, resulting in management efficiency."

Furthermore, in conflict with the same to "anticipated benefits," if section 8 (Wild Eagle) is traded, the landowners will have little incentive to sell or trade section 5 to the north of section 8, as would be needed for genuine consolidation. I would at least like to see this as an alternative fully studied for consideration, that is, trading section 8 for section 5. So I think both of these exchanges are questionable. It would be far better if we had a congressional mandate as I have said above which would make more resources and comprehensive planning possible.

These sections that would be traded to the Rock Creek ranch also provide good access for off trail hiking. I've backpacked from here over to Crazy Lake. It's actually very doable and can make an excellent loop back to the trailhead. So I would be reluctant to give these up.

Living in Billings and having to work Wednesday night, I could not attend the public meeting. I have briefly talked with the Livingston Ranger. And I have had a phone call into Dee Clossen this week, but she evidently is unable to connect with a return call. I understand that these are complex matters and I do wish I had a better handle on them, yet I still insist on the need for a comprehensive plan toward wilderness and more resources that can be called on for meeting the concerns of willing landowners. The more I study this particular proposed exchange the more problems I'm finding.