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Organization:

Title:

Comments: Sent: Tuesday, October 1, 2019 10:36:28 AM

Subject: A few comments on South Crazies Land swap process.

Hello Mary,

I'm concerned that the process for reviewing the southern Crazy Mountain land swap isn't enough to get informed comments on Sections 8 and 4. These sections are little known, in part because of the Forest Service's actions. In addition to containing outstanding wildlife habitat, very valuable mature Douglas fir and grazing opportunities, S8 is the only public land on Rock Creek that has a viable fishery. Actually it appears to be the only public land in the entire south Crazies that has a viable wild trout fishery.

Regarding wildlife habitat, a simple visit to these properties shows that they are extraordinary, yet the Forest Service seems to be minimizing the chances that people realize these lands have rock solid access and are public.

Right now signs direct the public AWAY from Trail 272 at the junction of Trail 270 and Road 199. Nowhere on trail 272/Road 199 is a single indication that Trail 272 exists, at least before Road 199 enters S8. (I entered S8 on Road 199 and didn't travel 272 beyond that point.) Without signs even a person seeing the trail on a map would probably not use it. Quite frankly I was nervous walking the trail and I knew for a fact that it had an easement. Why is the Forest Service not indicating this easement protected trail even exists? How can you get informed comments if nobody knows about it?

Also necessary for informed comment is to have signs indicating that the USFS is considering swapping these lands at the trailheads during the entire hunting season. This is impossible with only a 30 day comment period. Why are you not targeting the users during the period when they will use it?

Finally, the comment period has to be during a time period when interested people can evaluate the attributes of the lands under consideration, especially since the Forest Service has minimized

the chances that they knew its exceptional value beforehand. The fall is the worst time because hunting season takes up any free time the main users have. Furthermore, with snow already on the ground and days getting shorter most people aren't going to be able to spend the amount of time required to make informed comments. How can you have informed comments if you don't allow the lands under consideration to be fairly evaluated?

Regarding the fishery, again, S8 is the only public land on Rock Creek with fish in it, and likely the only public land wild trout fishery in the southern Crazy Mountains. On 9/13/2019 my wife (Ann) and I fished Rock Creek on S8 and found it to be a very good fishery. I averaged 1 fish every three minutes for the first 45 minutes. I stopped counting when I reached 28 fish. The fish were about a 50/50 mix of brook trout and native cutthroat.

While it is hard to believe, Rock Creek appears to be fishless on all public land upstream of S8. I have fished Rock Creek on the public land below Rock Lake twice and never saw any indication that there are fish in there. Scott Opitz, fisheries biologist for Montana FWP, looked at their records and when they shocked that section in the 2000s they found zero fish.

The upper reach might be barren because there is a two mile stretch of Rock Creek between S8 and the upstream public land that regularly goes dry. On 9/17/2019 I visited this section. It had running water, but I found no signs of aquatic life such as mayfly and stonefly nymphs or caddis larva.

The only other public water in the south Crazies with wild trout potential is Cottonwood Creek. My wife fished there 3-4 years ago and did not catch any fish. It is very rare for her to not catch fish so at minimum we can say it is a very poor fishery. Therefore S8 is the only public land in the South Crazies with a decent wild trout fishery, and perhaps the only public land with a wild trout fishery.

Regarding S4, I wasn't even aware that this was publicly accessible because the National Forest boundary on Forest Service map obscures the overlap. This is a very big deal as it doubles the amount of high quality land that is publicly accessible. Again, intentional or not, the Forest Service has obscured the accessibility of this land, drastically lowering the number of people who are familiar with this land.

Given the exceptional qualities of S8 and S4, including the rock solid access, it is very surprising the Forest Service is even considering swapping this for hatchery fisheries that are surrounded by talus, are twice the distance away, and require nearly 3000' in elevation gain to access. Because the access to these sections with very high recreational value has been obscured the land swap will look far better than it is. Therefore most of the comments you get will be uninformed.

Unfortunately, by putting these sections on the table you have put the people who have discovered them in the position of widely publicizing their unique qualities to save them. The increased awareness will increase usage and exacerbate the problem of elk leaving public land and significantly reduce their value.

Best regards,

rob Gregoire