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Comments: The proposed land exchange, while well intentioned, does not account for the disparity in quality in the lands exchanged. On its face, the proposal is qualitatively inequitable. It purports to exchange thousands of acres publicly held foothill and creek bottom lands (prime habitat for elk and other game species), for thousands of acres of privately owned, high elevation, difficult to traverse mountain country. While the Forest Service's desire to consolidate public inholdings in the Crazy Mountains is admirable, this proposal threatens to throw the proverbial baby out with the bathwater.

The proposal appears to adopt the fallacy that more lands automatically equates to better outcomes for the public. However, as demonstrated above, not all lands are the same. Some, like those the public will be giving up, are easier to traverse, prime game habitat, and more susceptible to commercial development. Others, like those the public will receive, have little to no recreational or commercial value - which is likely why the landowners are willing to give them up in the first place. Simply put, as drafted this is not a fair exchange. The lands the public will be giving up are precisely those which we should be protecting (or, at the very least, demanding much more for).