Data Submitted (UTC 11): 11/30/2022 8:17:29 PM
First name: George
Last name: Wuerthner
Organization:
Title:
Comments: I spent a little time getting familiar with the Crazy Mountain land exchange a couple of years ago but have not kept up with all the details since that time in any depth . So I don't know if my comments or concerns were rectified in the latest proposal.

It is worth noting that the proposed land trades on the east side of the Crazies are not ecological equals. The parcels in red are FS sections that will be given to private land ownership. The parcels in purple are private lands that will be traded to the FS.

It may appear that we (the public) are getting equal-value lands by acreage, but in terms of ecological value, they are not equal.

The public is trading away parcels on the fringe of the public land that is has a lot of aspen, grasslands and patches of conifer. I.e. some of the best wildlife habitat in the range, especially for wintering ungulates.

By contrast, the parcels being given to the FS are higher-elevation lands dominated by dense forests of lodgepole pine and Douglas fir. It is not nearly equal in ecological value to what the FS will trade away at lower elevations.

Plus, these sections tend to be steeper terrain, while the sections that will be traded to private landowners may be attractive for subdivisions or home site development.

I haven't had time to read the entire proposal, and I seem to recall that maybe there might be a stipulation in the trade agreement that precludes the development of the FS sections that are traded. If not, at a minimum, this should be part of the deal.

However, even if there can be no subdivisions, at the very least much of the FS sections traded to private landowners are likely to be logged (as has adjacent private sections). So their ecological viability would still be compromised.

Also, two sections of FS lands along Sweet Grass Creek are part of the land trade. This is a meadow and riparian habitat. Again some of the best wildlife habitat in the area.

If I could redesign the land trade, I would advocate that the federal government buy out the private sections and hold them in public hands.

I am pretty sure you are aware of these issues, but just wanted to emphasize that the public will not be getting lands of equal ecological value. Whether anything can be done about this at this late date, I do not know, but it is worth seeing if an alternative could be proposed like buying out the private checkerboard sections as was done in the Gallatin Range back in the 1990s.

Best: