Data Submitted (UTC 11): 12/12/2022 6:27:51 PM
First name: Robert
Last name: DeSoto
Organization:
Title:
Comments: The Crazy Mountains have been revered for their great beauty and bountiful game and fish for as long as humans have known of them. Unfortunately, they have also been a subject of conjecture and a case study on public land access for quite a long time as well. While the land swap may sound like a wonderful plan to the uninformed, the fact of the matter is that the land swap results in a net loss for anyone who recreates in these mountains. Other than the complete loss of the Sweet Grass Trail, a trail historically used for hunting access for years, I am very concerned about the bottlenecking of hunters and hikers to a single access on the proposed East Trunk Trail. The Crazies already have a surprisingly high concentration of hunters to few access sites as it is, reducing the access sites would be absolutely absurd. This would likely result in unqualified individuals being forced to trek much farther into the mountains than they normally would in search of game, which in turn would likely increase the number of emergency calls for rescue due to either getting lost or being injured. Doing so puts our first responders at an unnecessary higher risk. The upkeep of longer trails as opposed to multiple shorter trails is also exponentially higher, due to the increased time personnel are forced to trek into hard to reach areas to perform trail maintenance, which will have to be done more often due to the increased damage done to the trail by virtue of being the only access point in the area.

Secondly, the current PEA does not support the USFS in regards to mineral rights. The potential loss for the USFS in the current 100% of mineral rights traded for 18% of mineral rights would not even be discussed in a private land transaction. In fact, it would be laughed out of a conference room. State law is clear in regards to the dominance of mineral rights, and it is not a stretch to assume that the private entities that will be granted said rights will use the law to build roads, destroy forests, and otherwise scar these pristine mountains in order to take advantage of the mineral rights given to them in this completely one sided deal.

Next, we come to the lack of valuation of the timberlands lost during this exchange. It is suspicious, and dare I say a violation of federal law, that there has been an omission of the value of the timberlands that are being swapped for essentially unusable, barren rockslides. This could lead one to reasonably believe there is a certain amount of closed room dealing going one behind the scenes of this land swap.

Another faulty point of the PEA lies in the potentially false statement that it provides public benefit at all. All of the potential "benefits" are just that, potential. There have been no contracts made public to allow for the stated non-federal parties to provide all of the "potential" trails, maintenance, and parking lot improvements. As someone who has worked in the construction industry, I know the value of plans without contracts. They are worth nothing. There is also the statement that private entities will provide conservation easements and access for the Crow People to Crazy Peak. Once again, this statement is made with no contractual obligation for these nonfederal groups. Therefore, it is a false claim in the PEA to say the Crow will be allowed access, as there is nothing holding anyone to this claim. With the history of the federal government's treatment of Native Peoples in the past, it is fair to look at this claim with distrust.

As I continue going down the PEA, I notice another legal violation in the form of a net loss of wetlands in this land swap. The trade of 40 acres of federally owned wetland for 7.8 acres is a violation of Executive Order 12962, which states that there cannot be a net loss of wetlands in a land exchange. Doing simple math shows a net loss of 32.2 acres, making this swap as it stands, a violation of the law.

In a state that publicly prides itself on its public lands, this swap sets a dangerous precedent for future land exchanges. In essence, it is rewarding the anti-public access sentiment of new Montana landowners, and provides a swap they can point to for future deals that also favor the landowners over the public. This sentiment did not exist 40 years ago. It is time for landowners to pride themselves on being stewards of the land again, not

the modern sentiment that only the rich and powerful should be able to enjoy the land, and use it for profits and themselves. In regards to this ceding of power and land to private entities, the USFS is essentially telling anti-public land lobbies that they are willing to sign over all their powers to the landowners, instead of promoting their interests and the interests of the public. This is not the precedent the USFS should set for future deals.

Now we come to the habitat degradation of Sweet Grass Creek that will occur under the current plan. Fishing has long been one of the most popular activities in this area, and more people are picking up a rod for the first time every day. The USFS is directed to protect fishing habitat and promote increased fishing opportunities, however this plan would result in the opposite whilst not allowing for any habitat enrichment.

Lastly, this deal would result in the complete loss of two historically used trails, Sweet Grass Creek Road and Trail #122. This, in all honesty, is likely the whole reason this swap exists as the fight over these trails has been going on for 20 years, due to the malicious nature of the landowners who have fought tooth and nail to stop use of trails that have been used for far longer than they have been there. By removing these trails, the public is losing highly productive lowland elk and deer habitat access in return for useless and difficult to reach icy peaks and rockfalls. It is a completely one-sided deal, and I hope the USFS realizes its responsibility to the public good and qualitative data far outweighs the quantitative win that they will flaunt should the deal go through.

The East Crazies Land Swap must be opposed!