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Comments: The gun club that I belong to has brought up the following issues. They seem like reasonable issues and I would like to see those items addressed.

1) The PEA will minimize hunting recreation on Crazy Mountain public lands by reducing the number of access points in the mountain range. Instead, a 22-mile-long trail through remote lands will be substituted. This new trail will result in a net disruption to hunting opportunities through high traffic trail use. This is what happened on the west-side and will happen again on the east side. Ironically, the USFS science division supports this conclusion through publications but it is being dismissed at the administrative level during this process.

2) Fishing opportunities are eliminated by the PEA in the Sweet Grass drainage by trading away 2+ miles of creek bottom.

3) There are mineral rights issues with the land transfer. Simply put, only 18% of private mineral rights will be transferred into public holdings while 100% of public mineral rights will be transferred into private holdings. Montana law is very clear that mineral rights supersede surface rights. This becomes a serious concern in both the monetary value of the exchanged lands and in the possibility that the mineral holders would choose to exercise their rights and explore on lands the public is a surface owner. It's only prudent to require and even exchange.

4) Another omission of the PEA is it does not disclose the value of severed water rights. The PEA indicates that water rights will be transferred from federal to private holdings but does not disclose any value of that transfer. The public has a right to know these details.

5) There is no disclosure on the value of timberlands in the exchange. This is another omission in the PEA and the public has a legal right to see these numbers.

6) There is also no disclosure of the value of the land exchanged. The exchange of high producing lowlands for less producing highlands is not and equal exchange, even though a few more acres of private lands are being transferred into public holdings.

1) Finally, these types of proposals typically have multiple options, as was the case in the Crazy Mountain Southside lands exchange; however, the PEA proposes only two choices. (a) is to oppose the exchange and (b) is to accept the exchange. We feel the situation is much more complicated than a simple two choice solution and NEPA may require the USFS to do just that.

Based on these many omissions and lack of credible transparency, it is reasonable to believe the PEA is faulty, it is certainly misleading, and perhaps illegal. The process needs a reboot with more transparency and input from local people. Our club has taken a position in opposition to this PEA based on how it will impact the opportunity for our members and community.

Comments will be accepted until December 23rd, 2022. It is important to note that only those who comment now can comment further as this process proceeds. Another oddity of this land exchange.