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First name: Nancy Schultz

Last name: Anon

Organization: Gallatin Yellowstone Wilderness Alliance

Title:

Comments:

December 12, 2022

Attention:

Forest Supervisor: Mary Erickson

Custer Gallatin National Forest

P.O. Box 130

Bozeman, MT. 59771

Dear Mary Erickson:

\*Please REJECT this East Crazy Inspiration Divide Land Exchange #63115 - Alternative A - No Action

On November 9 of this year, the Custer Gallatin National Forest (CGNF) released public notice of a land exchange called the East Crazy Inspiration Divide Land Exchange. The preliminary environmental assessment was released simultaneously to disclose and document the possible environmental effects which could arise from the Proposed Action. The Proposed Action is committed to exchange approx. 4,135 acres of National Forest System (NFS) lands for approx. 6,430 acres of non-Federal lands located in the Crazy Mountains of southcentral Montana and the Madison Mountains of southwest Montana.

Checkerboarding and Consolidating Forest Service Lands

Consolidating checkerboarded Custer Gallatin National Forest lands has a long history. The most recent consolidation of size was done in the Madison, Gallatin and Bridger Ranges.

A bit of history, there was a huge checkerboard of land ownership in the Madison Range. Big Sky was starting to develop and wanted to solidify their land holdings many land swaps took place and now Big Sky is very big and developed, but still looking to expand. Last map count that I did shows 52 sections or 52 square miles as its footprint.

Aerial photos I took show the area is very developed. The area used to be a historic wildlife migration route through Big Sky and down Jack Creek into the Madison Valley winter range, but it is gone.

The same checkerboard pattern was in the Gallatin Range. With many land swaps the range was solidified because of "The Gallatin Range Consolidation and Protection Act of 1993". H.R.873 passed and it has been protected as a Wilderness Study Area until it got carved up in the Custer Gallatin Forest Plan that was made final in 2021.

Of note, many people worked hard to pass H.R. 873 and are very disappointed that the new plan takes it apart. This is an especially bad plan for wildlife. Also bad for wildlife is the first project under the new plan, South Plateau and the second South Otter.

So if I seem skeptical of this proposal it is because of a long history of swaps and trades that do not benefit wildlife or wild places. My skepticism is partly because of the origination of this effort seems to have been initiated by the Yellowstone Club for a self-serving reason. I don't see how these trades benefit wildlife or wild spaces. I saw what the Yellowstone Club and Big Sky have become and I don't want this for the Crazy Mountains that I love. Big Sky/Yellowstone Club tried to do it at Holland Lake but got put on hold because of errors/omissions. And to add to my skepticism, the Forest Service evaluated the project with a categorical

exclusion. The public rose up and said that area was too important, for wildlife and wilderness quality lands.

#### Wildlife Habitat and Connectivity

The Crazy Mountains are an important island range in south-central Montana, and there is scientific evidence indicating this island range plays a critical role in wildlife connectivity and habitat.

The listed grizzly is not there yet, but I hope soon. Groups are working to construct an underpass east of Livingston that will enable the grizzly to cross I90. Grizzlies are very reluctant to cross busy highways.

The listed Canada Lynx is present and the Crazy Mountains are moderately suitable habitat.

<http://fieldguide.mt.gov/speciesDetail.aspx?elcode=AMAJH03010>

Wolverines are in the area and the Crazies are suitable habitat for residential occupation. Figure 30 in the environmental impact statement shows them to be on both sides of the mountain range. According to the map they do not inhabit the ridges. More information is on the Montana Heritage site

Wolverine\_AMAJF0310\_20160914

Wildlife habitat should not be what I call rocks and ice, like around Smelter Lake. This is not habitat that is suitable year round. I wanted to ground truth my thoughts so I put a camera on Windy Pass in the Gallatin Range. 1000 photos were taken and this is what I found;

I placed the camera in the Windy Pass area on 9/5/2020. I collected the camera on 7/20/2021. Roughly 1000 pictures were taken. My goal was to see what wildlife utilized the area which is at 8600ft.

I viewed all of the shots and made the following monthly wildlife count.

September 2 deer

October 0

November 0

December 0

January 0

February 0

March 1 Fox on 3/31

April fox on 6 sightings

May fox on 9 sightings

June fox on 5 sightings, 2 bear cubs, 1 wolverine, 1 moose with calf, 11 elk

July 1-2022 deer, 7 elk, 1 fox

I concluded that many species of wildlife do not use high elevation habitat for year round habitation. A trade of low lands for high elevation areas is not a good trade for wildlife. I do not support trading the Sweet Grass drainage, this area is important for wildlife.

Wetlands and riparian areas are critical for wildlife. It is stated that private lands that are to be traded have 7.8 acres of wetlands, but public acres to be traded are 52.4 acres. It appears that acres of high wildlife value will be going into private ownership. This I do not support. The private lands could be used for private outfitting. One of the major persons in this trade already has an outfitting business.

On the east side of the Crazies the trades are not ecologically equal. Trading away parcels that have aspen, grasslands and patches of conifer, for parcels on the fringe is not equal.

I encourage the Forest Service to pursue a measure to buy the lands that are needed for access.

There is also a Supreme Court decision that said corner crossing is legal. I know it is being challenged in a civil

lawsuit, but I think it may likely hold, and that may take this back to the planning stage. I do not want to trade valuable public lands away, another Big Sky we do not need with the gated communities and leaving very little for public land owners.

Nancy Schultz

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