

Data Submitted (UTC 11): 12/19/2022 4:53:03 AM

First name: Michael

Last name: Enk

Organization:

Title:

Comments: As a frequent user of National Forest lands in Montana, I am strongly opposed to this land exchange (#63115). I fully endorse and personalize the critical comments of the Montana Chapter of Backcountry Hunters and Anglers which elucidate the unacceptable tradeoffs embodied in this proposed land exchange :

The proposal is severely imbalanced in favor of the private parties:

- 1) The public loses miles of fishable streams. This is unacceptable to me as a person who spends over 30 days a year fishing national forest streams.
- 2) The public trades high quality, low-land wildlife habitat for higher, steeper, less productive habitat. As development increases on surrounding private lands, many species of wildlife become more dependent on habitat provided by undeveloped public lands, especially at lower elevations. I place high value on viewing wildlife on these public lands.
- 3) The public loses hunting and angling opportunity (as acknowledged in the USFS's PEA). These opportunities are very important to me and I do not wish to relinquish them.
- 4) The public loses more water rights than it gains. The ongoing drought in Montana has shown us that these water rights are more important than ever for maintaining fisheries and other beneficial uses, both onsite and downstream.
- 5) The public gives up 100% of mineral rights and receives only 18% in return. As a public lands owner, I reject this disparity of values exchanged.
- 6) The public gives up two important and historic trails and four administrative roads in return for one trail. Again, this is an unacceptable tradeoff. The Forest Service is neglecting its public trust obligations with this proposal.
- 7) The public loses over 40 acres of wetlands. Acre for acre, wetlands and riparian areas are known to be disproportionately used by mammals, birds and amphibians much more so than are dryland habitats. Wetlands support unique and sensitive plant species as well. With the onset of a warmer drier climate in Montana, we cannot afford to lose wetlands on national forests.
- 8) Finally, there is no disclosure of land or timber value lost by the public. The Forest Service must evaluate and release this information. I am not convinced that this land exchange is in the public interest or that it offers significantly more benefit to the public than what it gives away to private landowners.