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Comments: The currently proposed ECIDLE is flawed and I oppose it as a born and raised Montanan.

After reviewing information about the proposal, I am surprised at what appears to be clear enrichment to out-of-state private interests at the expense of American citizens.

This consolidation proposal further restricts public access to public land and consolidates access to those same public lands from adjacent private property. Specifically affording these landowners (and likely future developers) access to the very same access point (Sweet Grass Creek) currently afforded the public through historic use and access. This will create immediate private property value and future Yellowstone Club-like development on the eastern front of the Crazyes.

The existing checkerboard arrangement is a remnant of the largest land give away in US history (46M acres to the Northern Pacific Railroad alone). All odd numbered sections for 40 miles on both sides of the railroad route were granted- which the railroad could use, sell or otherwise enrich and pay for railroad construction. The reason for the checker board arrangement was to prevent exactly what the ECIDLE proposal intends to do- restrict public access to land and overly enrich the private interests. One only has to look at a land ownership map east of the Crazy Mountains to see results of other checkerboard consolidation- leaving little to no public land (obvious in the Crazy Mountain Project slide deck).

While the ECIDLE proposal (developed by out of state interests with a glossy slideshow) provides financial gifts to private interests, it fails protect the interests of the American people. Specific public value that is lost in this proposal are:

- \*Public land access

- oPrivate access to public land that is severely restricted to the general public has value- review any land listing neighboring USFS property and recent civil suit in WY for asserted property value loss

- \*Mineral rights to the proposed new public sections.

- oWithout mineral rights transferring to the public, the properties remains at risk of mineral exploration and development- this degrades property value.

- oThere are mapped and designated mines in the Crazy Mountains already- this proposal takes no actions to prevent more.

- \*Water rights severed from public ownership

- oRemoving water rights from the public domain, reduces the publics current and future valuation. Climate change and development not only make these rights more valuable, but help protect already overuse of many Montana streams.

- \*Overall land valuation

- oThe private land consolidation, arrangement and creation of a new access trail by a developer clearly indicate an expected high rate of return on this investment. The public land exchanged to the private sector, particularly along Sweet Grass Creek is the most valuable land in the area (and the only public land on Sweet Grass Creek in the lower reach)

I request that the USFS exhibit leadership in what is certainly a challenging problem without enriching private landowners at public expense. And, although they too are part of the general public, they are but a small fraction of the 320M people who are public USFS land owners. Your responsibility lays with the broader public good today, tomorrow and long, long into the future. The ECIDLE proposal fails on all aspects- please perform you civic duty and be known for standing up for public forests.

The Crazy Mountain Access Project presents a confusing situation, one in which the landowners are victims citing the challenges of the checkerboard ownership. All of this fails to note that somewhere along the line the following entities willingly purchased the land with all of those real/perceived encumbrances. There was and is no confusion- they just don't like the deal and want to change it.

- Switchback Ranch
- Carroccia Family
- Ward and Parker
- Hailstone Ranch
- Billy Creek Ranch

Who knows, but it's likely they may have seen it as "extending" their property use onto the public land without actually owning it. And, the public also had historic access through public land to the public land. Whatever, the reason- it was ok then.

Today- It appears that Switchback Ranch has already taken action to limit public access by performing section corner lot line adjustments (in some manner previously supported by the US Government) on Section 31/05 and 33/03. (On a map, this is a clear indication of curtailing public access). Also, Switchback as part of the proposed deal also allows tribal members access to Crazy Peak. This is a good thing and it should not be lost on anyone the apparent self-interest of this proposal prompted this "good will".

The Carroccia Family and Ward and Parker with their property on Sweet Grass Creek will likely get a sweet deal by adding two miles of stream to their adjacent properties, while retaining inholdings on the west side of the mountains and access to public land both north and south from the creek.

Hailstone and Billy Creek Ranch both stand to gain tremendously from the Yellowstone Club "2" trail adjacent to their probable properties.

Should this proposal proceed to approval- it will be an epic and probably little noticed failure of the USFS to preserve, protect and enhance the value of national forest lands. But it will forever degrade those public lands for the benefit of what cannot be more than 0.0005% of the US population.

Under this proposal, the future of the Crazy Mountains will be one that includes a Yellowstone Club type development on the eastern front stretching from Big Timber Creek to Sweet Grass Creek (and 4 miles up Sweet Grass Creek). This will provide approximately 14 miles of exclusive access to the newly minted Yellowstone "2" trail less than a half mile from the National Forest Boundary at nearly all points. A trail which if used by the general public requires an 11 mile hike just to get to a historic public access point (effectively creating a private national forest). And, it's only a small leap to see a "west-side" consolidation or future restriction on the remaining inholdings. Those inholdings becoming additional private mountain retreats for Yellowstone Club "2". (the glossy slide deck can even be recycle the slide show for promotional purposes to sell their new properties)

The general public is the victim here- not the landowners. They knew, have known and know now what they purchased. Do not sacrifice the public for their individual dissatisfaction and fight for the public land you are entrusted to protect.