Data Submitted (UTC 11): 12/19/2022 5:14:09 PM First name: Phil Last name: Knight Organization: Montanans for Gallatin Wilderness Title:

Comments: I object to the East Crazy Inspiration Divide Land Exchange. This exchange would clearly benefit rich landowners at the expense of the public and the wildlife of the Crazy and Madison mountain ranges.

I have spent a lot of time in the Crazy Mountains, having worked 15 seasons at the18,000 acre Crazy Mountain Ranch on the west side of the range (which is now owned by the Yellowstone Club). I have also skied and hiked in many areas of the Crazies and have climbed Crazy Peak twice. I did winter surveys for wolverine and lynx in the Crazies in the early 2000s and have backpacked to several lakes in the range.

The legacy of the railroad land grants from the 1800s continues to be a nightmare. I do appreciate that the Forest Service is looking for ways to consolidate the public lands in the Crazies. But this should not be done in ways that will decrease public access and diminish wildlife habitat.

My wife and friends and I used to stay at the Porcupine Cabin on the west side and ski the Porcupine Lowline trail to get to great backcountry skiing in Elk Creek. But one year we set out on the Lowline only to find that a private landowner had built a big fence across the trail and posted it against trespassing. It was aggravating and disappointing that historic access had been destroyed and that we could no longer get to Elk Creek. Now you want to do similar things on the East side.

I strongly object to the Forest Service relinquishing the historic public access of the Sweet Grass Trail. Shutting out the public is a terrible way to manage public lands. This can only exacerbate tensions between local residents and rich landowners like the Yellowstone Club. It will also increase pressure on the Big Timber Creek access and guarantee crowding at this trailhead and Half Moon Campground and at backcountry lakes in the area.

Eliminating the public access to Sweet Grass Creek would also cut off the best route for hikers, horseback riders and skiers to traverse the Crazy Mountains, from Trespass Creek via Campfire Lake. This is the most direct route across the range. Cutting off this route would diminish public opportunities for adventure, solitude and challenge in the Crazy Mountains. I have hiked Trespass Creek to Campfire Lake and back and it is an excellent and spectacular route. I always wanted to complete the traverse. Now you want to take that away.

I object to trading lower elevation, wildlife-rich sections on the East side of the Crazies for higher elevation lands. Private ownership of what are now public sections with rich wildlife habitat will play into the hands of the wealthy owners who want private hunting access to target the best wildlife for them and their hunting buddies. Moose, elk, wolves, lynx and many other species depend on these lands and would suffer from changes in management. Trading away the best wildlife habit to rich landowners plays right into the hands of the Gianforte Administration in Montana who want to privatize public lands, public wildlife and fishing access to rivers. The upper elevation lands of the Crazies, while scenically stunning and great for backpackers and peak baggers, are poor wildlife habitat unless it be a goat or wolverine. These upper elevation sections should be purchased outright by the federal government instead of sacrificing import land in the Crazies and Madisons.

I remember the Gallatin Land Exchanges which consolidated public lands in the Gallatin Range but resulted in a lot of problems elsewhere including the massive development underway at Big Sky and Yellowstone Club and Spanish Peaks, as well as logging and roadbuilding in the Bridgers Range in formerly roadless lands and a massive privatization of former public lands in the Bangtail Mountains. Please don't continue that awful legacy with this new exchange.

The Crazy Mountains are an important part of a network of wildlife corridors stretching from Yellowstone to Glacier National Park and beyond. If we are to reestablish wildlife connectivity for grizzly bears, elk and other wide-ranging animal species, we need to maintain the quality of the best wildlife habitat in these corridors. The Crazies are part of a corridor stretching from the Absaroka Range though the Crazies and into the Little Belt and Big Belt mountains. Wildlife traveling this corridor will need the lower-elevation lands rather than the high elevation sections.

I also object to giving up 52 acres of wetlands in this exchange while only receiving 7.8 acres, resulting in a net loss of public wetlands, some of the best, richest and most interesting wildlife habitat, used by most of not all species of wildlife in the Crazy Mountains.

The whole process of this land exchange is flawed. Tying an already complex exchange in the Crazies to another exchange desired by the Yellowstone Club in the Madison Range makes this exchange unnecessarily complicated. The Yellowstone Club has plenty of ski terrain already at their obnoxious private ski report just south of Big Sky. The slopes of Pioneer Mountain are already pretty much empty since not many people can afford to live and ski there. Why do they need more? How much is enough? The Yellowstone Club tried a few years ago to get a heli-skiing permit for the Centennial Range on the Idaho-Montana border but thankfully their proposal was rejected by the Forest Service due to potential impacts on denning grizzly bears. Clearly the Yellowstone Club cares only about catering to their rich members and would love to turn all of Montana into their private playground. If we give them these lands in the Crazies and the Madisons will they be satisfied? I doubt it.

The Crazy Mountains are traditionally viewed as a refuge for wolverine (Gulo gulo), a rare and elusive animal currently being considered for listing under the Endangered Species Act. While the actual status of wolverine in the Crazies is unclear, no action should proceed that would imperil what may be an important remnant population of wolverine in the Crazies.

Overall this is a poorly though through proposal which has been corrupted by back-room dealings between the Yellowstone Club and the Forest Service. Let's reject this proposal and start a transparent process to come up with a better one.