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Comments: I oppose the East Crazy Inspiration Divide Land Exchange. I want to thank the Forest Service and others involved in making an effort to find a solution to the access and consolidation issues in the Crazy Mountains. Unfortunately, it isn't ultimately the deal we should settle for, and I'll elaborate on why I oppose this effort below.

1. The two areas (Big Sky area and East Crazy Mountains) involved in the exchange should be separated. The two, together, are too large for the scope of a single Environmental Assessment. It's clear from the public comments made on this proposal that most people and organizations are commenting on one area or another. It's difficult to weigh the pros and cons of each area against each other, especially when most people commenting know one area or the other, but usually not both. There was not enough study of the impacts of each of these exchanges, and they need to be presented separately. This land exchange (as stated in the official documents) has intertwined a land exchange in the Big Sky area (involving the Yellowstone Club, specifically) with this larger one in the Crazy Mountains. This happened because our National Forest leadership made clear that the Crazy Mountains are a priority for exchanges, so interests in Big Sky worked to move the Crazy Mountain Exchange forward along with an exchange in Big Sky. These two areas are over 100 miles apart and in different mountain ranges.

The Forest Service seems to be facing a conflict of interest, and even if there isn't a COI, just the appearance of one should be reason to separate the proposals. The risk of undermining the public's trust in the Forest Service (and with it, other land management agencies) isn't worth proceeding with the exchange.

Executive Order 12674 (April 12, 1989), which Federal ethics standards are described in, provides: "Public service is a public trust, requiring employees to place loyalty to the Constitution, the laws, and ethical principles above private gain."

2. The EA should offer more than 2 alternatives. This proposal doesn't offer the public enough choices. If the two exchange areas can't be presented in separate EAs, the USFS should at least offer more alternatives beyond "action" or "no action."

3. The swap abandons disputed Forest access points, which the Forest is currently working to secure. This goes against the public interest, as well as the Forest's interest (and current travel plan).

4. It results in the loss of two important and historic trails and four administrative roads in return for one new trail. Notably, the trails we lose are much more accessible to more people with different abilities than the one trail we'd gain.

5. The public trades high quality, low elevation wildlife habitat for higher elevation, steeper, and probably less productive habitat. Elk and deer habitat is primarily in the sections we'll give up, and not as much in the high elevation sections.

6. The public loses hunting and angling opportunity (as acknowledged in the USFS's PEA). The public loses miles of fishable streams

7. We may abandon future access opportunity (corner crossing). If we advance this proposal before the nation, or the State of Montana resolves the legality of corner crossing (stepping across a corner from public to public, crossing a small airspace over private land) we may be giving up lands future generations may have been able to visit. I don't care if I never get to see some of these blocks of land, but I'm willing to protect them so others may possibly enjoy them in the future.

The issue of the loss of valuable wildlife and plant habitat is the most important to me in this swap. I would like to go here someday, but even if I never do, I want it to be protected for our wildlife species. We would be losing the low elevation, much more gentle terrain covered by grass and coniferous forests, riparian areas, and the lower reaches of Sweetgrass Creek, in exchange for very steep, rocky lands.

-The lands we lose are much more attractive to developers than the scree fields and mountainsides we'd receive. If we want to curb development, keep the lowlands, and know that it will remain difficult to develop the high elevation, even as private lands (mining can happen up there whether or not this exchange occurs).

-Without requiring a conservation easement and/or deed restriction to prevent development, there is absolutely no guarantee the landowners won't someday develop this land. -The public loses over 40 acres of wetlands, and water rights. -The public gives 100% of mineral rights and receives only 18% in return. This is concerning because the landowners will retain mineral rights up high, which means they could still use those rights (in other words, mining) in the future, on what would become USFS land, and as currently written, we can't stop it from happening.

-The PEA does not disclose the value of land or timber value lost by the public. These low sections we stand to lose contain stands of Douglas-fir and other tree species of timber value. This adds to the benefit of the landowners involved in this exchange, and is another place where the public gets shorted.

Suggestions to the Forest Service for a better proposal:

-A full EIS (Environmental Impact Statement) is warranted. A number of issues weren't thoroughly considered.

-Include more alternatives, not just "action" and "no action", such as the opportunity for the Forest Service to purchase some of these high elevation lands, rather than exchange them.

-Separate the Big Sky (Inspiration Divide) portion from the Crazy Mountain exchange. Present them for comment, separately.

-Consider building the trail without the exchange taking place. There are alternative route options.

-Deed-restrictions, or conservation easements, to preclude all mineral development and mining, as well as preclude industrial, commercial and residential development should be placed on lands conveyed from public to private ownership. This should be a condition of closing the land exchange like it was in the South Crazy Mountains Land Exchange.

-The Forest Service should reserve public and administrative access on sections 7, 8 and 10 in Sweetgrass drainage to maintain the status quo.

-The Crazy Mountains are native lands. Several Indigenous Peoples, including but not limited to the Crow, Salish, Cheyenne, Sioux, and Blackfeet have been historically and are still connected to this landscape, so engagement, consultation and co-management should include all regional Indigenous nations that identify as being connected.

-The public needs another opportunity for engagement once the environmental analysis is complete.

-The impacts of the land exchange and a new trail through previously unfragmented land should be thoroughly analyzed with a full Environmental Impact Statement.

In summary, the Forest Service is in the posterity business. Today's decisions and stewardship practices should be ones that future generations will appreciate. This proposal does not benefit the public as much as it should. This proposal yields a net loss in public access, and loss of habitat, in exchange for the benefit of a small number of influential, and/or extremely wealthy individuals. The legacy of an administrator, or the dedicated work of a group of concerned and committed citizens is not reason enough to proceed with this proposal that doesn't deliver for the 333,300,000 American public land owners.

Thank you for your time.

-Danielle