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Comments: USFS:

This is to provide comment on the proposed land-exchange proposal, #63115.

I would prefer out-right purchase of the private checkerboard inholding properties in the south Crazies to add to the public-lands inventory - our Congressional delegation should be enlisted to initiate and fund that effort. In general, I support long-term land-consolidation efforts in the Crazies, and continued pursuit of the acquisition of these inholdings, to add to our public-land inventory.

Providing larger areas for the support of less-common wildlife species such as mountain goat and wolverine, and species under habitat threat like pika (which require a high-altitude, cold environment), is a laudable component of the proposal. However, the threat of development on traded parcels, or remaining inholdings, is a potential threat to wildlife well-being in general. The integrity and protection of headwaters, which all species depend on, as well as lower-elevation demands such as livestock operations, needs to be an integral part of any plans. Thus, any parcels traded to the public trust should include the mineral and water-rights for those parcels, and properties traded out of public ownership should include conservation easements to prohibit commercial developments - the Crazies could easily become another 'Yellowstone Club' development, given the shifts in land ownership that have occurred there in recent years.

The issues regarding access to public lands in the Crazies seem to be getting more challenging with time, not less, so improvements in that arena should also be pursued. USFS should not relinquish access claims (such as in Sweetgrass Creek), pending the unsettled law regarding this issue, and the precedent-setting importance attached to such an action.

In summary, I would support the exchange if modified as noted above, while I would prefer retaining public-ownership of the lands proposed for trade, and outright purchase of (all) the privately-held roadless inholdings into the public-lands inventory.

The ills of the railroad land-grant legacy are many (for all parties), and it is very unfortunate there was not earlier foresight to acquire the roadless inholdings into the public-lands inventory before the present changes to land-values and ownership trends occurred. Efforts should be continued to add to the public-lands roadless inventory in the Crazies, preferably to the proposed RWA portion. Thus, regardless of the final disposition of this proposed land exchange, USFS should continue with efforts to achieve these goals.

Thank you.