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Title:

Comments: I would like to express opposition to the proposed East Crazy Mountains Land Exchange. In my opinion, the land gained is of lesser value compared to the land traded away. In addition, I have particular concern about the lack of conservation easements and lack of guarantee of continued public access. I believe forgoing the public access claims on the East Trunk and Sweetgrass trails is not in the best interest of the public.

Here are some additional specific objections:

- 1. The public forever loses rightful claim up Sweet Grass Creek Road and Trail #122
- a. The current Travel Plan designated the Sweet Grass Trail No. 122 as a public, non-motorized and non-mechanized trail. It is currently managed from the west to T. 4 N., R. 12 E., Section 8, as a Trail Class 3 trail for foot and stock use. The UFS determined that the access to the area was "inadequate" and thus, included in its Travel Plan the need and desire to "Perfect trail access across private in-holdings within Sweet Grass..."
- b. The PEA, however, ignores the goals set forth in the Travel Plan and does not reserve Sweet Grass Trail No. 122 for administrative or public use. This is in direct conflict with Forest Services' own objectives and would forever relinquish a public access point in the Crazy Mountains. 13. The public trades low-lying and highly productive and diverse wildlife habitat for steeper and higher elevation rock and ice. Particularly for elk hunters, this is concerning because of the reduction in quality elk hunting opportunities this will create.
- 2. The PEA violates the current Travel Plan.
- a. The PEA creates a net loss to public recreation opportunities and a reduction of existing public access points to the Crazies.
- b. The PEA eliminates existing hunting and fishing opportunities, and overall alters the nature and scope of existing recreational opportunities in the Sweet Grass drainage.
- c. The PEA contemplates relinquishing three (3) historically used public access trails and four (4) administrative roads to private ownership; this directly violates current Travel Plan objectives.
- 3. Also of concern, the proposal does not come with any commitment by the parties to put conservation easements on public lands traded into private ownership something that previous land exchanges in the Crazy Mountains have included. The South Crazy Mountain Land Exchange, finalized in January 2022, included voluntary conservation easements for public land sections going to private ownership as a component of the agreement. The easements provide for traditional land uses, including recreation, livestock grazing, and timber management but preclude all mineral development and mining, as well as residential, industrial, and commercial development (except for one recreational cabin). An alternative to voluntary conservation easements would be for the Forest Service to include covenants, easements, or other restrictions on the lands they convey. That way, the Forest Service could offer more guarantees to the public about the future use of the land.