

Data Submitted (UTC 11): 12/23/2022 1:55:35 AM

First name: Paul

Last name: Dinkins

Organization:

Title:

Comments: I oppose this massively inequitable land swap. The lower elevation public land that the USFS would give up is of incalculably greater monetary value in terms of development potential, mineral rights, hunting outfitting, etc. than the relatively inaccessible high elevation land they stand to receive in exchange. Similarly, the land that would be lost is of greater recreational value to the public with historic access and trails that should be defended and maintained, not bartered away. It is concerning that the proposed swap does not include any commitments by private interests to put conservation easements on public lands traded into private ownership or guarantees to continue the farce of "permissive access" to public trails. Even if one assumes the brokers of this deal are operating in good faith, the swap is still severely imbalanced in favor of the involved private interests.

There is nothing "grass roots" about a deal brokered by an out-of-state private equity firm. I am skeptical of CrossHarbor/Yellowstone Club's facilitation of this land swap. In addition to their goals in the Madison range, they already have their claws deep into the Crazies. Their purchase of the 18,000 acre Marlboro Ranch and its conversion into a "by invitation only" club for the ultra wealthy portends a future of massive development in the southern end of the range. Likewise, some of the private land (Switchback Ranch) involved in the swap is owned by YC member David Leuschen, who has helicoptered in excavation equipment and permanent structures deep within the range and placed them within 150 yards of public land near both Upper Twin Lake and Cave Lake. Clearly the YC's motivations have nothing to do with maintaining the wild nature of the Crazies, or maintaining or increasing public access to public land.

This swap is a bad deal for the public, a great deal for a few private land owners, and a frightening precedent set with with the involvement of CrossHarbor Capital/The Yellowstone Club.