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Comments: Thank you for considering comment on the East Crazy Inspiration Divide Land Exchange. I have lived in southwest Montana since 1990 and have spent countless days in the Crazies, including in the Sweetgrass Creek area. The Crazies are a truly unique and special place, and I think there's wide agreement that this exchange must protect their wild and undeveloped character for future generations.

There are no easy solutions in the Crazies, and I appreciate the work of landowners and stakeholders like PCEC to explore common ground. I think it's important for these conversations to continue, as well as to keep in mind that these national forest lands are held in trust for all Americans and that the Forest Service has tools not available to a coalition seeking compromise.

We can and must do better than the current proposal. This exchange would have long-lasting and perhaps unexpected consequences. The Forest Service should take its time and do an EIS with additional public comment. It's clear that there are a lot of unanswered questions, gaps in analysis and emerging ideas at this stage.

My comments focus on three relatively simple changes that I think could help the exchange meet its stated goals and serve the public interest if the proposal advances.

#### DEED RESTRICTIONS ON ALL CONVEYED FEDERAL PARCELS

I think this is a "make or break" point. It was part of the deal for the South Crazy Mountains Land Exchange, with all landowners agreeing to conservation easements allowing one new recreational cabin and precluding all mineral, residential, commercial and industrial development. This is consistent with the forest plan and with traditional and ongoing land uses on the east side of the Crazies. Easements of this kind should be written into the deeds prior to exchange.

Same for reserving right of first refusal. The century-old boundary of this national forest means something; the land within should become public over time. With 60+ private sections south of the Shields River, land swaps alone are a losing proposition for consolidating the public land without unacceptably shrinking its total spread across the Crazies. The Forest Service needs every opportunity to buy the land. Writing this into the transferred deeds seems like a no-brainer.

#### PUBLIC EASEMENT RESERVATIONS FOR ROAD/TRAIL 122

I think a hard look reveals a compelling case that Sections 8 and 10 at Sweetgrass Creek shouldn't be exchanged because of their recreational and ecological value. In any alternatives that advance without retaining these parcels, the Forest Service should reserve public easements for road/trail 122 in the transferred deeds.

The best long-term solution at Sweetgrass Creek is secured access to a trailhead on national forest. That is certainly a reasonable goal considering the relative lack of ingress on the east side of the Crazies. We can't know the fate of these properties over time, only that change will occur. For whatever reason, 20, 50, or 100 years from now, a gate or two might swing open, and our kids or grandkids will praise our foresight in holding the final stretch. So much of the current conflict in the Crazies could have been prevented if people 100 years ago had done the same.

This shouldn't be a problem because the parties have agreed to keep the "status quo" at Sweetgrass. The status

quo includes public title to cross these sections. Additionally, as others have pointed out, in this preliminary EA the Forest Service is reserving easements at Big Timber Creek and Trail 468 in Big Sky ... but not at Sweetgrass. This would indeed seem to be "arbitrary and capricious."

Lastly, for the same reasons, as part of the exchange a public easement should be secured for the portion of trail 122 in Section 7, given the history of Forest Service trail maintenance to Eagle Park.

#### CRAZY PEAK

The pending private agreement for tribal access and a conservation easement on Section 7 containing Crazy Peak raises significant unanswered questions and potential for long-term complications. Instead, it seems to make sense for the Forest Service to acquire Section 7 rather than Parcel H (Section 33) in the exchange with Switchback Ranch.

The proposed Sweet Trunk Trail skirts the public land boundary or crosses onto private land in several locations, suggesting that acquiring Parcel H isn't necessary for the trail reroute. Parcel H is a rugged slope that wouldn't invite trespass off the trail. It is of much lesser recreational and cultural value than Section 7.

I support consultation with the Crow and other tribes and protection of Crazy Peak in recognition of Indigenous connection to the place. Crazy Peak remains a desirable destination as the highest peak in the Crazies, a unique perch at the top of this island range where one can have life-changing contact with the vastness of our Big Sky and Great Plains stretching to the horizon. Eventual wilderness designation would seem to offer much greater long-term protection than any private agreement. Section 7 touches corners with Parcel K (Smeller Lake) that's to be acquired with the exchange, allowing for further consolidation of public land that's contiguous to, and could be included in, the South Crazy Mountain Recommended Wilderness Area.

Please explore acquisition of Section 7 as a priority in a revised proposal.