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Comments: As a kid growing up in White Sulphur Springs and as a journalist, I have intently studied the Crazy Mountains in general and this proposed land exchange in particular, both on paper and on the ground. My conclusion: For landowners and the Yellowstone Club, this proposal is a great deal. For the public and for wildlife, this exchange would be worse than the status quo.

\* This proposal would swap low-elevation, ecologically-rich public lands for high-elevation private lands.

Proponents of this deal point out that the public gains more land than it gives away-but what kind of land are we talking about? I walked Sweet Grass Trail #122 multiple times to find out. The sections along Sweet Grass Creek that the public would lose (sections 8 and 10) are not only lovely but rich in wildlife, plant life and fish. From the fertile creek bottom, you can look up at the rocky, treeless ridges that private landowners would give up in exchange.

This low-lying, riparian land is the most vulnerable kind of habitat in the Greater Yellowstone Ecosystem. According to Montana State University ecologist Andy Hansen, 39-57% of it has already been developed, and in recent years the development pressure has become "just overwhelming." This deal would privatize more of this low-lying land and contains no measures to protect it from development. Some argue that the current landowners in the area have no intentions to develop. This could be true, but they likely won't own the land forever, and we have no guarantee that future owners will feel the same. For example, shortly after David Leuschen, an energy magnate and Yellowstone Club member, bought the old Van Cleve guest ranch in Big Timber canyon a few years ago, his company Switchback Ranch LLC began developing a private inholding near Twin Lakes in the heart of the Crazies, as I reported for Montana Free Press ("Private development in the Crazy Mountains sparks anxiety for wilderness advocates," 9/18/2019).

Proponents of the deal argue that it will consolidate public land but fail to explain why consolidation is inherently good. The land it would consolidate is overwhelmingly high-elevation, rocky, steep land that is already de facto wilderness-no one wants to build luxury housing on one of the Crazies' notoriously steep 9,000 foot ridges. Plenty of people want to build luxury housing along a creek like Sweet Grass. As it consolidates public land, this proposal would also consolidate a vast private corridor along Sweet Grass Creek and into the heart of the range, opening that drainage up to the serious threat that it will eventually be developed into luxury houses and vacation "cabins" for rich customers.

I also have serious concerns about how the dollar values of the lands involved in this swap have been calculated. The Federal Lands Policy and Management Act requires that land exchanges swap lands of equal value, but this preliminary environmental assessment does not include the assessed land values. Now, I'm no real estate agent (thank heavens) but one doesn't need to be to know that, in the current Montana land rush, the dollar value of waterfront property along a trout stream like Sweet Grass is approaching infinity.

\* This proposal hurts public access to Sweet Grass Creek

Sweet Grass Trail #122 has long been a public trail marked on Forest Service maps. It has been maintained with public money and been subject to well-documented public use. However, like on several other trails in the Crazy Mountains, landowners have in recent years tried to obstruct public use of the trail. Two of the landowners who obstruct the trail hold outfitter licenses to operate on the public and private lands that the trail accesses and stand to gain financially by choking off public access and creating more exclusive use of this land. One of the outfitter-landowners sells guided elk hunts in the area for \$5,550 each.

This proposal would abandon the public claim to Sweet Grass Trail #122 and forever relinquish the Sweet Grass canyon access point in the Crazy Mountains. Proponents argue that this proposal "resolves" public access disputes by establishing a new trail that would contour from Big Timber canyon 22 miles north to Sweet Grass Creek. But the public already has an unobstructed 20-mile route to Sweet Grass-from Porcupine or Trespass Creek on the other side of the range. I've made the walk once myself. This new trail would do nothing to improve access to Sweet Grass, but it would forfeit some of the public lands along the creek that make the long walk worth it.

One evening while descending from Cave Lake, I caught several eating-sized fish in Sweet Grass Creek and later ran into a cow-calf herd of elk in Eagle Park. What is at stake here is nothing less than whether this experience on Sweet Grass will be open to all of us or become another exclusive experience for the ultra-wealthy.

\* This proposal was crafted by wealthy interests without meaningful public participation

I'm also concerned about the process that created this proposal. The proposal was created in private discussions between Crazy Mountain landowners, a handful of environmental groups and consultants paid by the Yellowstone Club. It was not conducted by the public or a public agency. For journalists and the public, the difference is important: None of the meetings were open to the public and many of the communications are not subject to public records laws. Furthermore, at least one of the environmental groups that claims to represent the public in these discussions received funding from the Yellowstone Club's consultants.

I think a proposal that included real public participation would look substantially different, which is a major reason why I think this proposal is unsalvageable. If the Forest Service is serious about a land swap on the east side of the Crazies, the agency should start the negotiating process over again with meaningful public participation, public access to meetings and on the public record. At the very least, the agency should conduct a full environmental impact study of this proposal, craft other alternative proposals based on extensive public participation and submit those for further public consideration and public comment.

Thank you for the opportunity to register my strong opposition to this land exchange proposal.

-Joseph Bullington