Data Submitted (UTC 11): 11/10/2023 10:29:45 PM

First name: David Last name: Patenaude

Organization:

Title:

Comments: Hello,

The deed restrictions must be more permanent and protective of the Crazy Mountains: The deed restrictions outlined in the EA are not permanent conservation easements and do not prohibit any kind of commercial or residential development like luxury resorts and subdivisions. The covenants that do exist only apply to the lands exchanged in the Sweet Grass and Big Timber Creek drainages, not all the land being traded to private landowners. In the South Crazy land exchange, all landowners agreed to voluntarily place permanent restrictions on the federal lands to be conveyed into private ownership at the closing of the exchange. This land exchange lacks this permanent protection.

More analysis is needed to determine if reasonably foreseeable future uses of the land being traded will harm wildlife and the ecosystem: The EA relies on an assumption that landowners receiving federal land in the exchange will not develop their property, an outcome that is not guaranteed. It is also shortsided considering the growth and development pressures in Southwest Montana. The Forest Service must analyze these reasonably foreseeable land uses unless there are much more protective land use restrictions put in place.

New boundary adjustments require further analysis: The boundary adjustment to protect and improve access to Sweet Grass Creek in Section 10 was a positive improvement from the original proposal but may lead to increased resource damage caused by people walking up the creek bed and creating new camping areas on Sweet Grass Creek. We suggested alternatives to allow the use of the existing Sweet Grass trail and camping areas like Eagle Park to reduce new disturbance.

The land exchange should not be finalized until voluntary commitments are formalized: Other commitments made by private landowners involved in the trade such as allowing seasonal access to Sweet Grass Creek trail, and permanent protection and Tribal access to Crazy Peak are not addressed, or in some cases not even mentioned in the EA. PCEC participated in many conversations where additional public benefits were discussed and we are concerned that if not formalized, these widely advertised commitments may not be carried forward.

Regards