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Comments: 1) The proposed exchange still does not adequately protect the lands transitioning to private with conservation easements to prevent development. I mean no disrespect to the current landowners, but in spite of assurances that the soon-to-be owners are ranchers with no interest in development, two of the parties already have guest ranches and another has a small cabin that you can rent. The fourth has a small house in the Sweetgrass drainage. One of the aforementioned parties has recently developed a private in-holding that formerly had wilderness characteristics.

Even if the land is currently in the hands of a ranching family, the future is uncertain. The Lazy K Bar ranch is an example where a multi-generational resident sold to a non-rancher that developed an in-holding.

Again, I mean no disrespect to the landowners involved, but, in short, the risk of developing this land is real. Unprotected, development is almost certainly going to happen eventually if for no other reason than ownership will change when the current landowners die; therefore, the lands must be protected by conservation easements. Conservation easements similar to the ones in the South Crazy Land Exchange are suitable.

2) Claims to access rights on the Sweet Grass road need to remain, or at least be valued and fairly compensated for in the exchange. This claim to access rights must include the trail that originates at Eagle Park and continues to the trail sections protected by easements. The Sweet Trunk trail is too long and rigorous to be considered suitable compensation.

The Forest Service has multiple documents showing that longtime local residents (Ralph and Betty Cosgriff, and Tack and Carol Van Cleve) claim the road up Sweet Grass Canyon is a public road that crosses private land. (See my previous comments on this exchange.) Obviously the road sections on current public land are public. Railroad deeds and county maintenance records also suggest the road is public. If these items are proven true in court, the only way that access can be denied is for the Forest Service to formally abandon rights to their parts of the road, which is exactly what they are planning to do with this exchange.

While the EA does address the access in the context of a trail (history of permissive use, etc.), it does not thoroughly address it in the context of it being a county road with a history that suggests it is public. Finally, it isn't lost on me that, if the existing road through private land is not public, the new landowners should not object to the Forest Service retaining access rights to segments of that road because access is already blocked by them.

3) The need for including parcel 4 (Wolf Park) is not addressed in the EA. It appears to be gratuitous, a loss to the public of prime habitat, and is certainly not necessary to meet the goals of this exchange. It does not appear to be in the public's best interest to give up this parcel.