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To: GMUG National Forest  
Attn: Forest Plan Revision Team  
2250 S. Main St.  
Delta, CO 81416

From: Brian K. Briggs, P.E., Chief Executive Officer

Date: June 2, 2018

Subject: Grand Mesa, Uncompahgre, and Gunnison Forest Plan Revision Scoping, March 2018

Dear GMUG Forest Planning Team,

Ouray Silver Mines Inc. (OSMI) appreciates the opportunity to comment on the Grand Mesa, Uncompahgre, and Gunnison (GMUG) National Forest Plan Revision (#51806) Scoping documents. OSMI owns and operates the Revenue-Virginus Mine, located in the San Juan region of GMUG approximately 6 miles southwest of the City of Ouray. The Revenue -Virginus is both a historic mine, platted in 1876, and fully permitted modern mine with a goal of entering full production in 2019. USFS owns the majority of land adjacent to OSMI patented claims, and OSMI has unpatented claims staked through USFS lands. OSMI proudly partners with GMUG, Ouray County, as well as environmental and recreational groups (i.e. Uncompahgre Watershed Partnership, Six Basins Project, and Trout Unlimited) on the maintenance of County Road 361, recreational access, abandoned mine land restoration, wilderness proposals, and sanitation projects. Consistent with our line of business, comments focus the consideration of mineralized lands. Our comments, presented below, address the framing questions and are organized similarly to the Scoping document.

**I. Forest Plan Vision, Roles, and Contributions of the GMUG**

OSMI acknowledges the multifaceted nature and adaptability of the Forest Plan vision, roles, and contributions. Mineralized lands, however, are not given proper consideration in the Commodity Use and Community Connections section. While the Somerset coalfield has been the subject of intense legal scrutiny, it is far from the only extractive resource in GMUG and its inclusion as the stand alone non-renewable resource at the Scoping level is overly specific.

Topic 10, the draft assessment relating to Energy and Minerals, indicates that there are 1752 unpatented mining claims, totaling over 26,000 acres, 89 mining or exploration permits, and 18 active Plans of Operation. Mineralized lands have a profound ability to affect aquatic and terrestrial ecology, whether the land has been mined or not. These lands also have strong effects on social and economic development. OSMI requests that mineral resources be given a scope reflective of the abundance, types, and importance of mineralized lands (both locatable and non-locatable) within GMUG, and that the standard for potential resource be applied across GMUG lands. Without proper consideration of mineralized lands at the Scoping level, the associated environmental, social, and economic risks and rewards of those lands cannot be properly evaluated.

**II. Key Needs for Change**

The Key Needs for Change section of the Scoping document tend to focus on timber sales and recreation. However, OSMI requests that GMUG add as a need “increased direction

regarding the uses, benefits, and management of mineralized lands” in consideration of the following:

- The potential for social and economic development, both current and long-term, as supported by USDA comment responses regarding the North Fork Coal Mining exception in the Colorado Roadless Rule.
- The national strategic importance of the minerals on the land managed by GMUG.
- The heritage tourism interest generated by historic mining sites.
- The unique biogeochemical nature of mineralized areas which affect water quality, as well as aquatic and terrestrial ecology regardless of the actual occurrence of mining.
- The potential for the USFS to be held as potentially responsible parties under CERCLA authority on abandoned mine lands, as referenced in the current evaluations under Topic 10, Recent Case Law.

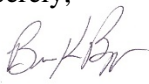
OSMI has worked with local stakeholders, including the Sheep Mountain Alliance, to create boundaries for the proposed San Juan Wilderness Act that are not immediate threats to the operation of the Revenue-Virginus. We were, however, disappointed to realize that the roadless evaluation (RARE II) did not appear to include known metals deposits in the ‘Minerals’ section of the ‘Availability’ analysis for the proposed wilderness. The USGS report on Resource Potential and Geology of the GMUG National Forest and Vicinity (USGS Bulletin 2213) indicates the existence of economically viable polymetallic vein deposits in the area. Much of this area was excluded from the 1983 Wilderness Act because of known mineral wealth. In addition to potential mining resource, the remediation of historic mine impacts in now-roadless areas should also be considered. Inclusion of mineralized land in future evaluations (of all types) will facilitate the management of mineralized lands to the public’s benefit

### **III. Management Area Framework**

OSMI requests that mineral rich areas be given a place within the Management Area Framework based on the reasoning presented above, either as a Special Area, Unique Landscape, or specific type(s) of Natural Area. OSMI hopes that the space given to mineralized lands within the framework will be ample enough to provide direction on specific types of mineralization (i.e. polymetallic veins, uranium deposits, rare earth deposits, etc.). Inclusion of mineralized areas in the Management Area Framework will facilitate management of these lands to achieve the greatest ecological, social, and economic benefit.

OSMI looks forward to continued involvement in the Forest Planning process, and appreciates the continued interaction with GMUG. Please feel free to contact us with any questions at 970-325-9830.

Sincerely,



Brian K. Briggs PE  
CEO, Ouray Silver Mines Inc.