



August 6, 2019

***VIA EMAIL, FIRST CLASS MAIL
AND ELECTRONIC SUBMISSION***

Grand Mesa, Uncompahgre
and Gunnison National Forests
Attn: Plan Revision Team
2250 South Main Street
Delta, CO 81416

**Re: Gunnison County Supplemental Informal Comments Regarding Revised Land
Management Plan**

Dear Plan Revision Team,

On behalf of the Board of County Commissioners of Gunnison County (“Gunnison County” or “County”), we submit below the following supplemental comments to the United States Forest Service’s (“USFS’s” or “Forest Service’s”) Grand Mesa, Uncompahgre and Gunnison National Forests (“GMUG”) Working Draft of the Revised Land Management Plan (“Forest Plan” or “Plan”). This letter provides comments in addition to those submitted by us on July 29, 2019, and is not intended to replace those comments. As before, please do not consider the comments contained in this letter to be the only, or final, comments that the County may submit regarding the Forest Plan during the planning process. Gunnison County reserves the right to submit additional or different comments as the planning process progresses.

ADDITIONAL COMMENTS ON THE WORKING DRAFT

Gunnison County provides the following additional, informal comments on the working draft of the Forest Plan:

I. THE FOREST PLAN SHOULD DESIGNATE THE NATIONAL FOREST LAND IN THE VICINITY OF MT. EMMONS MINE AS ITS OWN SPECIAL INTEREST AREA.

As USFS is undoubtedly aware, the north end of the Gunnison Valley is faced with longstanding issues regarding water quality and other impacts due to mining operations on the flanks of Mt. Emmons. In particular, the Lucky Jack Wastewater Treatment Facility, constructed by then mine operator AMAX Exploration, Inc. in 1981, is located on USFS land, and is therefore subject to USFS jurisdiction and regulations. In February 2016, a number of state and local government bodies, including Gunnison County, the Town of Crested Butte, and Colorado mining, water and air quality and other state regulatory agencies, executed a memorandum of understanding with the current mine operator, Mt. Emmons Mining Company, to identify and support cost effective solutions to ensure ongoing protection of the environment and the public safety, health

and welfare of Gunnison County residents and visitors to the area surrounding the mine. Pursuant to this memorandum, the County is currently engaged with the parties to the memorandum and other stakeholders regarding site management, plans of operation and other matters intended to implement the goals of the memorandum.

Given the foregoing, the unique and ongoing challenges with ensuring air and water quality and mitigating other impacts in this area, Gunnison County suggests that the area surrounding Mt. Emmons and the Lucky Jack Wastewater Treatment Facility be designated its own Special Interest Area ("SIA"), with stated conditions, objectives and guidelines consistent with the aforementioned MOU and to ensure an appropriate Plan of Operations and continued water quality monitoring, working in cooperation with the current mining operator, the County, the Town of Crested Butte, the remaining parties to the MOU, and other stakeholders. Importantly, this comment should not be construed as reflecting the County's views on how the issues surrounding the mine and the treatment facility should be ultimately determined, only a recognition of the special circumstances in this area of the National Forest.

CONCLUSION

Gunnison County appreciates the opportunity to provide the foregoing additional comments.

Best regards,



Matthew R. Hoyt
Deputy County Attorney