



Colorado Wild Public Lands

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September 15, 2022

Chad Stewart
Forest Supervisor, GMUG National Forest
2250 Highway 50
Delta, CO 81416
chad.steward@usda.gov

CC: Cory Wong, Project Manager
coreypwong@gmail.com
CC: Jonathan Hare, District Realty Specialist
jonathan.hare@usda.gov

Re: Mt. Emmons Land Exchange Documents Request

Dear Forest Supervisor Stewart,

Colorado Wild Public Lands (CWPL) is a 501(c)(3) organization whose mission is to protect the integrity, size and quality of public lands in Colorado. In concert with this mission, we monitor land exchanges around the state; we also work to keep public lands both public and accessible.

After reviewing the information made available to the public concerning the proposed Mt. Emmons land exchange, we have identified documents and information that would be valuable for the public to have access to in the review of this exchange. We ask that you not consider this a request under the Freedom of Information Act (FOIA), and that you not forward this along to the FOIA office. Please provide the following documents; ideally these should be posted on the project website in addition to sending them to Colorado Wild Public Lands.

- 1.) Baseline Documentation Report for the Conservation Easement on the Federal Parcels
- 2.) Mar 28, 2022 Valuation Consultation [Feasibility Analysis (FA) at 43]
- 3.) Statement of Work for Appraisals*

- 4.) Request to BLM for serialization/Segregation [Item 12 of Agreement To Initiate (ATI)]
- 5.) Any already completed Threatened and Endangered Species (TES), wildlife, wetland, plant and cultural reports reports
- 6.) Management Plan [Deed of Conservation Easement, Exhibit D]
- 7.) Correspondence and emails among Grand Mesa Uncompahgre and Gunnison (GMUG) National Forest, the State of Colorado and any others regarding bonding for post-exchange Mount Emmons Mining Company (MEMC) operations per discussion in FA at 48.

**The ATI indicates that appraisals were requested in July 2022, so we assume they are underway and subject to the guidance of this document.*

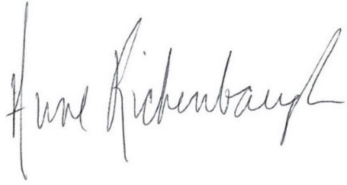
Please release the following documents as they are completed (bracketed information includes the expected date of completion per the ATI):

- 8.) Mineral potential report [Item 21 of ATI, September 2022]
- 9.) Appraisals and Technical Appraisal Review Report (TARP), Approvals and Agreement on Values [Items 33-35 of ATI, November/December 2022]
- 10.) Administrative easement to Forest Service (FS) on 732, 732.A1 [Referred to in FA at 13 and 26]
- 11.) Public Easement on FS 585 to Gunsight Pass (jeep road) [Referred to in FA at 13 and 26]
- 12.) Upcoming TES Report [Item 24 of ATI, November 2022]
- 13.) Any additional NEPA documentation [Per item 30 of ATI], including but not limited to wildlife and botany reports, wetland reports, additional water rights analysis. *If it is cited in a subsequent NEPA document, it should be released to the public.*
- 14.) Draft Exchange Agreement [Item 38 of ATI]

This exchange has the potential to truly benefit the public as well as the proponent in significant ways and it is one that CWPL would very much like to support as long as the agency undertakes every effort possible to ensure the outcomes promoted to date and provides the public its right to due diligence through a fair NEPA process. We urge you to please provide the documents and information requested herein.

Thank you for your consideration of these requests.

Yours sincerely,

A handwritten signature in cursive script, reading "Anne Rickenbaugh". The ink is dark and the signature is fluid, with a large initial "A" and a long, sweeping underline.

Anne Rickenbaugh
Colorado Wild Public Lands
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