

# Town of Crested Butte

P.O. Box 39 Crested Butte, Colorado 81224

*-A National Historic District-*

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Douglas J. Vilsack  
BLM Colorado State Director  
2850 Youngfield St.  
Lakewood, CO 80215

Director Vilsack and Team:

The Town of Crested Butte is pleased to see the Notice of Proposed Withdrawal for Thompson Divide published in the federal register on October 17<sup>th</sup>, 2022. This takes lands in our area one step closer to permanent protection from large scale extractive industries, a pursuit our Town has undertaken for the last 4 decades. While this withdrawal does not hold the permanence that a congressional withdrawal may, we are largely supportive of its implementation until a congressional solution can be employed.

We would like to reiterate our desire to engage with the lead agency, which was said to be the GMUG National Forest at the December 14<sup>th</sup>, 2022, public meeting in Carbondale, as a cooperating agency. The Town of Crested Butte has participated as a cooperating agency on several forest initiatives to help produce positive results both for the agencies and our constituency. The Thompson Divide Mineral Withdrawal will be no different. Our qualification as special expertise in the planning area under 43 CFR § 46.225 would require an invitation by the lead agency and we hope to see one as the NEPA process begins.

The Town has been working diligently with the GMUG leadership, Gunnison County, Mt. Emmons Mining Company (MEMC), and the Crested Butte Land Trust to execute a land exchange, conservation easement, and mineral extinguishment on properties on Mt. Emmons. This exchange is intended to permanently protect this area from large scale mineral extraction and ensure that water treatment facilities can be maintained by MEMC with permanence. The map released in the Federal Register notice for the Proposed Withdrawal for Thompson Divide unfortunately overlaps with federal parcels 2 and 3 of the exchange, theoretically segregating them from disposal by the Forest Service through the land exchange. Town would like to see the Thompson Divide legal description amended to the absolute minimum necessary degree to exclude these parcels so the land exchange can be completed as scheduled. We have attached the legal descriptions of these parcels as an exhibit to this comment letter.

We appreciate the opportunity to continue working with the federal agencies that surround our Township and own most of the land in our primary watershed. We are hopeful that the Proposed Withdrawal for Thompson Divide will be accepted by Secretary Haaland after the NEPA process is complete, allowing us to bridge the gap until a congressional withdrawal can be implemented. The Town of Crested Butte is ready and willing to participate in the withdrawal process and we look forward to doing so.

Regards,



Mayor Ian Billick

Cc: Chad Stewart-GMUG Forest Supervisor  
Anthony Edward-GMUG Deputy Forest Supervisor  
Dayle Funka-Gunnison National Forest District Ranger  
Jennifer Jardine-BLM Senior Realty Specialist  
Scott Fitzwilliams-WRNF Forest Supervisor

**Parcels Town of Crested Butte is requesting to be *excluded from the Proposed Withdrawal for Thompson Divide to facilitate completion of the federal land exchange already underway.***

**Federal Parcel 2: Lands west of MEMC patented mineral surveys**

Township 13 South, Range 86 West

Section 31:

Portions of Government lots 16-18, by extending line 3-4 of M.S. No. 20825, Park City No. 1 southwesterly 600.00 feet distance from corner no. 2, M.S. 20825, Park City No. 11, on said line 3-4 of M.S. No. 20825, Park City No. 1 to intersect a line parallel to line 2-3, M.S. No. 20825, Park City No. 11, thence along the said parallel line northwesterly to the intersection of the section line between section 31 and 36, and portions of Government lots 14 and 16, being the portion of M.S. No. 20926, Park City No. 15 lying east of the section line between section 31 and 36. Excepting there from all lands conveyed as Mineral Survey No. 20825, Patent No. 1226111, and Mineral Survey No. 20926, Patent No. 05-2004-0003;

and

Township 13 South, Range 87 West

Section 36 (unsurveyed):

All portions of M.S. No. 20926, Park City No. 15 in Section 36 (unsurveyed), and by extending line 2-3, M.S. No. 20926, Park City No. 15 southwesterly 600 feet +/- to intersect a line described above from the intersection of sections 31 and 36 paralleling line 2-3, M.S. No. 20825, Park City No. 11.

Totaling approximately 81.49 acres, more or less.

**Federal Parcel 3: Mineral Survey Fraction north of MEMC patented mineral surveys**

Township 13 South, Range 86 West

Section 30: Government lot 21,

Section 31: Portion of Government lot 12 north of line 2-3 M.S. No. 20926, Park City 19, A Mineral Fraction bounded on the NE by Line 7-8, M.S. No. 4767, Germania Lode, bounded on the South by line 2-3, M.S. No. 20926, Park City 19 and bounded on the West by the East line of Government Lot 12.

Totaling approximately 3.15 acres, more or less.