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First name: Conor

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Organization:

Title:

Comments: Objection to Land Exchange in Valle Seco Scoping Comments

Dear Rebecca Smith,

As a Durango native, I have both procedural and substantive concerns about this proposal. Substantively, the Forest Service has a public trust obligation to preserve our wild areas. Procedurally, I can attest first-hand to the scope of the significant impact these kind of sales can have on the environment. At minimum, therefore, the appropriate NEPA procedures should be observed, and a public EA/EIS process initiated. The origins of this proposal also lead me to wonder whether it is in line with APA requirements for agency action.

I am writing to offer comment on the Valle Seco 2019 Land Exchange. I object to the disposal of wilderness quality roadless lands adjacent to the South San Juan Wilderness, and to the disposal of public river access and recommended wild and scenic rivers, as contemplated in the scoping announcement for this project.

The South San Juan Wilderness is among Colorado's wildest areas, and the lands within the adjacent roadless area included within this contemplated land exchange have been proposed for wilderness designation by conservation advocates for over 20 years. The San Juan National Forest previously deemed wilderness designation of this roadless area unnecessary because it was protected under the Colorado Roadless Rule. It is a betrayal of the public interest to quickly turn around and give away wilderness-quality roadless lands just because a neighboring billionaire wants them.

The East Fork of the San Juan River was recommended by the Forest Service for protection as a wild and scenic river in the 2013 San Juan Forest Plan. This resulted from decades of advocacy by anglers, boaters, and other river supporters. Again, it violates the public's trust to almost immediately turn around and hand over part of the wild river corridor to the adjacent billionaire.

It is also inconceivable to give away a stretch of the only public access to the San Juan River upstream of Pagosa Springs. It is an enormous step backward to take away existing public access for no other reason than to please an out-of-state billionaire.

It is also imperative that this process be conducted in a completely open and transparent manner. The land exchange proponent's lobbyists at Western Land Group are skilled at promoting the interests of their clients behind closed doors, and the public deserves equal treatment -- the same access to decision-makers and documents as the lawyers and lobbyists get.

If the overriding purpose of the project is acquisition of Valle Seco for the value of its big game wildlife habitat, then a more feasible and widely supported approach is for the Forest Service to simply purchase the 880-acre Valle Seco property using the Land and Water Conservation Fund, which Congress is presently moving to permanently fund at \$900 million per year.

I hope you will seriously consider rejecting this proposal.

Sincerely,

Conor May

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