

Data Submitted (UTC 11): 9/29/2020 6:00:00 AM

First name: Terrence

Last name: Milligan

Organization:

Title:

Comments: Objection to Land Exchange in Valle Seco Scoping Comments

Dear Rebecca Smith,

I am writing to offer comment on the Valle Seco 2019 Land Exchange. I object to both the disposal of wilderness quality roadless lands adjacent to the South San Juan Wilderness and the disposal of a recommended wild and scenic river corridor, as proposed in 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.

Given the extraordinarily controversial nature of eliminating wilderness-quality roadless areas and recommended wild and scenic rivers for private benefit, it is imperative this proposed land exchange be analyzed in a full-blown Environmental Impact Statement.

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 has permanently funded at \$900 million per year. In any case, no alternatives should be pursued that require selling a portion of the South San Juan adjacent roadless area to accomplish this acquisition.

I encourage you to promptly reject this project. It is not in the public interest to hand over protected roadless areas to politically-connected megadonors.

Sincerely,

Terrence Milligan