May 13, 2021

Dear Mr. Krickbaum,

As you are aware, Great Old Broads for Wilderness/Northern San Juan chapter submitted comments during scoping. Although our concerns were identified in the final Scoping Report, they were not addressed in the draft EA nor were they considered significant in the FONSI Report.

Given that our chapter (that encompasses Ouray County) and our membership are deeply concerned about fragmentation of habitat, once again we ask that you consider exchanging some BLM parcels adjacent to and contiguous with the Billy Creek State Wildlife Area in northern Ouray County rather than the two in your preferred alternative.

Furthermore, the EA recognizes that “Impacts on ROWs could occur in cases where permits expire after the conveyance, at which point any continued use would be subject to the discretion of the State.” One such ROW is located in Ouray County and of great concern as CR 17 is a critical access/egress in case of emergency. In our scoping comments, we wrote, “The parcel in section 11 includes a portion of CR 17, which, for county emergency preparedness, is a critical alternative route to Highway 550. It is unacceptable to compromise the safety of county residents and visitors knowing that, at a future time, CR 17 could be closed by the State Board or by a private owner or leasee if the parcel is sold or leased. Dolores and San Miguel Counties have experienced just such a closure with San Miguel CR 40J.” This concern has not been adequately addressed by the BLM nor do we feel sufficient public comment has been solicited to accurately assess the potentially compromising situation for residents and visitors if access along this road were to be obstructed.

Though the EA references evaluation of cultural sites, we see no response to our comments regarding the access guaranteed to Ute tribal members per the 1873 Brunot Agreement. As we understand the sovereign nation-to-nation agreement, Ute tribal members are guaranteed hunting rights in perpetuity on these land parcels. The proposed land transfer could interfere and even negate those rights of Native People. We oppose any action by the BLM that could have deleterious impacts on Indigenous hunting rights or access.

Please note that our local chapter of Great Old Broads for Wilderness has signed onto the letter submitted by Colorado Wild Public Lands and endorse the comments contained therein.

Thank you for consideration of our comments.