



COLORADO WILD PUBLIC LANDS

December 20, 2019

BLM Colorado State Office
Attn: Bruce Krickbaum
2850 Youngfield Street
Lakewood, CO 80215

Dear Mr. Krickbaum and the BLM Colorado State Office,

Thank you for the opportunity to provide comments for the Scoping Phase of the proposed transfer by the BLM of approximately 17,700 acres of federal surface/federal mineral estate, and an additional 6,000 acres of federal mineral estate only, to the State of Colorado. We understand that public comments received in this scoping phase will inform, and be addressed in, the next phase of your NEPA analysis of the proposal, most likely an Environmental Assessment (EA).

Colorado Wild Public Lands is a non-profit organization whose mission is to protect the integrity, size and quality of public lands in Colorado. We appreciate your consideration of the following comments:

PUBLIC INFORMATION AND OUTREACH

To date, very little information has been made available to the Public. We suggest that the Colorado BLM and Colorado State Board make information more publicly accessible. Both Agencies should reach out to the various communities proximate to the proposed transfer parcels. Public meetings should be held in in close proximity to the nearby communities early in 2020. The project website should contain links to all available information on the proposal to date, including public comments as they are received.

INCLUDE PARCEL SPECIFIC INFORMATION

One of the challenges of doing a statewide project is that it is easy to allow parcel specific information to be overlooked. There should be in depth analysis of the natural and cultural attributes, and existing and proposed uses, of each of the parcels under

consideration. To begin, please include the number, identification, location and County, of all parcels under consideration.

In addition to the parcel location maps that are helpful, we suggest that additional parcel specific mapping be included to show the following:

- Land ownership specifics and property boundaries of all lands abutting the parcels.
- Natural features of the property including rivers, streams, wetlands, riparian areas and wildlife habitat.
- Manmade attributes including roads, trails, public rights of way and access, structures, cultural or archeological areas.
- Any other pertinent parcel information including oil and gas extraction, mineral rights etc.

PROVIDE REASONS AND METHODS

Provide the rationale for calculating the value or amount of land that is owed by the Colorado BLM to the State of Colorado today. Quantify and provide the amount and value of the proposed lands and mineral rights to be conveyed. We understand that the current proposal includes 17,700 acres of land and 6,000 acres mineral estate for payment of a debt of 9,900 acres?

Include information on the BLM's obligations to the State, how this land gift will satisfy that and if there are alternative ways of meeting those obligations. Once this proposed transaction is complete, will the BLM's debt to the State be met?

ADDITIONS TO THE BLM'S PRELIMINARY LIST OF ITEMS TO INCLUDE

The BLM identified preliminary issues through internal scoping. We have added to those issues as follows:

1. Include more alternatives than just the no-action alternative, for example are there other lands that might be more suitable for conveyance?
2. Provide the BLM or State's criteria used to select specific parcels, how each parcel meets those criteria, the State's plans for the future of the parcels.
3. Will rights-of-way and County roads continue to be recognized if land is transferred to the State, and what would the impacts be to rights-of way, including those that are converted, and not converted, to a perpetual right-of- way? Describe current public access opportunities and future plans for public access. Where public access exists, it should remain.

4. What would the immediate and future effect be on current authorized uses if the selected lands were conveyed?
5. Will the State be permitted to sell either the land or the mineral extraction rights to private parties and if so, provide details?
6. What are the current and anticipated future status of oil, gas and other mineral extraction on the lands? Will extraction be increased, reduced or stay the same? We suggest no expansion of oil, gas or other extraction activities.
7. What would the immediate and future effect on livestock grazing operations and existing grazing permits be if the selected lands were conveyed?
8. What would the impacts be to cultural and historic properties by removing federal protections if the selected lands were conveyed? There should be continued, and additional protection if needed, of such resources.
9. What would the impacts be to special status species populations and habitats, including BLM sensitive species and Federal threatened or endangered species, if the selected lands were conveyed? There should be no negative impacts.
10. Considering future uses of the land, what would the impacts be to wildlife populations and habitats if the selected lands were conveyed?
11. What impact would there be to public access, hunting, and recreational traditions and benefits if the selected lands were conveyed? Will there be additional hunting, recreational and public access opportunities? There should be no reduction in the above uses.
12. What are the opportunities for continued protection of the transferred lands, e.g. which lands will become part of the State parks system? Will any of the lands be subject to conservation easements?
13. What would the effect on Counties be as a result of a potential reduction in Payment in Lieu of Taxes (PILT) if the selected lands were conveyed?
14. What would the effect be on the socioeconomics of the area if the selected lands were conveyed?

PARCEL SPECIFIC INFORMATION

1. Chaffee County Parcels – Are these to only have mineral rights conveyed? There is a note about selection for geothermal potential. Does this refer to existing hot springs? If so, describe existing and potential public access and ensure that public access to them is retained in perpetuity.
2. Eagle County Parcels – Will conveyance of these parcels result in loss of public access to other public lands and/or rivers.
3. Huerfano County Parcels – See 2 above.
4. Kiowa County Parcels – Do these parcels contain riparian habitat? If so, the riparian areas should be preserved as riparian is a rare and valuable ecosystem in Colorado.
5. Garfield and Ouray County Parcels – What are the State’s intentions for them? The parcels in both counties are proximate to state or county roads, residences and streams and rivers. These are not suitable for any type of mineral development. This applies to a Routt County parcel abutting the Town of Steamboat Springs as well.

CONCLUSION

Thank you for your consideration of our comments. We look forward to the opportunity to attend a Public Meeting to obtain further information, access updates on information via the BLM website and review a thorough environmental evaluation under NEPA, including the responses to our concerns.

Yours sincerely,

A handwritten signature in black ink that reads "Suzanne Jackson". The signature is written in a cursive, flowing style with a long, sweeping underline.

Suzanne Jackson, Staff Person

and the Colorado Wild Public Lands Board of Directors