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Dear Ms. Smith, Ms. Chadwick, and Ms. Buchanan,

RE: Comments regarding the Valle Seco Land Exchange Appraisal Reports.

The following are the comments of Colorado Wild Public Lands (CWPL) and the San Juan Citizens Alliance (SJCA) on the Valle Seco Appraisals. We submit these comments in conjunction with those previously submitted on the draft Environmental Assessment, our objections, and all communications regarding the Agency release of these appraisal reports.

The comments in this letter are organized as follows:

- I. Overview.
- II. Appraisal framework.
- III. Additional appraisal directions influence land values.
- IV. Comparables and value adjustments in the federal land appraisals.
- V. Appraisal does not address values and benefits of assemblage with proponents' land.
- VI. Additional Observations.

I. OVERVIEW.

A fair and transparent valuation of the parcels in a proposed land exchange is crucial to a Public Interest Determination. Although the Valle Seco Draft Environmental Assessment was released in September 2020, and the Appraisals are dated between August 13 and October 26, 2020, it was only after numerous requests, FOIA submissions, an appeal, and a legal complaint, that

Colorado Wild Public Lands (CWPL) received the Valle Seco Appraisal Reports on December 22, 2021. They were posted on the Agency project website on January 6, 2022.

The release included several versions of the Appraisal Report for the Non-Federal (3) and the Federal (5) parcels. Generally, the reports were dated August 13 or 14, 2020. Dates on the cover letters varied from August 13 to October 26, 2020. The reports had some redacted information. One report was redlined. CWPL has yet to receive a non-redacted version of the appraisal.

CWPL and SJCA submitted a request for an additional comment period to review the new information on January 5, 2022; the Objection Reviewing Officer denied this request. We have compiled our comments on the Appraisal Reports to submit prior to the Forest Service's planned January 21, 2022, Objection Resolution and Decision Notice.

Broadly, we considered the appraisals from two perspectives: the first was to review the information in the context of the appraisal framework established by the Forest Service such that the "Federal land and interest in land shall be appraised as if in private ownership and available for sale in the open market". For this analysis, we looked at the Appraisal Report for federal lands selection of comparables; and methods of adjusting land values based on the type of land and access opportunities.

The second perspective involves querying the framework of the Forest Service direction that "Federal land and interest in land shall be appraised as if in private ownership and available for sale in the open market" (CFR Title 36 § 254.9 Appraisals. B ii.). Related reasoning includes:

- If the land is assumed to be in private ownership, we might assume that the land has "always" been in private ownership, thereby pre-dating Senate Bill 35 (1973). This would provide a development right to an existing property that is less than 35 acres in size.
- The land should have an access right through necessity[1].
- If the land is available for sale on the open market, consider the sale of the land to adjacent landowners. Appraisal values should evaluate assemblage with the adjacent parcel/s, and how it affects access and development opportunities on the acquired parcel, as well as the potential increased value to the existing adjacent parcel.

The Appraiser states that the highest and best use for each parcel is assemblage with adjacent land[2] (Report with Oct. 26, 2020, letter, at 53-54), yet the benefits of that configuration are not

[1] Colorado law recognizes easements by necessity. Wagner v. Fairlamb, 379 P.2d 165 (Colo. 1963); Thompson v. Whinnery, 895 P.2d 537 (Colo. 1995). These cases and ANILCA identify that the land must be valued as having some reasonable access, whether it is acquired through a legal proceeding or whether it was included in the patent deed, impliedly or otherwise.

[2] Also note that in the Executive Summary [appraisal at 6] the Appraiser cites: "Highest and Best Use: agriculture, recreation, homesites".

included in the Appraisal analysis. Instead, the Appraiser has discounted the values of the parcels three times (see Appendix A) for stated lack of access. (Oct. 26 at 58).

The following sections detail the above points.

II. APPRAISAL FRAMEWORK.

There are appraisal instructions in the Appraisal Statement of Work for the Proposed Valle Seco 2019 Land Exchange (SOW), federal regulations [36 CFR 254 Subpart A, 254.9(b)(l)(ii)], and the Uniform Standards for Federal Land Acquisitions (UASFLA) [Section 1.12] that contrive to remove the lands in the exchange from their existing conditions. These instructions influence the appraisals' valuation methodologies in ways that enhance certain values and diminish others; they also avoid valuation practices prescribed in the Uniform Standards of Professional Appraisal Practices (USPAP), the standards that set methodologies for free market appraisals.

A. Federal Lands as a Package

The SOW contains uncommon appraisal instructions that greatly influence the valuation of the lands in the Exchange. The first of these instructions tries to create a single transaction for all the federal parcels as a package of disparate, non-contiguous lands in an all-or-nothing transaction, rather than assuming multiple transactions that would reflect the value and desirability of the individual parcels:

> "The purpose of these appraisals is to derive a single market value conclusion of a fee simple interest in the package of Federal lands" (SOW at 1)

This instruction seeks to diminish the value of the more desirable Federal parcels by including them with the more restricted ones, and pricing them all together; in a real-world scenario this package would deter some buyers and influence the price other buyers might offer. For example, Parcel 7 is clearly a viable and desirable parcel, adjacent to public lands, with motorized access, lots of flat acreage to facilitate development and proximity to good roads and utilities. In an open market, this parcel would sell for a premium. But the instruction requires it to be bundled in with federal parcels 6 and 8, which are federal inholdings entirely surrounded by private lands and with no adjacency to public lands. These parcels do have a limited market.[3].

Typically, an Appraiser would use a Larger Parcel treatment to create this bundle, but the disparate locations and attributes of the federal parcels make it difficult to apply this treatment, so this instruction serves the same purpose. Interestingly, the Appraiser says this instruction cannot be supported by USPAP Standards Rule 1-4(e):

> "'An appraiser must refrain from valuing the whole solely by adding together the individual values of the various … component parts." Needless to say, there is not good

[3] Although, Parcel 6 is surrounded by multiple owners, any one of whom may be interested in acquiring it through a sale, the land exchange makes this opportunity available to only one of them.

market evidence to indicate if an adjustment is necessary to arrive at a single value." [federal Appraisal at 74]

The Appraiser assigns value to the parcels individually, and also notes that market data does not support price adjustments for the application of the instruction.

"I conclude that … a discount…is [not] necessary in this appraisal" [Appraisal at 77]

However, the Appraiser also employs a method used to determine value under the Larger Parcel Treatment and assigns a unit price (price/acre) to the various groupings of the federal parcels; one for the San Juan area parcels, one for the Blanco Basin parcels, etc. These unit prices, though varying from area to area, do impact the values of the individual parcels. As discussed later, the Appraiser has eliminated the higher priced comparables for comparison with the groupings, even though they may be applicable to individual parcels within each grouping, thereby diminishing the value of the more desirable federal parcels.

B. The Hypothetical Condition and Partial Acquisitions.

Federal land exchange appraisal rules include a requirement to

"Estimate the value of the (*federal)*lands … as if in private ownership" [43 CFR 2201.3 (a) (2)],

This creates a Hypothetical Condition that treats the individual federal parcels as separate and independent from any of the adjoining lands, thus voiding USPAP considerations regarding Partial Acquisitions. Partial Acquisition rules under USPAP acknowledge that removing acreage from a larger holding impacts the value of the remaining pieces; thus, the rules require Appraisers to undertake not one, but two appraisal analyses, triggering the Before and After Rule - an analysis of the conditions before the transaction and another one anticipating the conditions after. The "After" analysis must also consider the Damages and Benefits accrued to the remainder lands from the partial acquisition. Application of this SOW provision and the federally required Hypothetical Condition changes the picture presented in the appraisals.

C. Before and After.

Ignoring the Before and After rule skews the valuation picture through limiting conditions affecting the overall value of the subject lands; this partial analysis undervalues federal Parcels 1, 3, 4, 5 and 7 and overvalues Parcel A.

Before Conditions. Under the Hypothetical Condition, Federal Parcels 1, 3, 4, 5 and 7 are developable parcels and the post-exchange beneficiaries of the exchange want to be able to control whether and how the parcels are developed. Development of these parcels may or may not be of value to the proponents; but being able to control this potential is far more valuable to the proponents. The Land Exchange prevents the possibility of a bad neighbor by removing the possibility of another private interest acquiring these lands through sale or exchange. The federal appraisal ignores their Highest and Best Use of homesite development, which the Hypothetical Condition of private ownership now makes possible. Under this condition, the private parcels would have an access right through necessity and would be developable subject to zoning requirements.

After Conditions. Post exchange, the federal parcels will be assembled with the proponents' properties; this assemblage value is extremely high. The beneficiary properties are highly valued trophy ranches with a range of amenities and levels of development. They may one day become very high-end subdivisions. Combining the federal parcels with the various private holdings creates a sort of feedback loop that benefits the proponents through the enhancement of all post-exchange property value, regardless of current public or private ownership

Inclusion of the federal parcels with the already sizeable Bootjack Ranch and the other beneficiaries' properties, will imbue these federal parcels with good, motorized access, enhancing their future development value. The addition of these public tracts with the beneficiaries' acreage increases the value of the already private acreage; the assemblage of the public lands with the proponents' holdings contributes additional *and now exclusive amenities* such as waterfront access, public lands access, increased private hunting opportunities; and allows motorized access over the newly acquired lands to the adjacent public lands, another recreational and development benefit.

D. Damages.

Despite direction to the Appraiser to appraise the federal lands as if in private ownership, it does not change their current disposition as part of a larger federal estate; as such, the land exchange creates a partial acquisition for which the USAFLA requires consideration of the potential damages and benefits to the remainder property. Parcels 1, 2, 4, 5, 7 and 9 are part of much larger blocks of Forest Service lands; many of them include attributes such as access, cultural resources, water and habitat for flora and fauna that are not reciprocated in the exchange. Conveying these values to a private interest diminishes the value of the remainder blocks by removing attributes that contribute to the public enjoyment and help to support the biodiversity of those adjacent public lands.

Additionally, conveyance of parcels 3, 4 and 6 damages other adjacent privately owned lands by eliminating their access to public lands which will likely impact their property values. These damages have financial value and are compensable; the appraisals should acknowledge this.

E. Benefits.

The discussion above demonstrates the substantial benefits that the proponents will enjoy post exchange; and the USPAP rules require that the appraisal analyze these benefits. However, the SOW includes another instruction that excludes this analysis:

> "The appraiser shall not consider land outside the property described in the Agreement to Initiate …" [SOW at 13]

Because the proponents' private lands are outside the scope of the land exchange, they are not described in the Agreement to Initiate (ATI). This instruction limits the scope of the consideration in the appraisal analysis by instructing the Appraiser to ignore the post-exchange benefits of assembling the public and private lands, thus circumventing part of the Before and After analysis.

III. ADDITIONAL APPRAISAL DIRECTIONS INFLUENCE LAND VALUES.

The Agency released a PDF with over 1000 pages that included multiple versions of the Non-federal and the Federal land appraisals[4], including a redlined version of the Federal land appraisal[5].

The red-lined version includes noticeable additions compared with the previous draft[6]. This raises questions about whether the Agency-added text influences the reader's understanding of the land values presented in the appraisals, and to what extent these additions have influenced the material presented in the report.

On page 27 of the federal lands appraisal[7] note #6 says:

> "I submitted the initial appraisal to Charles Brown, Senior Review Appraiser on August 14, 2020. Mr. Brown responded with email comments requesting some corrections ... His suggestions are incorporated in the report dated 27 0816 LOVE APPRAISALS, INC. Proposed Land Exchange Valle Seco 2019 - Federal Parcels August 23, 2020. He also requested a correction included in the October 26, 2020, report." [8]

This was added in the redlined draft of the appraisal regarding the preparation procedures for the appraisal[9] and carried over into all subsequent drafts of the appraisal report. The referenced suggestions alter the way the analysis characterizes the federal parcels' development potential and appear to substantiate findings of lower land values. See more detail in Section IV.

A. Limitations, and Highest and Best Use.

Language emphasizing limitations to the developability or access to the federal parcels was added in the redlined version. Half of page 56 and the entirety of page 57 of the October 26 report contain additional text that describes the federal parcels as not developable.

> "I conclude the only reliable way to value these unusable parcels is as a contributory value to a larger parcel…" [Redlined Appraisal and Oct. 26 Appraisal at 57]

The statements of the highest and best use of the parcels varies throughout the appraisal report. The Executive Summary cites the highest and best use as agriculture, recreation and homesites. [Oct. 26 at 6]; but the rest of the appraisal report cites other variations of highest and best uses, often focusing on agriculture. Thus, the report's finding of highest and best use is not clear.

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[4] We refer to this collection as the PDF, as it was transmitted to us in a single PDF. Some citations will call out page numbers in the PDF.

[5] It begins on p. 582 of the PDF and included a cover letter dated September 23, 2020; we refer to this draft as the "redlined" draft.

[6]This draft begins on p. 434 of the PDF. This is the "previous" draft. It is dated August 13, 2020.

[7] This citation refers to the version of the appraisal accompanied by a cover letter dated Oct. 26, 2020; the appraisal is dated August 14, 2020. It begins on p. 731 of the PDF. We will refer to this as the "Oct. 26" appraisal, and we assumed this to be the official, final version.

[8] This same reviewer's note on this in the Oct. 26 Technical Appraisal Review Report says something different. [federal TARP at 13] Additionally, on page 29, he adds that he met with the proponents and their representatives at which "the parties involved had a chance to provide input" to the Statement of Work.

[9] Citation refers to p. 608 of the PDF.

B. Discount to the Federal Parcels.

The appraisal applies a discount of 50% to 75% to almost all the federal parcels. But the different drafts of the report create confusion about what drives the opinion. The appraisal cites a "market derived discount for the lack of access" [10][Oct. 26 at 57]; and this is the only reason stated in the Oct. 13 draft [at 56]. However, the redlined version adds:

> "This analysis does actually provide a discount for lack of usability, by not showing the premium in unit price witnessed by smaller, legal lots." [Redline at 57]

This statement not only adds "lack of usability" as a reason for the discount, but goes on to say the analysis does not include the higher price range of comparables under analysis:

> "The small legal lot sizes show massive increments for a small size ranging from $26,000 to $40,000 per acre. But they are not comparable because they are developable." [Redline at 56]

Many of the federal parcels do have at least some development potential, and this elimination of the top end of the value range has a substantial effect in lowering the parcels' values, as described in Section IV.

IV. COMPARABLES AND VALUE ADJUSTMENTS IN THE FEDERAL LANDS APPRAISALS.

The federal lands appraisal applies a confusing three-tiered discount to the land values, arriving at a total markdown of between 55% and 89% on the federal parcels when compared with the originally selected comparable sales (Appendix A). The original comparable sales were valued between $26,000 and $40,000 per acre, (Redline at 56) for an average of $33,000 per acre. The specific information on these original, "premium," parcels is not shared within the appraisal, however CWPL has identified several comparable sales with per-acre values in a similar range (Appendix B).

The original, "premium" comparable sales were then discarded in lieu of less valuable parcels. It is unclear if this is due to claims of lack of access or lack of developability. (See Section III.)

The following is also given as a reason for the new baseline value for comparable sales:

> "To arrive at the indicated values, I compare the Subjects to the most similar sales, which have access, and then use a paired sales analysis to supply a market derived discount for the lack of access" (Redline at 58-59).

[10] Interestingly, the analysis also says that "No sales lacking legal access are available that are directly comparable to the Subjects." [Oct. 26 Appraisal at 62], a comment that adds to our questions as to what extent this large discount is warranted.

Opting to utilize a different, lesser valued set of comparable sales represents the first discount tier. This brings us to a new starting per-acre value of between $21,569 and $15,647, with an average of $18,608 for comparable sales in the San Juan River area.

A second discount is applied at Redline 61, when the unit price is dropped to $17,000 per acre, citing Comparable Sale 3 being superior for including irrigation and river frontage. The discount at this tier appears to be for less favorable site conditions on the federal parcels compared with Sale 3 that has irrigation and river frontage. Federal Parcel 3 is within 100 feet of the centerline of the San Juan River, with only a narrow strip of public land separating it from the river, effectively providing river frontage, and making the discount dubious for Parcel 3.

A third and final discount is described (Redline at 62-66), after the Appraiser concludes that:

> "50% discount is appropriate for the lack of access" and is reflected with a new, discounted comparable per-acre value of $8,500 (Redline at 74).

This appears to be the second price discount attributed to accessibility.

This same discount process is applied across the federal parcels 4-9 in the Blanco Basin area and Parcel 11. The locations of the three comparable sales used in this area appear to be on the far fringes of the existing developed and serviced Blanco Basin area, compared with the more centralized and valuable locations of parcels 4-9.

Additionally, two of the comparables used for the Blanco Basin area seem to have started with an artificially diminished sale value. Comparable Sale 1 was sold to Southern Baptists of Texas, with a "donation based on appraisal" (Redline at 94) and Comparable Sale 2 was sold in duress, with the owner having paid $492,000 in 2006 and listed "priced to sell" for $275,000 in 2014 (Redline at 97).

We question whether a discount of between 55% and 89% is justified by the appraisal. The reasons for this triple discount, including an apparent double discount for access, are unclear, when considering potential access and developability of the federal parcels, as described in Sections III and V.

V. APPRAISAL DOES NOT ADDRESS VALUES AND BENEFITS OF ASSEMBLAGE WITH PROPONENTS' LAND.

A. Assemblage of the Federal Parcels with the Proponent's Adjacent Property

Appraisal analyses should consider assemblage with the adjacent parcel/s, and how it affects access and development opportunities on the acquired parcel, as well as the potential increased value to the existing adjacent parcel.

The Appraiser is charged with identifying the "highest and best" use of the land being appraised. In the Federal Parcels Appraisal Report[11] (Oct. 26, 2020, letter), the Appraiser states that:

> The highest and best use of each parcel is for assemblage into an adjoining agricultural use in conjunction with a residential/recreation homesite except for Parcel 7 (p.53)

And identifies specifically that for Parcel 2

> …the highest and best use *(is)* to sell to an adjacent owner (p.54)

The Appraiser states that the highest and best use for each parcel is assemblage with adjacent land, yet the benefits of that configuration are not included in the Appraisal analysis. Such benefits might include access, residential development opportunity, or combination into a high-end hunting and fishing resort that charges guests thousands of dollars per day and provides exclusivity (see https://lindnerranches.com/).

Bootjack Ranch. Generally, parcels 1-3 would expand the already massive Bootjack Ranch which extends through Archuleta County several miles north into Mineral County. One website http://www.mtnworkshop.com/bootjack-colorado describes Bootjack Ranch:

> the (sic) 3,151 acre ranch is a one-of-a-kind world-class family compound and retreat. Valued at 88 million dollars, the ranch is considered to be one of the finest and most beautiful recreation and fly-fishing ranches in the world.

These assertions, especially the valuation may be hyperbolic – but this strategic services study indicates that this ranch and others in the scenic San Juans, are valued highly as recreational and fly-fishing destinations.

Further, from http://www.mtnworkshop.com/bootjack-colorado:

> International Alpine Design was retained by an interested investor in the ranch to provide strategic services focused on understanding the ranch's future development opportunities and subsequent potential return on investment. IAD prepared several design alternatives for future development of the ranch that maximized the ROI while preserving over 1,300 acres in conservation easements.

[11] Also note that in the Executive Summary [appraisal at 6] the Appraiser cites: "Highest and Best Use: agriculture, recreation, homesites"

What could a potential development opportunity look like when Parcels 1, 2, and 3 are assembled with the rest of Bootjack Ranch? The website above, shows a financial forecast for 35-acre homesites on Bootjack Ranch priced at $5,000,000.

El Rancho Pinoso. Parcels 7, 8, and 9 abut El Rancho Pinoso, a working guest ranch owned by the Lindners, that for a fee, provides access to prime fishing. According to their 2021 rate sheet https://lindnerranches.com/wp-content/uploads/2021/03/ERP_rates_2021.pdf two days of guided fishing, three nights stay, room and board with the 4-person minimum at $2,184 per person, would cost $8,736 before taxes and other applicable fees. The per day fee for angling is $500 for a single angler.

The appraisal does not describe future development potential of the parcels once they become privately owned. Rather, it refers primarily to future use for agriculture. Regardless of how the current owners use the property, subsequent owners may have different plans, for example, they may develop to the build-out potential under county zoning.

Moreover, Parcel 7 is perhaps the most valuable parcel in the entire exchange; it has ample public access, river frontage, adjacency to the national forest, and unique features such as old growth and culturally modified trees; post-exchange, these will be enjoyed exclusively by the proponent. And while there exists a conservation easement directly to the north of Parcel 7, the potential to build out on Parcel 7 creates an astounding investment potential for the Lindner's to capitalize on the southern portion of their ranch.

Ranch Preservation Communities. Bootjack Ranch, El Rancho Pinoso, and to a lesser extent, Rancho del Sol could all benefit from a future "highest and best use" called a Ranch Preservation Community (RPC)[12]. This is a large acreage, limited lot subdivision, in which smaller, deeded acreages are sold as homesites, but include a common interest in a much larger acreage. The Appraiser writing the article found that acreage marketed this way sold for substantially more than similar properties marketed as ranch property. Typically, these very large homesites are marketed for their privacy, exclusivity, natural beauty, recreational opportunities such as hunting, archaeological resources, biodiversity, and contiguity to large blocks of public lands. All of the federal parcels in this land exchange benefit to some degree from all of these attributes, and assemblage of these parcels into the existing ranch properties adjacent to parcels 1, 2, 3, 4, 5, 6, 7, 8, 9, and 11 increases their individual value exponentially, especially when taken in light of RPC potential and the overall investment potential of the Trophy ranch concept.

[12] Mundy, Bill. "Trophy Property Valuation: A Ranch Case Study", Appraisal Journal, Jan. 1, 2003, p. 2.

B. Exchange Property Acquisition Cost as Insight to Federal Parcel Assemblage Value.

With each successful public/private land exchange, private proponents are further encouraged and incentivized to purchase federally desirable properties pre-exchange to use as bargaining chips for desired public parcels. The price paid by exchange proponents for these exchange properties may offer some insight into the value of the public parcels.

Bootjack Ranch purchased Parcel A at a time when the Agency was showing an active interest in acquiring Parcel A; indeed, it is likely that they paid more than the asking price. They made the purchase with the intention of gaining leverage to acquire federal parcels 1-3 in a land exchange[13]. The Valle Seco property was purchased by Bootjack Ranch for $4,000,000 on September 4, 2014. The August 13, 2020, appraisal estimates this property to be worth $3,080,000. Given predictable and steady Colorado mountain real estate growth, plus the beginnings of a COVID-fueled real estate spike starting to be felt in 2020, the 2014 market value was potentially even less than the 2020 appraisal. This increases Bootjack's level of overpayment and further emphasizes the value of the federal exchange parcels to the proponent

Undertaking a land exchange in order to acquire property is an inherently uncertain process. Proponents know the end result (assemblage) is much more valuable than a one-time payout from a sale. Assemblage will always carry with it a layer of subjectivity, and in this case, it is clear that federal parcels 1-9 and11 are collectively worth at least as much as the $4,000,000 paid for Valle Seco Parcel A. Additionally, this does not include unknowns which likely increase the $4,000,000 figure, such as transaction fees, acquired mineral rights, expenses of the NEPA process and consultant project managers, and undisclosed agreements with other proponents of this exchange.

VI. ADDITIONAL OBSERVATIONS.

Page 14 of the SOW includes direction that "Sale to the United States or other public entity is not an acceptable highest and best use." This is a strange instruction, given that assemblage with the Forest is the intended post-exchange use.

The Federal Appraisal contains a lot of redactions that appear to be text that is descriptive of the federal lands. These redactions are strange and seem unnecessary, yet the text is removed from the "final" October 26 appraisal. CWPL has requested unredacted versions of these drafts and has not yet received one.

The Senior Review Appraiser identified modifications to some of the federal parcels' flood hazard maps and ratings (Email of August 31, 2020, and Appraisal Report at 42-43). It is unclear how much land in each parcel might be impacted, and what, if any, impact this has on the parcels' values. Proximity to streams or rivers generally adds value to a parcel.

Page 42 of the October 26 federal appraisal, "Assessed Value and Annual Tax Load", is unusual for federal appraisals because federal lands are not assessed nor subject to property taxes. This

[13] Note that Bootjack spent $4 million in order to acquire only 3 of the 9 federal parcels in the exchange.

section is presumably intended to estimate what the tax burden on the federal parcels would be if they were private. This is an unusual inclusion in a land exchange appraisal, and it was added to the redlined version of the appraisal.

The Appraisal Report's effective date is August 14, 2020. The Appraiser was aware that the pandemic could impact land values and stated:

> Currently I do not have sufficient market evidence to evaluate how the pandemic is and will impact real estate values. (Appraisal Report at 7)

Now, in 2022, it is clear that there have been effects on land values due to the pandemic. It is likely that the appraisals may not reflect the current market.

Thank you for your consideration of these comments.

Yours sincerely,

Anne Rickenbaugh

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SAN JUAN CITIZENS ALLIANCE

APPENDIX A: Federal Land Appraisal Report - Comparable Sales and Discounts Analysis

San Juan River Area (PARCELS 1 - 3)

Group	Max Per Acre	Min Per Acre	Avg Per Acre	$ Change From Previous Tier	$ Change From Original Comparables	% Change from Previous Tier	% Change From Original Comparables
Original "Premium" Comparables	$40,000.00	$26,000.00	**$33,000.00**	N/A	N/A	N/A	N/A
New Comparables (Selected for lack of developability, discounted for lack of access)	$21,569.00	$15,647.00	**$18,608.00**	-$14,392.00	-$14,392.00	-44%	-44%
Discounted New Comparables (Discounted for lack of superior features)	$17,000.00	$17,000.00	**$17,000.00**	-$1,608.00	-$16,000.00	-9%	-48%
Final Discounted Appraisal Value (Discounted for lack of access)	$8,500.00	$8,500.00	**$8,500.00**	-$8,500.00	-$24,500.00	-50%	-74%

Blanco Basin Area (COMBINED PARCELS 4 - 9)

Group	Max Per Acre	Min Per Acre	Avg Per Acre	$ Change From Previous Tier	$ Change From Original Comparables	% Change from Previous Tier	% Change From Original Comparables
Original "Premium" Comparables	$40,000.00	$26,000.00	**$33,000.00**	N/A	N/A	N/A	N/A
New Comparables (Selected for lack of developability, discounted for lack of access)	$17,875.00	$5,835.00	**$11,855.00**	-$21,145.00	-$21,145.00	-64%	-64%
Discounted New Comparables (Discounted for lack of superior features)	$7,000.00	$7,000.00	**$7,000.00**	-$4,855.00	-$26,000.00	-41%	-79%
Final Discounted Appraisal Value (Discounted for lack of access)	$15,000.00	$3,500.00	**$9,250.00**	$2,250.00	-$23,750.00	32%	-72%

Blanco Basin Area (PARCELS 4 & 6)

Group	Max Per Acre	Min Per Acre	Avg Per Acre	$ Change From Previous Tier	$ Change From Original Comparables	% Change from Previous Tier	% Change From Original Comparables
Original "Premium" Comparables	$40,000.00	$26,000.00	**$33,000.00**	N/A	N/A	N/A	N/A
New Comparables (Selected for lack of developability, discounted for lack of access)	$17,875.00	$5,835.00	**$11,855.00**	-$21,145.00	-$21,145.00	-64%	-64%
Discounted New Comparables (Discounted for lack of superior features)	$7,000.00	$7,000.00	**$7,000.00**	-$4,855.00	-$26,000.00	-41%	-79%
Final Discounted Appraisal Value (Discounted for lack of access)	$3,500.00	$3,500.00	**$3,500.00**	-$3,500.00	-$29,500.00	-50%	-89%

Blanco Basin Area (PARCELS 5 & 8)							
Group	**Max Per Acre**	**Min Per Acre**	**Average Per Acre**	**$ Change From Previous Tier**	**$ Change From Original Comparables**	**% Change from Previous Tier**	**% Change From Original Comparables**
Original "Premium" Comparables	$40,000.00	$26,000.00	**$33,000.00**	N/A	N/A	N/A	N/A
New Comparables (Selected for lack of developability, discounted for lack of access)	$17,875.00	$5,835.00	**$11,855.00**	-$21,145.00	-$21,145.00	-64%	-64%
Discounted New Comparables (Discounted for lack of superior features)	$15,000.00	$15,000.00	**$15,000.00**	$3,145.00	-$18,000.00	27%	-55%
Final Discounted Appraisal Value (Discounted for lack of access)	$7,500.00	$7,500.00	**$7,500.00**	-$7,500.00	-$25,500.00	-50%	-77%

Blanco Basin Area (PARCELS 7 & 9)							
Group	**Max Per Acre**	**Min Per Acre**	**Average Per Acre**	**$ Change From Previous Tier**	**$ Change From Original Comparables**	**% Change from Previous Tier**	**% Change From Original Comparables**
Original "Premium" Comparables	$40,000.00	$26,000.00	**$33,000.00**	N/A	N/A	N/A	N/A
New Comparables (Selected for lack of developability, discounted for lack of access)	$17,875.00	$5,835.00	**$11,855.00**	-$21,145.00	-$21,145.00	-64%	-64%
Discounted New Comparables (Discounted for lack of superior features)	$15,000.00	$15,000.00	**$15,000.00**	$3,145.00	-$18,000.00	27%	-55%
Final Discounted Appraisal Value (Discounted for lack of access)	$15,000.00	$15,000.00	**$15,000.00**	$0.00	-$18,000.00	0%	-55%

Corral Mountain Area (PARCEL 11)							
Group	**Max Per Acre**	**Min Per Acre**	**Avg Per Acre**	**$ Change From Previous Tier**	**$ Change From Original Comparables**	**% Change from Previous Tier**	**% Change From Original Comparables**
Original "Premium" Comparables	$40,000.00	$26,000.00	**$33,000.00**	N/A	N/A	N/A	N/A
New Comparables (Selected for lack of developability, discounted for lack of access)	$8,818.00	$7,400.00	**$8,109.00**	-$24,891.00	-$24,891.00	-75%	-75%
Discounted New Comparables (Discounted for lack of superior features)	$8,000.00	$8,000.00	**$8,000.00**	-$109.00	-$25,000.00	-1%	-76%
Final Discounted Appraisal Value (Discounted for lack of access)	$4,000.00	$4,000.00	**$4,000.00**	-$4,000.00	-$29,000.00	-50%	-88%

APPENDIX B - POTENTIAL COMPARABLE SALES (compiled by Colorado Wild Public Lands per the Archuleta County Assessor's Website)

SAN JUAN RIVER AREA							
Address/parcel #	**Owner**	**Date**	**Price**	**Size**	**$/acre**	**Zoning**	**Location comments/access**
X Clear River Ct/557933214005	B&J Development	6/7/2021	$2,249,000.00	88.6	$25,383.75	Agriculture/ Ranching	Clear River Ct, King Ranch Minor Subdivision, on Hwy 160, near river, meadows
480 Lone Elk Place/557923113005	Marc Thomas	10/28/2014	$1,060,000.00	43.18	$24,548.40	Agriculture/ Ranching	San Juan River Ranch Subdivision, mixed trees, meadows, river
BLANCO BASIN AREA							
Address/parcel #	**Owner**	**Date**	**Price**	**Size**	**$/acre**	**Zoning**	**Location comments/access**
11651D County Rd 326/570531100031	Frank Harvey Family	19/6/2001	$375,300.00	12.5	$30,024.00	Agriculture/ Ranching	Ranching agriculture/County Rd 326, river frontage, large subdivision
X County Rd 326/570529300032	Dennis Brown Trust	16/9/2011	$390,000.00	13.5	$28,888.00	Agriculture/ Ranching	Ranching agriculture/County Rd 326, subdivision
Tract 1 County Rd 326/570531100032	Oppenheimer Ranch	5/3/2021	$1,500,000.00	36.9	$40,650.41	Agriculture/ Ranching	Ranching agriculture/County Rd 326
X County Rd 326/570529400008	Grouse Meadows LLC	11/1/2007	$1,100,000.00	36.2	$30,386.00	Agriculture/ Ranching	Ranching agriculture/County Rd 326