



Red Hill Project

A Private Non-Profit Organization Supported by BLM, The Town of Carbondale & Aspen Skiing Company Environment Foundation

May 29, 2013

Mr. Monte Senior
Bureau of Land Management
2300 River Frontage Rd.
Silt, CO 81652

Dear Sir:

The Red Hill Council is writing to support the recently completed Environmental Assessment (EA) and the draft “finding of no significant impact” on the proposed Sutey/Wexner/Horse Mountain land exchange that spans the three Colorado counties of Garfield, Eagle and Pitkin. The Red Hill Council is very familiar with the Sutey/Wexner land exchange through its work with the BLM on establishing the Red Hill SRMA and work the Red Hill Council has completed over the years in support of protecting the Sutey Ranch from residential development.

We found the environmental assessment to be very thorough and complete in its analysis of each of the issues described in the document. We applaud BLM for its work and the work of its consultants evaluating the myriad of topics in a high level of detail. We agree with the “Draft Finding of No Significant Impact” conclusions that are based upon the exhaustive research and analysis in the EA.

Protection of the Sutey Ranch has been a priority of the Red Hill Council for at least a decade. We have pursued a variety of options to protect this important property that included discussions with Aspen Valley Land Trust, Garfield County and support for a Garfield County open space program. Unfortunately, none of these options offered a solution to protect the ranch. The proposed Sutey/Wexner/Horse Mountain exchange surfaced as the only viable option.

The Sutey Ranch occupies a critical location northeast of the Red Hill SRMA. As is noted in the EA, the ranch offers important and critical wildlife habitat for deer and elk. The property has valuable water rights that should be retained with the ranch. This property serves as a key linkage between the Red Hill SRMA and the Fisher Creek area. The linkage benefits wildlife by providing a movement corridor and it benefits recreation users because it connects these two large and important areas of public lands. Sutey Ranch is a missing piece in a larger puzzle that has a multiplier benefit to the Red Hill SRMA and Fisher Creek.

The Sutey property offers an opportunity for dispersed access to Red Hill that only has one other access option at the existing Highway 82/133 trailhead. An alternative access point will help spread the use to the area and improve the user experience, minimize environmental damage and will provide a small parking area for visitors.

At the same time, the BLM exchange parcel that would become private has minimal use by the public because of restricted and difficult access as is identified in the EA. The proposed conservation easements and other restrictions on the BLM exchange property will serve to protect the existing and substantial environmental values on the property in perpetuity. These values would be protected even under private ownership and would not place any financial burdens on the public.

The proposed transfer of the private land on Prince Creek sometimes known as the Haines parcel or described as the Monte Carlo property (a.k.a. West Crown Area), to BLM is another substantial public benefit. This property is the gateway to “The Crown” under BLM ownership. This property is heavily used by recreation users that are largely unaware that it is private land. Loss of this access to The Crown would be disastrous to recreation use in that area.

The “no action” alternative described in the EA is a requirement of this type of analysis. Red Hill Council, however, believes that a no action alternative would be completely inappropriate and ultimately would serve as a public detriment. It is unlikely that the benefits of the proposed exchange could ever be achieved at the level proposed by the Wexner’s. The public would lose the proposed \$1.1 million donation to plan and manage the Sutey Ranch and West Crown area. The extensive and generous conservation easements that will protect wildlife and habitat proposed by the

Wexner's would evaporate. This is an opportunity that should be aggressively pursued by the Bureau of Land Management because of the tremendous public value that will be achieved through the exchange.

The discussion of the minerals in the EA on pages 3-131 and 3-132 does not indicate that BLM would withdraw the minerals acquired from the Sutey Ranch. The SRMA for Red Hill specifies no surface occupancy for mineral extraction. Similarly, the Sutey Ranch should not be available for mineral extraction purposes, so BLM should take the extra step to eliminate mineral extraction as an option on the ranch because of its important wildlife, conservation and recreation characteristics.

The land exchange is a net benefit to the public environmentally, financially and for recreation. The fact that Garfield County gains some new public lands and Pitkin County loses some public lands in this exchange is largely irrelevant due to the arbitrary nature of the county boundaries in relation to the geography of the Roaring Fork Valley. Since 1984, Pitkin County has benefited from a net gain of public land through various exchanges. Pitkin County has increased public lands within its boundaries through public land exchanges by 11 square miles (7,026 square acres). However, the public lands in question are lands that benefit all citizens of the United States whether they are in Pitkin, Eagle or Garfield counties. That should be a primary consideration of the Bureau of Land Management in this exchange.

The Red Hill Council looks forward to working closely with BLM and other agencies in preparing a management plan for the Sutey Ranch property. It is our belief that the environmental, wildlife and recreational values of these lands can coexist without detriment through a carefully considered planning process that incorporates broad-based public involvement and input. We look forward to being part of that public process.

Thank you for the opportunity to offer our comments on the Sutey Ranch Land Exchange Environmental Assessment Number BLM-CO-040-2013-0061-EA.

Sincerely,



Davis Farrar

Red Hill Council - President