

**TOWN OF MOUNTAIN VILLAGE
TOWN COUNCIL REGULAR MEETING
THURSDAY JUNE 14, 2018, 8:30 AM
2nd FLOOR CONFERENCE ROOM, MOUNTAIN VILLAGE TOWN HALL
455 MOUNTAIN VILLAGE BLVD, MOUNTAIN VILLAGE, COLORADO
AGENDA**

	Time	Min	Presenter	Type	
1.	8:30				Call to Order
2.	8:30	30	Reed/Mahoney	Legal	Executive Session for the Purpose of Receiving Legal Advice Pursuant to C.R.S. 24-6-402(b), and for the Purpose of Negotiations Pursuant to C.R.S. 24-6-402(4)e
3.	9:00	5			Break
4.	9:05	5			Public Comment on Non-Agenda Items
5.	9:10	5	Johnston	Action	Consideration of Approval of Minutes: a. May 17, 2018 Regular Town Council Meeting P. 3 b. May 31, 2018 Special Town Council Meeting P. 7
6.	9:15	15	Johnston	Action <i>Quasi-Judicial</i>	Town Council Acting as the Liquor Licensing Authority: a. Consideration of an Application for a Special Event Liquor Permit by Telluride Wine Festival Foundation for Wine Seminars at the Great Room at the Ridge Club on June 28-30, 2018 from 8:00 a.m. to 9:00 p.m. P. 9 b. Consideration of an Application for Special Event Liquor Permits by Telluride Arts for the Art & Architecture Event at Five Locations in Mountain Village on July 22, 2018 from 11:00 a.m. to 6:00 p.m. P. 22
7.	9:30	5	Broady	Action	Consideration to Impose an Open Fire Restriction P. 39
8.	9:35	10	Haynes	Action <i>Quasi-Judicial</i>	Second Reading, Public Hearing and Council Vote on an Ordinance Approving a Community Development Code (CDC) Amendment to CDC Section 17.5.6.C.3. Roof Material pursuant to CDC Section 17.1.7 Amendments to the Community Development Code P. 43
9.	9:45	15	Starr	Action <i>Quasi-Judicial</i>	Consideration of a Resolution to Approve a Major Scale Subdivision for Lot 151R per Community Development Code Section 17.4.13.E.2 P. 53
10.	10:00	15	Starr	Action <i>Quasi-Judicial</i>	First Reading, Setting of a Public Hearing and Council Vote on an Ordinance Approving (1)a Rezone of Lot 151R From Multi-Family to Single-Family (2) Changing Four Condominium Unit Designations to Three Single Family Unit Designations to be Assigned to Each Replatted Lot (Lot 151A, Lot 151B and Lot 151C) per Community Development Code Sections 17.4.9 & 17.4.10 P. 86
11.	10:15	15	Starr	Action <i>Quasi-Judicial</i>	Consideration of a Resolution Approving a Conditional Use Permit to Allow a Mining Sluice, and Trampoline on Lot OS 3X, Heritage Plaza P. 101
12.	10:30	10	Starr	Action <i>Quasi-Judicial</i>	Consideration of a Resolution Approving a Conditional Use Permit to Allow a Ropes Course on Lot OS 3U P. 115
13.	10:40	30	Bikis Kjome	Informational	Drought Condition Update
14.	11:10	20	Tuddenham	Action	Sheep Mountain Alliance Requests: P. 126 a. Consideration of Approval of a Letter of Support for the GMUG Grand Mesa-Gunnison-Uncompahgre National Forests Wilderness Recommendations made by SMA, the Wilderness Society and Other Groups b. Consideration of Approval of a Letter of Support of the San Juan Mountain Wilderness Bill

15.	11:30	15	Mahoney	Action	Consideration of Approval of a Policy Addressing Public Comment P. 261
16.	11:45	15	Skinner	Informational	Colorado Flights Alliance Bi-Annual Report P. 264
	12:00	30			Lunch
17.	12:30	20	Curry Haynes	Work Session	Discussion Regarding Village Court Apartment Comparative Regional Rents and Possible Incremental Rent Increase of Less Than \$50/Month Effective 2019 and Only Upon Lease Renewal P. 277
18.	12:50	20	Diaz	Informational	San Miguel Regional Housing Authority Annual Report P. 283
19.	1:10	20	Bangert	Work Session	Discussion of potential regulations regarding the treatment of dead, diseased and beetle infested trees and an update on Mountain Village Defensible Space Incentive Program P 313
20.	1:30	10	Haynes A Benitez	Informational	Town Hall Subarea Monthly Update
21.	1:40	15	Haynes A Benitez	Informational	Village Center Subarea Monthly Update
22.	1:55	30	Council Members & Staff	Informational	Council Boards and Commissions Updates: a. San Miguel Watershed Coalition-Starr b. Colorado Flights Alliance -Jansen c. Transportation & Parking – MacIntire/Benitez d. Budget & Finance Committee –Caton/Gilbride e. Gondola Committee – Caton/Berry f. Colorado Communities for Climate Action – Berry g. San Miguel Authority for Regional Transportation (SMART)- Benitez/Caton/Binder h. Eco Action Partners – Berry/Binder i. Telluride Historical Museum- Berry j. Telluride Conference Center –MacIntire/Gilbride k. Alliance for Inclusion – Berry l. Green Team Committee- Berry/MacIntire m. Telluride Tourism Board-Jansen n. Mayor’s Update - Benitez
23.	2:25	10	Montgomery	Informational	Staff Reports: a. Town Manager P. 324
24.	2:35	5	Kennefick		Other Business: a. Save the Date: July 19 Tri Gov Dinner b. Save the Date: September 27 CML Regional Dinner
25.	2:40				Adjourn

Please note that times are approximate and subject to change.

jk
06/06/18

Individuals with disabilities needing auxiliary aid(s) may request assistance by contacting Town Hall at 970-369-6429 or email: mvclerk@mtnvillage.org. A minimum advance notice of 48 hours is required so arrangements can be made to locate requested auxiliary aid(s)

**TOWN OF MOUNTAIN VILLAGE
MINUTES OF THE MAY 17, 2018
REGULAR TOWN COUNCIL MEETING **DRAFT**
AGENDA ITEM # 5a**

The meeting of the Town Council was called to order by Mayor Laila Benitez at 8:33 a.m. on Thursday, May 17, 2018 in the Mountain Village Town Hall, 455 Mountain Village Boulevard, Mountain Village, Colorado.

Attendance:

The following Town Council members were present and acting:

Laila Benitez, Mayor
Dan Caton, Mayor Pro Tem
Dan Jansen
Jack Gilbride
Bruce MacIntire
Patrick Berry
Natalie Binder

Also in attendance were:

Kim Montgomery, Town Manager	Robert Stenhammer
Jackie Kennefick, Director of Administration/Town Clerk	Cath Jett
Susan Johnston, Deputy Town Clerk	Greer Garner
Christina Lambert, Administrative Services Coordinator	Banks Brown
David Reed, Town Attorney	Keith Brown
Jim Mahoney, Assistant Town Attorney	Phil Evans
Sarah Abbott, Associate Town Attorney	Pam Bennett
Chris Broady, Police Chief	Karen Guglielmone
Kevin Swain, Finance Director	Anton Benitez
Michelle Haynes, Director of Planning & Development Services	Tim Johnson
Dave Bangert, Planner II/Forester	Mark Buchanan
Sam Starr, Planner	Brandon Davis
Bill Kight, Marketing & Business Development Director	
Sue Kunz, Director of Human Resources	
Finn Kjome, Public Works Director	

Telluride Regional Wastewater Treatment Plant (TRWTP) Master Plan Implementation Update (2)

Town of Telluride Environmental and Engineering Division Manager Karen Guglielmone and Director of Public Works Finn Kjome presented. Council was in support of scheduling a joint meeting the week of June 11th with the Town of Telluride Town Council and other stakeholders to hear the hired consultant's presentation on their financial analysis and directed staff to send out a calendar poll to determine the date. Public comment was received by Pam Bennett.

Executive Session for the Purpose of Receiving Legal Advice Pursuant to C.R.S. 24-6-402(b), and for the Purpose of Negotiations Pursuant to C.R.S. 24-6-402(4)e (3)

On a **MOTION** by Dan Jansen and seconded by Jack Gilbride, Council voted unanimously to enter into Executive Session for the purpose of receiving legal advice pursuant to C.R.S. 24-6-402(b), and for the purpose of negotiations pursuant to C.R.S. 24-6-402(4)e at 9:28 a.m.

Council returned to regular session at 10:33 a.m.

Council took a break from: 10:33 a.m. to 10:41 a.m. (4)

Public Comment on Non-Agenda Items (5)

Public comment was received from Cath Jett regarding the issue of the beavers in The Meadows.

Consideration of Approval of Minutes of the April 26, 2018 Regular Council Meeting (6)

Deputy Town Clerk Susan Johnston presented. On a **MOTION** by Dan Caton and seconded by Jack Gilbride, Council voted unanimously to approve the April 26, 2018 Regular Town Council meeting minutes as presented.

Marketing Telluride Inc. Quarterly Report (7)

President and CEO of Marketing Telluride Inc. Michael Martelon presented the report.

Sheep Mountain Alliance Requests: (8)

a. **Consideration of Approval of a Letter of Support for the GMUG Grand Mesa-Gunnison-Uncompahgre National Forests Wilderness Recommendations made by SMA, the Wilderness Society and Other Groups**

b. **Consideration of Approval of a Letter of Support of the San Juan Mountain Wilderness Bill**
Council discussion ensued. On a **MOTION** by Dan Jansen and seconded by Dan Caton, Council voted unanimously to continue the above items to the June 14, 2018 Town Council meeting.

Discussion on Public Comment Policy (9)

Assistant Town Attorney Jim Mahoney presented. Public comment was received from Cath Jett. Council directed the Town Attorney's office to draft a Public Comment Policy to be considered for approval by Town Council at the June meeting.

Council took a break for lunch from 11:59 p.m. to 12:23 p.m.

Finance: (10)

a. **Presentation of the April 30, 2018 Business & Government Activity Report (BAGAR)**

Director of Finance Kevin Swain presented the BAGAR.

b. **Consideration of Approval of the March 31, 2018 Financials**

Kevin Swain presented. On a **MOTION** by Patrick Berry and seconded by Jack Gilbride, Council voted unanimously to approve the March 31, 2018 Financials as presented.

c. **Goal Setting for 2019 Budget**

Kevin Swain presented. Council discussion ensued. Council defined priorities for the first draft of the budget to be:

- Trails and Recreation
- Technology
- Affordable housing/Village Court Apartments expansion
- Village Center Subarea
- Town Hall Subarea including: road roundabout, road re-alignment, Elk Pond and Park Pond improvements
- Funding for Conference Center (Consultant)

Council moved to agenda item 14.

First Reading, Setting of a Public Hearing and Council Vote on an Ordinance Approving a Community Development Code (CDC) Amendment to CDC Section 17.5.6.C.3. Roof Material pursuant to CDC Section 17.1.7 Amendments to the Community Development Code (11)

Director of Planning and Development Services Michelle Haynes presented. Public comment was received from Design Review Board members Banks Brown and Phil Evans. On a **MOTION** by Dan Caton and seconded by Dan Jansen, Council voted 7-0 to adopt an Ordinance approving a Community Development Code amendment to CDC Section 17.5.6.C.3 Roof Material, pursuant to CDC Section 17.1.7 Amendments to the CDC on first reading and to set the second reading, public hearing and Council vote for June 14, 2018 with an amendment adding the term *non-reflective* solar roof tiles.

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Town Hall Subarea Update (12)

Michelle Haynes and Telluride Mountain Village Owners Association Executive Director Anton Benitez presented.

Village Center Subarea Update (13)

Michelle Haynes and Anton Benitez presented.

Council Boards and Commissions Updates: (14)

- a. **San Miguel Watershed Coalition (SMWC) –Starr**
- b. **Colorado Flights Alliance (CFA) –Jansen**
- c. **Transportation & Parking – MacIntire/Benitez**
- d. **Budget & Finance Committee -Gilbride/Caton**
- e. **Gondola Committee – Caton/Berry**
- f. **Colorado Communities for Climate Action – Berry**
- g. **San Miguel Authority for Regional Transportation (SMART) - Benitez/Caton/Binder**
- h. **Eco Action Partners (EAP)– Berry/Binder**
- i. **Telluride Historical Museum – Berry**
- j. **Telluride Conference Center (TCC) –MacIntire/Gilbride**
- k. **Alliance for Inclusion – Berry**
- l. **Green Team Committee - Berry/MacIntire**
- m. **Telluride Tourism Board - Jansen**
- n. **Mayor’s Update – Benitez**

Council moved to agenda item 11.
Mayor Benitez presented her update and Finn Kjome provided an update on the drought situation and water restrictions. Council directed Mr. Kjome to provide a monthly update until the restrictions are lifted. Council directed staff to agendize a water update in June with Bikis water experts providing the updates.

On a **MOTION** by Dan Jansen and seconded by Jack Gilbride, Council voted unanimously to extend the meeting beyond 6 hours.

Staff Reports: (15)

a. **Police Department**

Police Chief Chris Broady presented his staff report. Council directed staff to issue a press release regarding the Stage 1 fire restrictions that are in effect.

b. **Transit & Recreation**

Director of Transit and Recreation Jim Loebe was unavailable to present the report.

c. **Public Works**

Public Works Director Finn Kjome presented his report. Council directed staff to contact an expert to assess the beaver situation in the Meadows and report their findings at the July 19, 2018 meeting.

d. **Town Manager**

Kim Montgomery presented her report.

Other Business (16)

a. **Council Boards and Commissions Update**

1. **Ethics Commission**

2. **Community Grant Committee**

Town Clerk/Director of Administration Jackie Kennefick presented the upcoming expiration of seats on the above committees per the adopted policy. She noted that the seated committee members have been notified and are interested in continuing on their respective committees. Appointments will be made in July.

There being no further business, on a **MOTION** by Dan Jansen and seconded by Dan Caton, Council voted unanimously to adjourn the meeting at 3:22 p.m.

Respectfully prepared,

Susan Johnston
Deputy Town Clerk

Respectfully submitted,

Jackie Kennefick
Town Clerk

DRAFT

**TOWN OF MOUNTAIN VILLAGE
MINUTES OF THE MAY 31, 2018
REGULAR TOWN COUNCIL MEETING **DRAFT**
AGENDA ITEM # 5b**

The meeting of the Town Council was called to order by Mayor Laila Benitez at 8:31 a.m. on Thursday, May 31, 2018 in the Mountain Village Town Hall, 455 Mountain Village Boulevard, Mountain Village, Colorado.

Attendance:

The following Town Council members were present and acting:

Laila Benitez, Mayor
Dan Caton, Mayor Pro Tem
Dan Jansen
Bruce MacIntire
Patrick Berry
Natalie Binder

Absent:

Jack Gilbride

Also in attendance were:

Kim Montgomery, Town Manager	Banks Brown
Jackie Kennefick, Director of Administration/Town Clerk	Anton Benitez
Susan Johnston, Deputy Town Clerk	Chris Hawkins
Christina Lambert, Administrative Services Coordinator	Tom Kennedy
Jim Mahoney, Assistant Town Attorney	Jim Royer
Chris Broady, Police Chief	Tim Johnson
Michelle Haynes, Director of Planning & Development Services	
Sam Starr, Planner	

Consideration of an Amendment to the February 15th, 2018 Standstill Agreement Between the Town of Mountain Village and Northlight Trust I, to Extend the Application Deadline from June 15, 2018 to September 14, 2018 (2)

Assistant Town Attorney Jim Mahoney presented. Public comment was received by Attorney Tom Kennedy who represents the land owner and also by Jim Royer. On a **MOTION** by Dan Jansen and seconded by Dan Caton, Council voted unanimously to approve an amendment to the February 15th, 2018 Standstill Agreement between the Town of Mountain Village and Northlight Trust I, to extend the application deadline from June 15, 2018 to September 14, 2018.

There being no further business, on a **MOTION** by Dan Caton and seconded by Bruce MacIntire, Council voted unanimously to adjourn the meeting at 8:42 a.m.

Respectfully prepared,

Susan Johnston
Deputy Town Clerk

Respectfully submitted,

Jackie Kennefick
Town Clerk

To: Town Council Acting as the Local Liquor Licensing Authority

From: Deputy Clerk Susan Johnston

Date: 06/06/2018

Re: Consideration of Special Event Applications

Consideration of an Application for a Special Event Liquor Permit by Telluride Wine Festival Foundation for Wine Seminars at the Great Room at the Ridge Club on June 28-30, 2018 from 8:00 a.m. to 9:00 p.m.

All documentation and appropriate fees have been received and applicant meets all special event qualifications. The following departments have reviewed the application: Police, Legal, and Clerk. The required notice was posted on June 1, 2018 and no comments were filed.

Staff recommendation: Motion to approve a Special Event Liquor Permit application by Telluride Wine Festival Foundation for wine seminars at the Great Room at the Ridge Club on June 28-30, 2018 from 8:00 a.m. to 9:00 p.m.

Consideration of an Application for Special Event Liquor Permits by Telluride Arts for the Art & Architecture Event at Five Locations in Mountain Village on July 22, 2018 from 11:00 a.m. to 6:00 p.m.

All documentation and appropriate fees have been received and applicant meets all special event qualifications. The following departments have reviewed the application: Police, Legal, Clerk and Planning. Approval of this permit together with staff approval of the Special Event Application through the Planning Department, grants possession of the Town owned property for the venue located at 620 Mountain Village Blvd. Unit 1B (Wagner Custom Skis). The required notice was posted on June 3, 2018 and no comments were filed.

Staff recommendation: Motion to approve a Special Event Liquor permit application by Telluride Arts for the Art & Architecture event at five locations in Mountain Village on July 22, 2018 from 11:00 a.m. to 6:00 p.m.



**37th Annual
Telluride Wine Festival
June 28th – July 1st**

To Whom it may concern,

We are planning to conduct Wine Tasting seminars again at the 37th Annual Telluride Wine Festival in the Greatroom at the Ridgeclub for the third year.

They will be conducted as follows:

Up to 75 attendees will be seated facing the speakers/sommeliers and in front of them will have up to 8 glasses filled with 1oz of wine all labeled with the name and year of the wine. The attendees will remain seated and taste the wines as directed by the speaker.

Crackers/cheese sticks and at one seminar, cheeses, will be available for consumption.

All places will be provided with one liter of bottled water at each seminar.

Glasses will be cleared and dumped by our 5 volunteers/staff (at the conclusion of each seminar) They will be in attendance at each of the seminars throughout the weekend.

Thank you

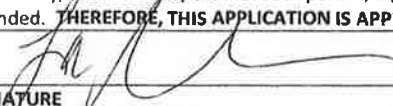
Laurel Robinson
TWF
May 25, 2018

TELLURIDE WINE FESTIVAL
PO BOX 1677 TELLURIDE, CO 81435



TOWN OF MOUNTAIN VILLAGE SPECIAL EVENT LIQUOR PERMIT APPLICATION

This application must be filed with Office of the Town Clerk, Town of Mountain Village, 455 Mountain Village Blvd., Mountain Village, Colorado 81435. Applicant must be a non-profit organization on file with the Colorado Secretary of State.

In order to qualify for a Special Events Permit, you must be a nonprofit and one of the following:							
<input checked="" type="checkbox"/> Social	<input type="checkbox"/> Municipality Owning Arts Facilities						
<input type="checkbox"/> Fraternal	<input type="checkbox"/> Religious Institution						
<input type="checkbox"/> Patriotic	<input type="checkbox"/> Philanthropic Institution						
<input type="checkbox"/> Political	<input type="checkbox"/> Political Candidate						
<input type="checkbox"/> Athletic	<input type="checkbox"/> Chartered Branch, Lodge or Chapter of a National Organization/Society						
Type of Special Event applicant is applying for:							
<input type="checkbox"/> Fermented Malt Beverage (3.2%) \$100/day		<input checked="" type="checkbox"/> Beer, Wine & Liquor \$100/day					
1. Name of Applicant Organization or Political Candidate		State Sales Tax Number (required)					
Telluride Wine Festival Foundation		0047-2023-0000					
2. Mailing Address of Organization or Political Candidate		3. Address of Place Special Event to be held					
PO Box 1677 Telluride, CO 81435		The Great Room at the Ridgeclub					
4. President/Secretary of Organization or Political Candidate							
Name	Date of Birth	Home Address	Phone Number				
Laurel Robinson	12/08/58	42409 Hwy 145 Norwood, CO	970 728 9790				
5. Event Manager Name	Date of Birth	Home Address	Phone Number				
Tine Wright	10/24/67	175 E 93rd St #4H NYC, NY	646 228 5151				
6. Has applicant organization or political candidate been issued a special event permit this calendar year?							
<input type="checkbox"/> Yes		<input checked="" type="checkbox"/> No					
		How many days?					
7. Are premises now licensed under state liquor or beer code?							
<input type="checkbox"/> Yes		<input checked="" type="checkbox"/> No					
		To whom?					
8. Does the applicant have possession or written permission for the use of the premises to be licensed?							
<input type="checkbox"/> Yes		<input checked="" type="checkbox"/> No					
List Below the Exact Date(s) for Which Application Is Being Made For Permit							
Date(s)	June 28, 2018	to	June 30, 2018	Date(s)		to	
Hours	8am	to	9pm	Hours		to	
Date(s)		to		Date(s)		to	
Hours		to		Hours		to	
REPORT AND APPROVAL OF TOWN OF MOUNTAIN VILLAGE LOCAL LICENSING AUTHORITY							
The foregoing application has been examined and the premises, business conducted and character of the applicant are satisfactory, and we do report that such permit, if granted, will comply with the provisions of Title 12, Article 48, C.R.S., as amended. THEREFORE, THIS APPLICATION IS APPROVED.							
				Executive Director		5/25/2018	
SIGNATURE				TITLE		DATE	



TOWN OF MOUNTAIN VILLAGE
SPECIAL EVENT LIQUOR PERMIT APPLICATION
APPLICATION INFORMATION AND CHECKLIST

THE FOLLOWING SUPPORTING DOCUMENTS MUST BE ATTACHED TO THIS APPLICATION FOR A PERMIT TO BE ISSUED:

- Appropriate fee - CHECK PAYABLE TO THE TOWN OF MOUNTAIN VILLAGE
- Diagram of the area to be licensed (not larger than 8 ½" x 11" reflecting bars, walls, partitions, ingress, egress and dimensions
Note: if the event is to be held outside, please submit evidence of intended control, i.e., fencing, ropes, barriers, etc.
- Copy of deed, lease, or written permission of owner for use of the premises
- Certificate of good corporate standing (NONPROFIT) issued by Secretary of State within last two years;
or
- If not incorporated, a NONPROFIT charter; or
- If a political candidate, attach copies of reports and statements that were filed with the Secretary of State.

- Application must be submitted to the Town of Mountain Village at least thirty (30) days prior to the event.
- The premises to be licensed must be posted at least ten (10) days before a hearing can be held. (12-48-106 C.R.S.)

(12-48-102 C.R.S.)

A Special Event Permit issued under this article may be issued to an organization, whether or not presently licensed under Articles 46 and 47 of this title, which has been incorporated under the laws of this state for the purpose of a social, fraternal, patriotic, political or athletic nature, and not for pecuniary gain or which is a regularly chartered branch, lodge or chapter of a national organization or society organized for such purposes and being nonprofit in nature, or which is a regularly established religious or philanthropic institution, and to any political candidate who has filed the necessary reports and statements with the secretary of state pursuant to Article 45 of Title 1, C.R.S. a Special Event Permit may be issued to any municipality owning arts facilities at which productions or performances of an artistic or cultural nature are presented for use at such facilities.

If an event is cancelled, the application fees and the day(s) are forfeited.



TOWN OF MOUNTAIN VILLAGE
SPECIAL EVENT LIQUOR LICENSE PERMIT APPLICATION
ADDENDUM *Please answer all of the following questions.*

Describe the event and the target market.

The mission of the Telluride Wine Festival is to introduce and educate its guests to extraordinary good and wine through tastings and seminars in an amazing setting.

How many people are you expecting per day? 50-75

Will you be serving alcoholic beverages? yes

Are alcoholic beverages included in the event price? yes

Will alcohol be sold by the drink? no

What type of alcoholic beverages are you planning on selling/serving?

1-4 oz pours of multiple samples of wine will be served per seminar. 2-3 seminars per day.

Will you be selling/serving food items? yes

What type of food items will be sold or served?

Crackers for Palate Cleansing.

Will you be cooking food and if cooking food, will you use propane?

no



**TOWN OF MOUNTAIN VILLAGE
SPECIAL EVENT LIQUOR LICENSE PERMIT APPLICATION
ADDENDUM** *Please answer all of the following questions.*

Will you have amplified sound or live music inside or outside? no

Will there be tents/awnings? no

Describe your security plans for this event.

We will have one point of entry and exit.

Describe the type of training security personnel will have prior to the event.

Staff and volunteers with prior experience with Festival Security.

How will you insure compliance with beer/liquor laws, such as: no service to minors or visibly intoxicated persons, no service outside of designated premises, no service before or after hours designated for the event, etc.

Guests will have wristbands. ID's will be checked when tickets are redeemed for wristbands. No minors will be allowed in event. Dump station will be at the exit.

Do you have an emergency plan for the event? If yes, please describe in detail.

Call 911. Both Fire and EMS Departments are aware of this event.



TOWN OF MOUNTAIN VILLAGE
SPECIAL EVENT LIQUOR LICENSE PERMIT APPLICATION
OATH OF APPLICANT *Please initial each of the following statements.*

I understand that as the promoter of the event, that both the non-profit and the server can be charged criminally for alcohol violations under permit. I also understand that the non-profit can be held responsible for any tax liabilities generated by the alcohol permitted event.

I understand that I must allow open access to all town personnel (i.e., Police, Fire, Community Development, etc.) at this event, even if it is deemed a private function. Further, due to health and safety concerns, I understand that other town departments, as a result of circulation of this city application, may have additional requirements resulting in other costs for my special event.

I understand that if this permit is denied, the Town of Mountain Village assumes no liability for expenses incurred by the applicant.

I understand that if during the course of the event, the town determines there is a public safety hazard or if there is a violation of any permit condition, the event will be terminated immediately. The Town of Mountain Village is not responsible for any expenses incurred by the permit holder. Failure to meet the requirements of this permit may provide basis for denial of future permits for a given event, event manager or sponsor.

I understand that only non-profit entities that are properly formulated with the State of Colorado may apply for special event liquor permits, and they may only apply if the permit application and all attachments are filed at least 30 days before the event per state law. In addition, non-profits are required to have: i) state sales tax number from Colorado Department of Revenue, ii) Certificate of Good Standing for their non-profit from Colorado Secretary of State's office, and iii) Town of Mountain Village business license and sales tax number from Mountain Village Finance Department.

I declare under penalty of perjury in the second degree that this application and all attachments are true, correct and complete to the best of my knowledge. I also acknowledge that it is my responsibility and the responsibility of my agents and employees to comply with the provisions of the Colorado Liquor and Beer Code and Regulations and all Town of Mountain Village rules, regulations, ordinances and codes that affect my license.

Laurel M Robinson
Authorized Signature

5/8/18
Date

LAUREL M ROBINSON
Print Name

Director
Title

Ridge Great Room Lease 2018

This Lease Agreement (this "Lease") is made effective as of May 16, 2018 by and between Coonskin Ridge Cabin Lot, LLC ("Landlord"), and Telluride Wine Festival Foundation ("Tenant").

The parties agree as follows:

1. PREMISES. Landlord, in consideration of the provisions provided in this Lease, leases to Tenant the Great Room only portion of Unit 2, Lot 161A-1R Building located at 2 Coonskin Ridge Lane, Mountain Village, Colorado ("Premises").

2. TERM.

2.1 Set Up and Take Down Term. For set up and take down purposes only, the lease term for the Great Room will begin on Wednesday June 27 at 10am Mountain Time and will terminate on Sunday July 1st at 5 PM Mountain Time. Take down and caterer cleanup must occur within this period or an additional \$500.00 per day or portion thereof will be due.

2.2 Function Term. The function will begin on June 28th, 2018 at 5PM Mountain Time and will terminate on June 30, 2018 at 5PM Mountain Time.

3. RENT AMOUNTS, PAYMENTS AND ADJUSTMENTS.

3.1 Lease Rent. The rental payments to be made by Tenant to Landlord under this Lease shall consist of Base Rent and Additional Rent, as set forth below. For purposes of this Lease, the term "Rent" shall refer to Base Rent and Additional Rent.

3.2 Lease Agreement. The Base Rent for this Lease shall be \$0.00. Base Rent shall be paid concurrently with the execution of this lease.

3.3 Additional Rent. : As part of the lease agreement, TWF will clean large window and carpet and provide VIP tickets to "Friends of Steve Estes", along with product as negotiated.

4. USE OF PREMISES. Tenant shall occupy and use the Premises only for Wine Tasting Seminars.

5. INDEMNIFICATION. Tenant shall indemnify, defend and hold Landlord, the owners of the condominium units

located in the Building ("Condo Owners") and the Lot 161A-1R Building Owners, Inc. ("Building HOA"), their respective owners, officers, directors, agents and employees harmless from and against any and all claims, actions, damages, liability, and expense in connection with loss of life, personal injury, theft or damage to property, the Premises or its contents incurred by Landlord or any person or entity occurring in or about, or arising out of Tenant's use of the Premises, Building, common areas and adjacent sidewalks and loading platforms or areas, occasioned wholly or in part by any act or omission of Tenant, or Tenant's agents, employees, licensees, guests, contractors or invitees (or any other person using the Premises with Tenant's consent, whether express or implied), including, without limitation, payment of all costs, expenses, and reasonable attorneys' fees incurred or paid by Landlord in connection with related litigation, but excluding any negligence or intentional misconduct by Landlord, Condo Owners or the Building HOA or their respective owners, officers, directors, agents or employees.

5.1 DAMAGES. Tenant shall be responsible for all claims, actions, damages, liability, and expense in connection with loss of life, personal injury, theft or damage to property, the Premises or its contents incurred by Landlord or any person or entity using the Premises with Tenant's consent, whether express or implied, and occurring in or about, or arising out of Tenant's use of the Premises, Building, common areas and adjacent sidewalks and loading platforms or areas, but excluding any negligence or intentional misconduct by Landlord, Condo Owners or the Building HOA or their respective owners, officers, directors, agents or employees.6

6. NOTICE. Any notice given or served by either party to or on the other shall be deemed to have been duly given or served only if done in writing and either personally delivered or forwarded by certified or registered mail, or nationally-recognized overnight courier, postage prepaid, faxed or emailed to the respective addresses hereinafter set forth. Any such notice shall be deemed given effective the date of personal delivery or fax or email or three days after mailing, as the case may be. Such addresses may be changed from time to time by either party by serving notice as above provided. Landlord also agrees to accept payment of Rent at the address specified pursuant to this Section.

<p>Landlord: Coonskin Ridge Cabin Lot, LLC c/o Steve Estes P.O. Box 6 Telluride, CO 81435 Tele: 970-708-1515 Email: estessteve@theridgeattelluride.com</p>	<p>Tenant: Telluride Wine Festival c/o Laurel Robinson P.O. Box 1677 Telluride, CO. 81435 970-728-9790 laurel@telluridewinefestival.com</p>

7. ENTIRE AGREEMENT/AMENDMENT. This Lease Agreement contains the entire agreement of the parties and there are no other promises or conditions in any other agreement whether oral or written. This Lease may be modified or amended in writing, if the writing is signed by all parties.

8. SEVERABILITY. If any portion of this Lease shall be held to be invalid or unenforceable for any reason, the remaining provisions shall continue to be valid and enforceable. If a court finds that any provision of this Lease is invalid or unenforceable, but that by limiting such provision it would become valid and enforceable, then such provision shall be deemed to be written, construed, and enforced as so limited.

. RESTROOMS. The only restrooms available for the function are the public restrooms located outside the gondola terminal. No restrooms are provided within the Ridge building or the Premises pursuant to this lease; however restrooms may be provided pursuant to the lease of the Ridge Club.

10. GOVERNING LAW. The laws of the State of Colorado shall govern the validity, performance and enforcement of this Lease. Should either party institute legal suit or action for enforcement of any obligation contained herein, it is agreed that the venue of such suit or action shall be appropriate only in San Miguel County, Colorado, and the parties expressly consents to this designation of the venue of any such suit or action.

11. PETS. No dogs or pets will be allowed to attend the event.

12. ACCESS BY LANDLORD TO PREMISES. Landlord shall have the right to enter the Premises at all times during the lease term to make inspections, provide necessary services or for any purpose connected with the management of the Premises. Landlord may enter the Premises without prior notice to Tenant and without Tenant's consent.

- 13. ASSIGNABILITY/SUBLETTING. Tenant may not assign or sublease any interest in the Premises.
- 14. ALTERATIONS. Tenant may not make any alterations of any nature to the Premises or attach anything to any wall without the prior written consent of Landlord which consent may be withheld for any reason or no reason at all.
- 15. PARKING. Landlord shall not provide parking for use by Tenant.
- 16. SURRENDER AND HOLDING OVER. Tenant, upon expiration of this Lease, shall peaceably surrender to Landlord the Premises in good condition and in good repair, subject to cleaning which shall be paid for by Tenant.
- 17. COSTS AND ATTORNEYS' FEES. In any action or proceeding under this agreement, the prevailing party shall recover its costs, fees and expenses in connection therewith, including reasonable attorneys' fees.
- 18. LIMITATION ON ADDITIONS. Tenant may not bring any furniture, equipment or other property into the Premises except for the following: TABLES AND CHAIRS, FANS,
- 19. EVENT INSURANCE. **ON OR BEFORE 30 DAYS PRIOR TO EVENT** Tenant shall provide Landlord with proof of event insurance for a minimum of \$1,000,000 in a form and from an insurer acceptable to Landlord. The insurance shall name (i) Coonskin Ridge Cabin Lot, LLC, (ii) Lot 161A-1R Building Owners, Inc., (iii) The Ridge at Telluride Homeowners Association, Inc., and (iv) The Ridge Club At Telluride, Inc. as additional insureds. The proof of insurance shall also provide that it will not be canceled without thirty (30) day prior written notice to Landlord.

Address for the additional insureds is – PO Box 518, Telluride CO 81435

Tenant

 Laurel Robinson May 25, 2018

 Coonskin Ridge Cabin Lot, LLC

By: Steve Estes
 Steve Estes, Manager

By: [Signature]
 for Telluride Wine Festival

May 25, 2018

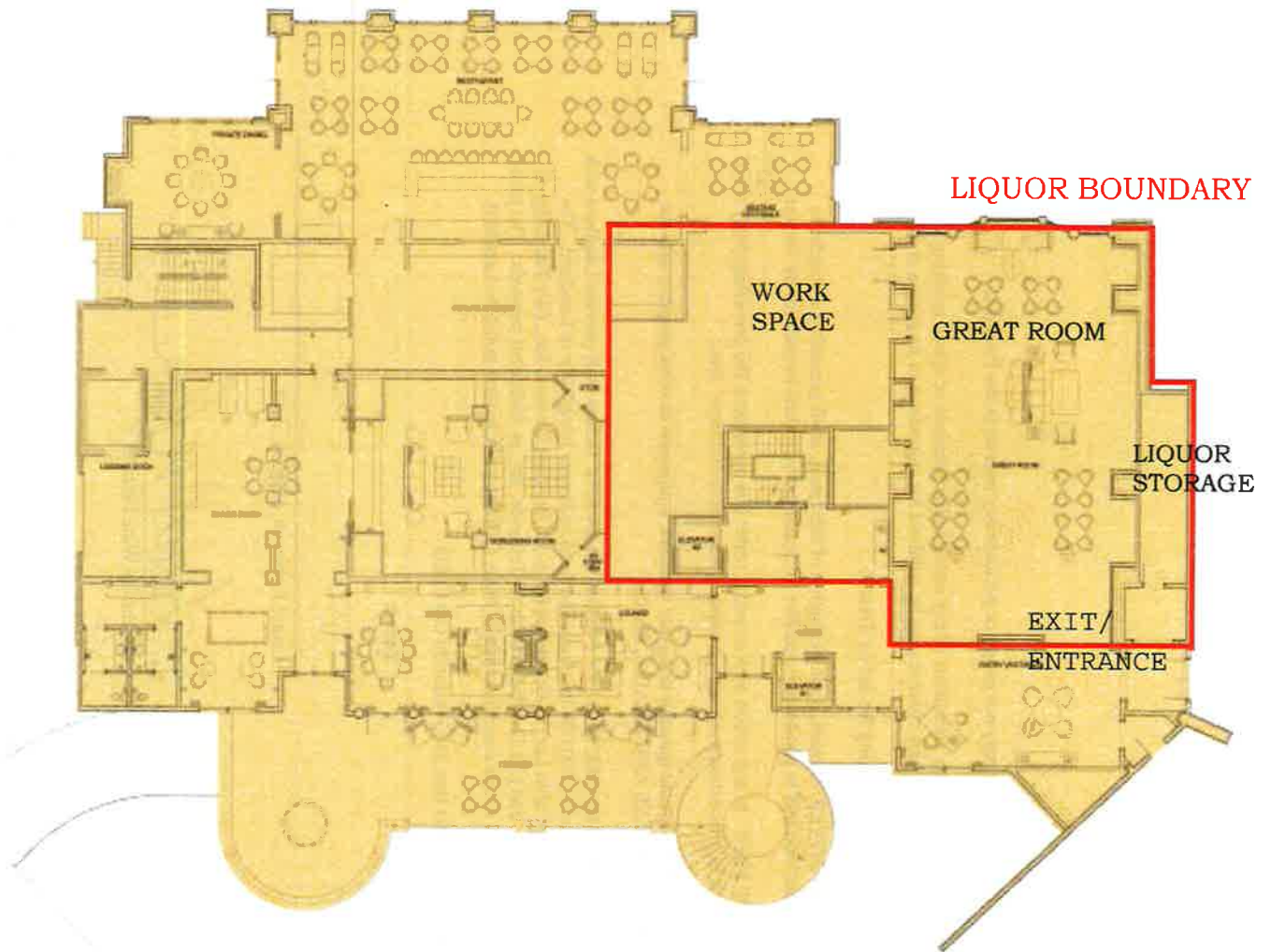
The undersigned Director acknowledges receipt of a copy of this lease.

 Print Name

The Ridge

Post Office Box 518 • 128 South Oak Street
Telluride, Colorado 81435
(970)728-6661 • fax (970)728-8315
www.theridgeatelluride.com

SECOND FLOOR
TELLURIDE WINE FESTIVAL
JUNE 28-JUNE 30
GREAT ROOM USE



OFFICE OF THE SECRETARY OF STATE
OF THE STATE OF COLORADO

CERTIFICATE OF FACT OF GOOD STANDING

I, Wayne W. Williams, as the Secretary of State of the State of Colorado, hereby certify that, according to the records of this office,

telluride wine festival FOUNDATION

is a

Nonprofit Corporation

formed or registered on 06/22/2015 under the law of Colorado, has complied with all applicable requirements of this office, and is in good standing with this office. This entity has been assigned entity identification number 20151400682 .

This certificate reflects facts established or disclosed by documents delivered to this office on paper through 05/25/2018 that have been posted, and by documents delivered to this office electronically through 05/29/2018 @ 15:05:56 .

I have affixed hereto the Great Seal of the State of Colorado and duly generated, executed, and issued this official certificate at Denver, Colorado on 05/29/2018 @ 15:05:56 in accordance with applicable law. This certificate is assigned Confirmation Number 10926023 .



A handwritten signature in blue ink that reads "Wayne W. Williams".

Secretary of State of the State of Colorado

*****End of Certificate*****
Notice: A certificate issued electronically from the Colorado Secretary of State's Web site is fully and immediately valid and effective. However, as an option, the issuance and validity of a certificate obtained electronically may be established by visiting the Validate a Certificate page of the Secretary of State's Web site, <http://www.sos.state.co.us/biz/CertificateSearchCriteria.do> entering the certificate's confirmation number displayed on the certificate, and following the instructions displayed. Confirming the issuance of a certificate is merely optional and is not necessary to the valid and effective issuance of a certificate. For more information, visit our Web site, <http://www.sos.state.co.us/> click "Businesses, trademarks, trade names" and select "Frequently Asked Questions."

INTERNAL REVENUE SERVICE
P. O. BOX 2508
CINCINNATI, OH 45201

DEPARTMENT OF THE TREASURY

Date: **SEP 07 2017**

TELLURIDE WINE FESTIVAL FOUNDATION
C/O LAUREL ROBINSON
PO BOX 1677
TELLURIDE, CO 81435-1677

Employer Identification Number:
47-4340692
DLN:
17053152344007
Contact Person:
JOSEPH LAUX ID# 31077
Contact Telephone Number:
(877) 829-5500
Accounting Period Ending:
December 31
Public Charity Status:
509(a)(2)
Form 990/990-EZ/990-N Required:
Yes
Effective Date of Exemption:
June 22, 2015
Contribution Deductibility:
Yes
Addendum Applies:
No

Dear Applicant:

We're pleased to tell you we determined you're exempt from federal income tax under Internal Revenue Code (IRC) Section 501(c)(3). Donors can deduct contributions they make to you under IRC Section 170. You're also qualified to receive tax deductible bequests, devises, transfers or gifts under Section 2055, 2106, or 2522. This letter could help resolve questions on your exempt status. Please keep it for your records.

Organizations exempt under IRC Section 501(c)(3) are further classified as either public charities or private foundations. We determined you're a public charity under the IRC Section listed at the top of this letter.

If we indicated at the top of this letter that you're required to file Form 990/990-EZ/990-N, our records show you're required to file an annual information return (Form 990 or Form 990-EZ) or electronic notice (Form 990-N, the e-Postcard). If you don't file a required return or notice for three consecutive years, your exempt status will be automatically revoked.

If we indicated at the top of this letter that an addendum applies, the enclosed addendum is an integral part of this letter.

For important information about your responsibilities as a tax-exempt organization, go to www.irs.gov/charities. Enter "4221-PC" in the search bar to view Publication 4221-PC, Compliance Guide for 501(c)(3) Public Charities, which describes your recordkeeping, reporting, and disclosure requirements.

Letter 947

TELLURIDE WINE FESTIVAL FOUNDATION

Sincerely,

Stephen a. martin

Director, Exempt Organizations
Rulings and Agreements

Letter 947

DOC# - 201514 00682



Regarding Special Event Liquor Application for Mountain Village,

Telluride Arts is a 501(c)3 non-profit organization established in 1971, and incorporated in 1974. Our mission is to sustain, promote and expand a culture of the arts in the Telluride Arts District, which includes Mountain Village.

This is Art + Architecture’s 5th year, bringing together the chefs, designers, architects, artists and creative entrepreneurs of our community a weekend to showcase, sell and try out new, innovative creations. It takes place the week of July 16-22nd with free events ranging from a Vaudeville show to storytelling and lectures to a musical performance by the Colorado-native family band [SHEL](#). And the ticketed portion of the week is the [Home Tour](#), where 400 people buy a pass to see some amazing design and architecture in our community, with local chefs and artists dazzling the patrons with their creativity and hard work. After doing a master plan for Telluride Arts in 2011, we found much of the creativity in Telluride revolves around more than just your typical “artist” and we wanted to create an event that would [showcase all aspects of art in our mountain community](#).

The Mountain Village tour occurs on Sunday July 22nd, 2018 between 11:30 am – 5 PM. We are partnering with Telluride Express to shuttle all participants between venues. We do not condone or actually discourage any personal vehicles to be used during the event due to the nature of the event and parking issues.

We are so ecstatic to bring this event to the Mountain Village this year and hope to bring it back for years to come. The partnership with the Village has already been seamless and beneficial to our organization.

Appreciatively,

Meghann McCormick
Director for Art + Architecture



TOWN OF MOUNTAIN VILLAGE SPECIAL EVENT LIQUOR PERMIT APPLICATION

This application must be filed with Office of the Town Clerk, Town of Mountain Village, 455 Mountain Village Blvd., Mountain Village, Colorado 81435. Applicant must be a non-profit organization on file with the Colorado Secretary of State.

In order to qualify for a Special Events Permit, you must be a nonprofit and one of the following:			
<input checked="" type="checkbox"/> Social	<input type="checkbox"/> Municipality Owning Arts Facilities		
<input type="checkbox"/> Fraternal	<input type="checkbox"/> Religious Institution		
<input type="checkbox"/> Patriotic	<input type="checkbox"/> Philanthropic Institution		
<input type="checkbox"/> Political	<input type="checkbox"/> Political Candidate		
<input type="checkbox"/> Athletic	<input type="checkbox"/> Chartered Branch, Lodge or Chapter of a National Organization/Society		
Type of Special Event applicant is applying for:			
<input type="checkbox"/> Fermented Malt Beverage (3.2%) \$100/day		<input checked="" type="checkbox"/> Beer, Wine & Liquor \$100/day	
1. Name of Applicant Organization or Political Candidate		State Sales Tax Number (required)	
Telluride Arts		84-0712952	
2. Mailing Address of Organization or Political Candidate		3. Address of Place Special Event to be held	
PO Box 152		multiple locations	
4. President/Secretary of Organization or Political Candidate			
Name	Date of Birth	Home Address	Phone Number
Kate Jones	5/23/1968	280 S Mahoney	970.708.8845
5. Event Manager Name	Date of Birth	Home Address	Phone Number
Meghann McCormick	04/14/1984	35 La Mesa Vista Norwood	970.708.7711
6. Has applicant organization or political candidate been issued a special event permit this calendar year?			
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	How many days?	0
7. Are premises now licensed under state liquor or beer code?			
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	To whom?	N / A
8. Does the applicant have possession or written permission for the use of the premises to be licensed?			
<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	See Site Agreements attached	
List Below the Exact Date(s) for Which Application Is Being Made For Permit			
Date(s)	July 22nd	to	
Hours	11 AM	to	6 PM
Date(s)		to	
Hours		to	
REPORT AND APPROVAL OF TOWN OF MOUNTAIN VILLAGE LOCAL LICENSING AUTHORITY			
The foregoing application has been examined and the premises, business conducted and character of the applicant are satisfactory, and we do report that such permit, if granted, will comply with the provisions of Title 12, Article 48, C.R.S., as amended. THEREFORE, THIS APPLICATION IS APPROVED.			
Meghann McCormick		Event Organizer	3/14/2018
SIGNATURE		TITLE	DATE



TOWN OF MOUNTAIN VILLAGE
SPECIAL EVENT LIQUOR PERMIT APPLICATION
APPLICATION INFORMATION AND CHECKLIST

THE FOLLOWING SUPPORTING DOCUMENTS MUST BE ATTACHED TO THIS APPLICATION FOR A PERMIT TO BE ISSUED:

- Appropriate fee - CHECK PAYABLE TO THE TOWN OF MOUNTAIN VILLAGE
- Diagram of the area to be licensed (not larger than 8 ½" x 11" reflecting bars, walls, partitions, ingress, egress and dimensions
Note: if the event is to be held outside, please submit evidence of intended control, i.e., fencing, ropes, barriers, etc.
- Copy of deed, lease, or written permission of owner for use of the premises
- Certificate of good corporate standing (NONPROFIT) issued by Secretary of State within last two years;
or
- If not incorporated, a NONPROFIT charter; **or**
- If a political candidate, attach copies of reports and statements that were filed with the Secretary of State.

- Application must be submitted to the Town of Mountain Village at least thirty (30) days prior to the event.
- The premises to be licensed must be posted at least ten (10) days before a hearing can be held. (12-48-106 C.R.S.)

(12-48-102 C.R.S.)

A Special Event Permit issued under this article may be issued to an organization, whether or not presently licensed under Articles 46 and 47 of this title, which has been incorporated under the laws of this state for the purpose of a social, fraternal, patriotic, political or athletic nature, and not for pecuniary gain or which is a regularly chartered branch, lodge or chapter of a national organization or society organized for such purposes and being nonprofit in nature, or which is a regularly established religious or philanthropic institution, and to any political candidate who has filed the necessary reports and statements with the secretary of state pursuant to Article 45 of Title 1, C.R.S. a Special Event Permit may be issued to any municipality owning arts facilities at which productions or performances of an artistic or cultural nature are presented for use at such facilities.

If an event is cancelled, the application fees and the day(s) are forfeited.



TOWN OF MOUNTAIN VILLAGE
SPECIAL EVENT LIQUOR LICENSE PERMIT APPLICATION
ADDENDUM *Please answer all of the following questions.*

Describe the event and the target market.

Art + Architecture is a ticketed event where we put homes in the Mountain Village on tour with small bites and sips of cocktails for our participants to enjoy.

How many people are you expecting per day? 400

Will you be serving alcoholic beverages? yes

Are alcoholic beverages included in the event price? yes

Will alcohol be sold by the drink? no

What type of alcoholic beverages are you planning on selling/serving?

wine and taster cocktails

Will you be selling/serving food items? serving - included in ticket price

What type of food items will be sold or served?

Small toothpick bites that showcase the chefs' talents

Will you be cooking food and if cooking food, will you use propane?

Yes, and no. Each household will provide use of their kitchen for the event.



TOWN OF MOUNTAIN VILLAGE
SPECIAL EVENT LIQUOR LICENSE PERMIT APPLICATION
ADDENDUM *Please answer all of the following questions.*

Will you have amplified sound or live music inside or outside? no

Will there be tents/awnings? yes for Wagner Plaza, but the alcohol will be contained within fencing provided by Telski.

Describe your security plans for this event.

We have a docent at each home at the door and a volunteer in the kitchen as well to make sure alcohol is not over-consumed on each premise.

Describe the type of training security personnel will have prior to the event.

TIPS training for kitchen manager and all docent have volunteered in years' past

How will you insure compliance with beer/liquor laws, such as: no service to minors or visibly intoxicated persons, no service outside of designated premises, no service before or after hours designated for the event, etc.

All IDs will be checked when ticket is sold and at door for those who appear to be underaged (anyone looking under 30, to be safe.) All kitchen managers will make sure people are tasting and not consuming the drinks at a high level. No service to those who are visibly drunk. Each venue closes at 5 and alcohol will no longer be consumed.

Do you have an emergency plan for the event? If yes, please describe in detail.

We have 5 venue managers and I am the coordinator with an assistant who can help managers if something goes awry. Overall, each venue will have 5-10 volunteers based on their size / complexity.



TOWN OF MOUNTAIN VILLAGE
SPECIAL EVENT LIQUOR LICENSE PERMIT APPLICATION
OATH OF APPLICANT *Please initial each of the following statements.*

I understand that as the promoter of the event, that both the non-profit and the server can be charged criminally for alcohol violations under permit. I also understand that the non-profit can be held responsible for any tax liabilities generated by the alcohol permitted event.

I understand that I must allow open access to all town personnel (i.e., Police, Fire, Community Development, etc.) at this event, even if it is deemed a private function. Further, due to health and safety concerns, I understand that other town departments, as a result of circulation of this city application, may have additional requirements resulting in other costs for my special event.

I understand that if this permit is denied, the Town of Mountain Village assumes no liability for expenses incurred by the applicant.

I understand that if during the course of the event, the town determines there is a public safety hazard or if there is a violation of any permit condition, the event will be terminated immediately. The Town of Mountain Village is not responsible for any expenses incurred by the permit holder. Failure to meet the requirements of this permit may provide basis for denial of future permits for a given event, event manager or sponsor.

I understand that only non-profit entities that are properly formulated with the State of Colorado may apply for special event liquor permits, and they may only apply if the permit application and all attachments are filed at least 30 days before the event per state law. In addition, non-profits are required to have: i) state sales tax number from Colorado Department of Revenue, ii) Certificate of Good Standing for their non-profit from Colorado Secretary of State's office, and iii) Town of Mountain Village business license and sales tax number from Mountain Village Finance Department.

I declare under penalty of perjury in the second degree that this application and all attachments are true, correct and complete to the best of my knowledge. I also acknowledge that it is my responsibility and the responsibility of my agents and employees to comply with the provisions of the Colorado Liquor and Beer Code and Regulations and all Town of Mountain Village rules, regulations, ordinances and codes that affect my license.



Authorized Signature

Meghann McCormick

Print Name

5/14/2018

Date

Event Organizer

Title



**TELLURIDE ART + ARCHITECTURE WEEKEND
JULY 21 + 22 2018
VENUE AGREEMENT**

Date:

To Whom It May Concern,

By the authorized signature below, Telluride Arts (Telluride Council for Arts and Humanities) and Vineet Bhatia ("venue") acknowledge and agree that Telluride Arts has permission to use the venue's location at 135 Palmyra Drive, Mountain Village, CO 81435 as part of Telluride Art + Architecture Weekend for tour on July 21 + 22 2018 at which wine, beer and/or liquor will be served. Telluride Arts is responsible for providing all necessary liquor license information and additional insurance.

In the case that the property is on the market, I agree that there will be no brokers, signage or marketing materials present during the tour.

For Venue:

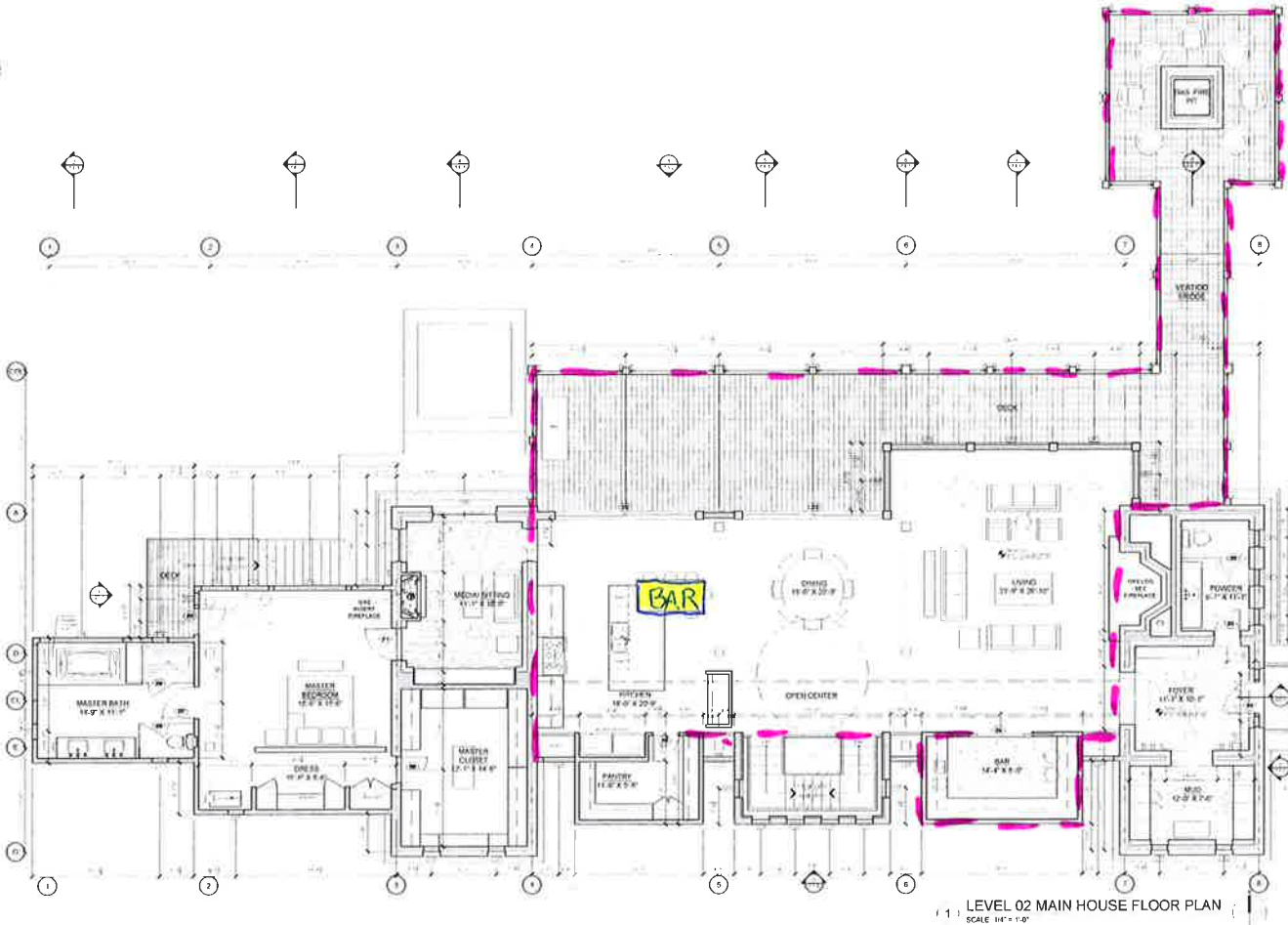
Signature: Vineet Bhatia

Name: Vineet Bhatia (Team Leader / Home Owner)

Date: May 31, 2018

--- perimeter

Bar serving area



SUBMISSIONS

DATE OF SET	11.07.04
CLIENT REVIEW	01.20.05
CLIENT MEETING	02.22.05
PERMITS	03.20.05
STRUCTURAL PROVISIONS	04.09.05
MECHANICAL	04.20.05
FOUNDATION PROVISIONS	04.14.05
FOUNDATION NOTES	04.22.05
BAR FRAM	05.03.05
CONSTRUCTION PERMITS	05.09.05

Bhatia
RESIDENCE
LOT 246
135 PALMYRA LANE
MOUNTAIN
VILLAGE, CO

MAIN HOUSE
LEVEL 02
FLOOR PLAN

A2.3

135 Palmyra Drive



**TELLURIDE ART + ARCHITECTURE WEEKEND
JULY 21 + 22 2018
VENUE AGREEMENT**

Date:

To Whom It May Concern,

By the authorized signature below, Telluride Arts (Telluride Council for Arts and Humanities) and Wagner Custom Skis ("venue") acknowledge and agree that Telluride Arts has permission to use the venue's location at 620 Mountain Village Blvd Unit 1B as part of Telluride Art + Architecture Weekend for tour on July 21 + 22 2018 at which wine, beer and/or liquor will be served. Telluride Arts is responsible for providing all necessary liquor license information and additional insurance.

In the case that the property is on the market, I agree that there will be no brokers, signage or marketing materials present during the tour.

For Venue:

Signature: Pete Wagner

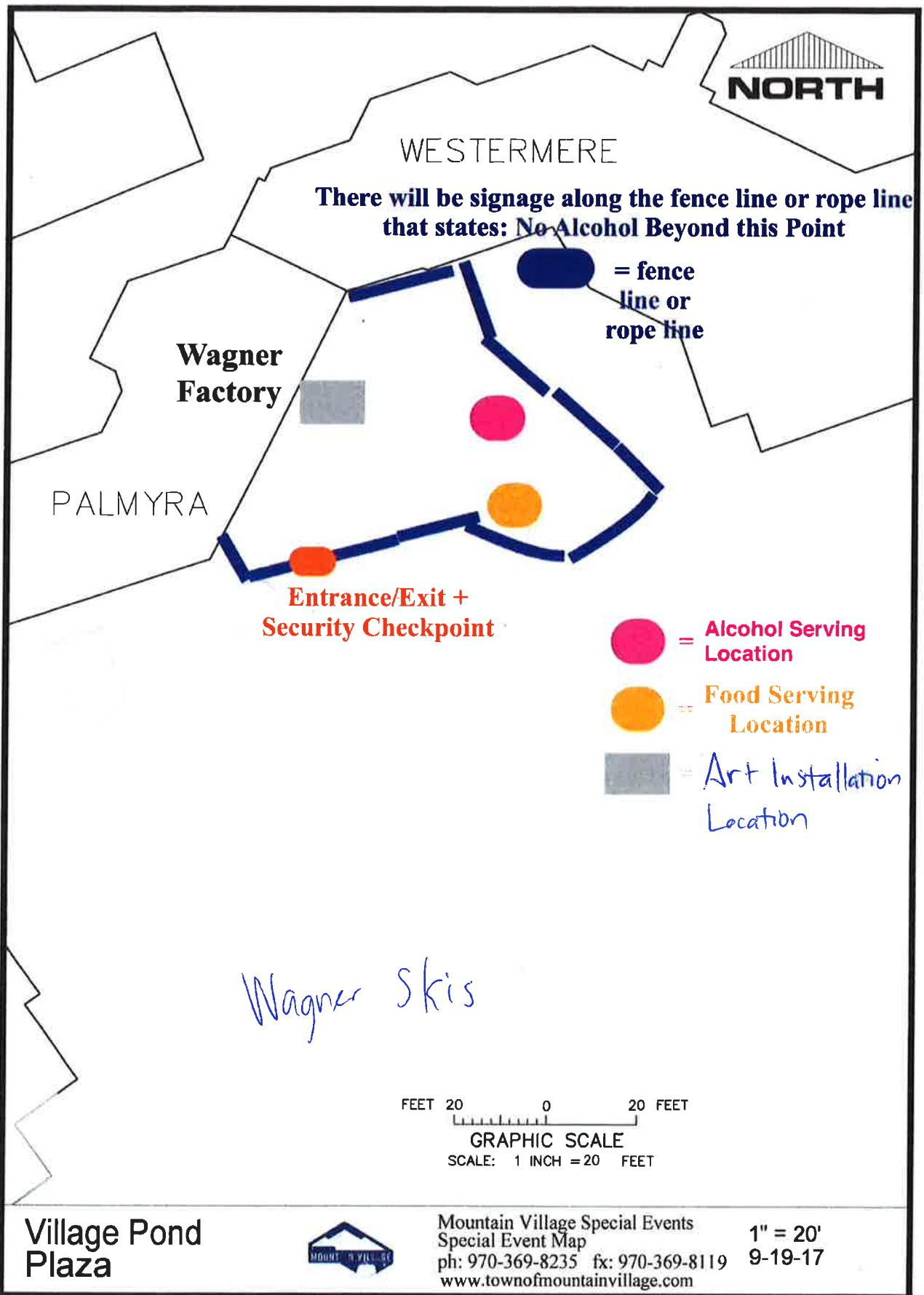
Name: Pete Wagner (Team Leader / Home Owner)

Date: 5/24/2018



TELLURIDE ARTS

PO BOX 152 | 135 WEST PACIFIC AVENUE | TELLURIDE, CO 81435 | 970.728.3930 |
TELLURIDEARTS.ORG





TELLURIDE ART + ARCHITECTURE WEEKEND
JULY 21 + 22 2018
VENUE AGREEMENT

Date: 6/11/2018

To Whom It May Concern,

By the authorized signature below, Telluride Arts (Telluride Council for Arts and Humanities) and ACAX Gittler ("venue") acknowledge and agree that Telluride Arts has permission to use the venue's location at 114 ARIZONA DRIVE as part of Telluride Art + Architecture Weekend for tour on July 21 + 22 2018 at which wine, beer and/or liquor will be served. Telluride Arts is responsible for providing all necessary liquor license information and additional insurance.

In the case that the property is on the market, I agree that there will be no brokers, signage or marketing materials present during the tour.

For Venue:

Signature: 

Name: ACAX Gittler (Team Leader / Home Owner)

Date: 6/11/2018

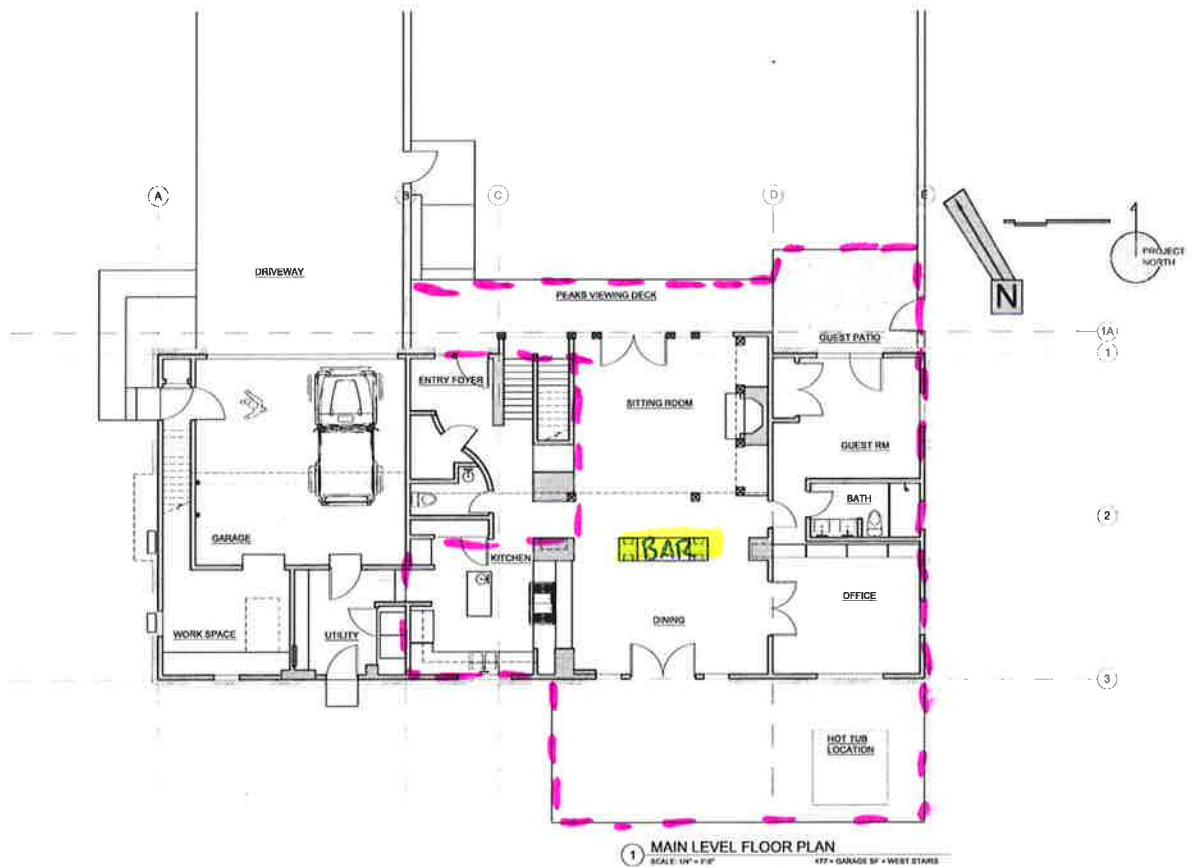


TELLURIDE ARTS

PO BOX 152 | 135 WEST PACIFIC AVENUE | TELLURIDE, CO 81435 | 970.728.3930 | TELLURIDEARTS.ORG

- - - Perimeter

bar serving area



1 MAIN LEVEL FLOOR PLAN
SCALE: 1/4" = 1'-0"
477' - GARAGE SF + WEST STAIRS

HEATED LIVABLE SPACE = 1,765 SF

TRUL ARCHITECTURE
Trulina.com
114 ARIZONA DR.
GITTLER
BUILDING PERMIT SET

SUBMISSIONS:	
CONTRACT	8/16/15
2-D SET	8/16/15
3-D RENDERING	8/16/15
PERMITS	8/16/15
PROPOSAL ONLY	2/1/15
2-D SET	2/1/15
3-D RENDERING	2/1/15
PERMITS	2/1/15

PRINT DATE:
8/17/15

AS-BUILT FLOOR PLANS

A2.1a

114 Arizona Drive



TELLURIDE ART + ARCHITECTURE WEEKEND
JULY 21 + 22 2018
VENUE AGREEMENT

Date:

To Whom It May Concern,

By the authorized signature below, Telluride Arts (Telluride Council for Arts and Humanities) and DAN & LIZ CATON ("venue") acknowledge and agree that Telluride Arts has permission to use the venue's location at 226 ADAMS RANCH RD as part of Telluride Art + Architecture Weekend for tour on July 21 + 22 2018 at which wine, beer and/or liquor will be served. Telluride Arts is responsible for providing all necessary liquor license information and additional insurance.

In the case that the property is on the market, I agree that there will be no brokers, signage or marketing materials present during the tour.

For Venue:

Signature:

Name:

LIZ CATON

(Team Leader / Home Owner)

Date:

5.16.18

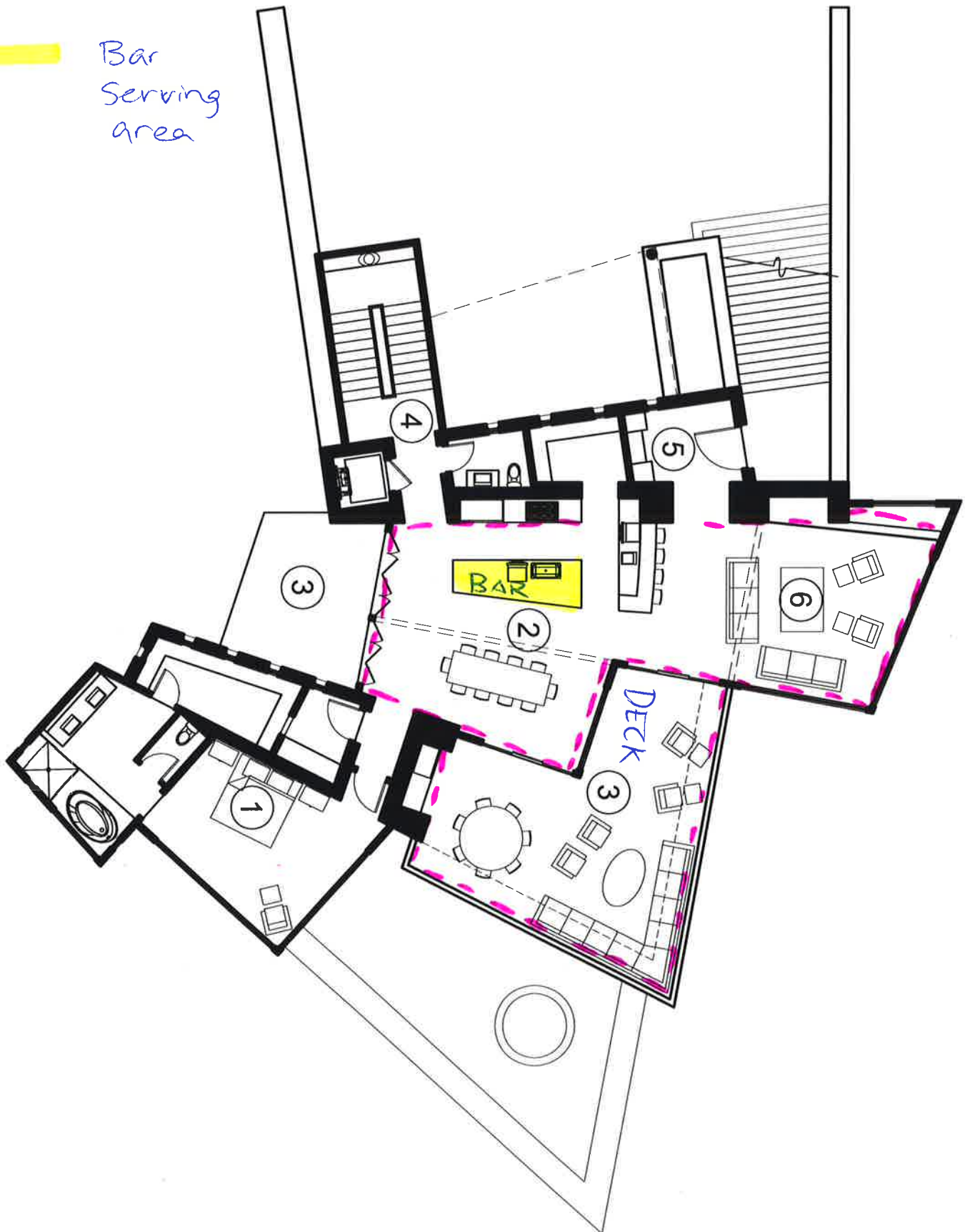


TELLURIDE ARTS

PO BOX 152 | 135 WEST PACIFIC AVENUE | TELLURIDE, CO 81435 | 970.728.3930 | TELLURIDEARTS.ORG

--- perimeter

Bar Serving area





TELLURIDE ART + ARCHITECTURE WEEKEND
JULY 21 + 22 2018
VENUE AGREEMENT

Date:

To Whom It May Concern,

*Mayer
Residence*

By the authorized signature below, Telluride Arts (Telluride Council for Arts and Humanities) and 109 Henry Calder ("venue") acknowledge and agree that Telluride Arts has permission to use the venue's location at 109 Henry Calder as part of Telluride Art + Architecture Weekend for tour on July 21 + 22 2018 at which wine, beer and/or liquor will be served. Telluride Arts is responsible for providing all necessary liquor license information and additional insurance.

In the case that the property is on the market, I agree that there will be no brokers, signage or marketing materials present during the tour.

For Venue:

Signature: [Signature]

Name: Mike Mayer (Team Leader / Home Owner)

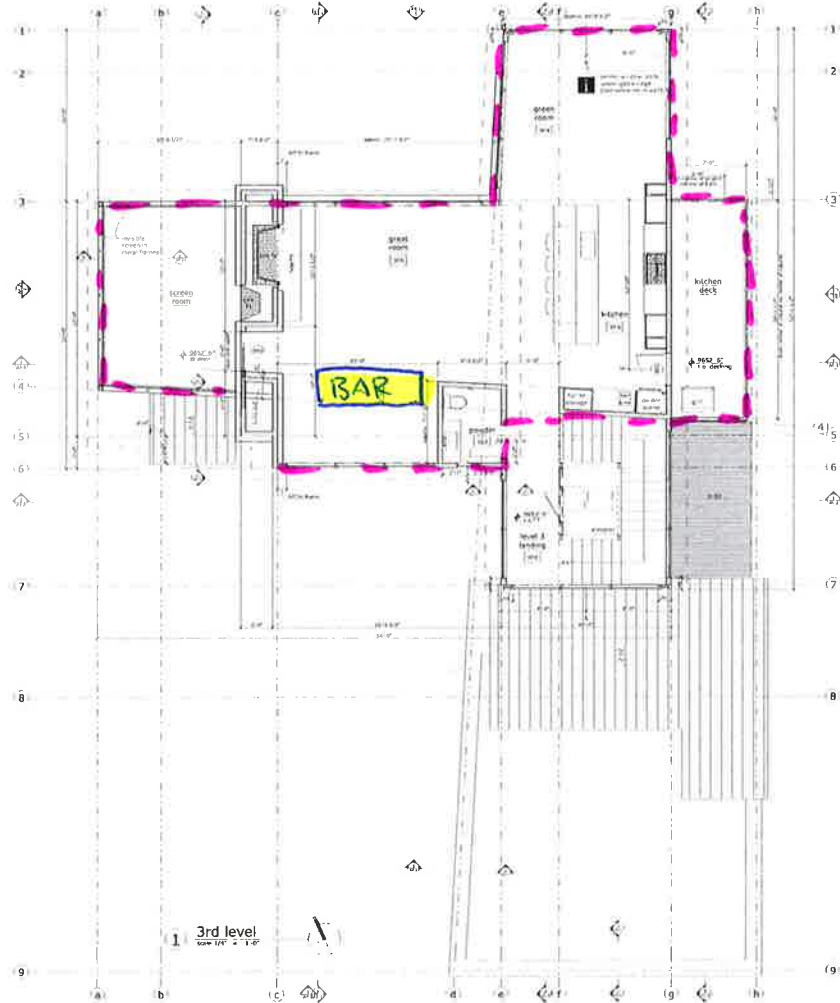
Date: 5/16/18



TELLURIDE ARTS

PO BOX 152 | 135 WEST PACIFIC AVENUE | TELLURIDE, CO 81435 | 970.728.3930 | TELLURIDEARTS.ORG

--- perimeter
 Bar serving area



and architects Inc.
 2000 - 2010 - 2011 - 2012
 2013 - 2014 - 2015 - 2016
 2017 - 2018 - 2019 - 2020

and ARCHITECTS
 2000 - 2010 - 2011 - 2012
 2013 - 2014 - 2015 - 2016
 2017 - 2018 - 2019 - 2020

MAYER RESIDENCE

ISSUE NO: 1
 2024.04.01 - 2024.04.01
 preliminary picking 3/4/2024

Item	Quantity	Unit
Bar	1	unit
Secret room	1	unit
Green room	1	unit
Kitchen	1	unit
Level 3 landing	1	unit

A3.3
 3rd level framing plan

OFFICE OF THE SECRETARY OF STATE
OF THE STATE OF COLORADO

CERTIFICATE OF FACT OF GOOD STANDING

I, Wayne W. Williams, as the Secretary of State of the State of Colorado, hereby certify that, according to the records of this office,

TELLURIDE COUNCIL FOR THE ARTS AND HUMANITIES

is a

Nonprofit Corporation

formed or registered on 04/01/1974 under the law of Colorado, has complied with all applicable requirements of this office, and is in good standing with this office. This entity has been assigned entity identification number 19871270359 .

This certificate reflects facts established or disclosed by documents delivered to this office on paper through 05/18/2018 that have been posted, and by documents delivered to this office electronically through 05/21/2018 @ 14:30:55 .

I have affixed hereto the Great Seal of the State of Colorado and duly generated, executed, and issued this official certificate at Denver, Colorado on 05/21/2018 @ 14:30:55 in accordance with applicable law. This certificate is assigned Confirmation Number 10912014 .



A handwritten signature in blue ink that reads "Wayne W. Williams".

Secretary of State of the State of Colorado

*****End of Certificate*****

Notice: A certificate issued electronically from the Colorado Secretary of State's Web site is fully and immediately valid and effective. However, as an option, the issuance and validity of a certificate obtained electronically may be established by visiting the Validate a Certificate page of the Secretary of State's Web site, <http://www.sos.state.co.us/biz/CertificateSearchCriteria.do> entering the certificate's confirmation number displayed on the certificate, and following the instructions displayed. Confirming the issuance of a certificate is merely optional and is not necessary to the valid and effective issuance of a certificate. For more information, visit our Web site, <http://www.sos.state.co.us/> click "Businesses, trademarks, trade names" and select "Frequently Asked Questions."

June 7, 2018

TOWN COUNCIL REGULAR MEETING THURSDAY JUNE 14, 2018,

Item # 7. Consideration to Impose an Open Fire Restriction

Mayor and Town Council members,

On May 21st, 2018 at 6am, San Miguel County went to Stage 1 fire restrictions. Although conditions were slightly better in the Mountain Village area, I chose, under Mountain Village Municipal Code (MVMC) 8.24.020 Emergency Fire Ban, to also impose an emergency open fire restriction within the incorporated limits of the Town. The ordinance allows for a time period not to exceed thirty (30) days for an emergency restriction, but a restriction for longer than 30 days requires Council consideration and approval.

On Monday June 4, 2018, San Miguel County went into Stage 2 fire restrictions, but the USFS is still at Stage 1 in the forest surrounding the Mountain Village, this may change within the next week as the short and long-range Fire Weather outlook continues to be hot, dry and windy.

I plan to have updated weather outlooks as well as representatives from the Telluride Fire Protection District at the Council meeting to update the current conditions and answer any questions.

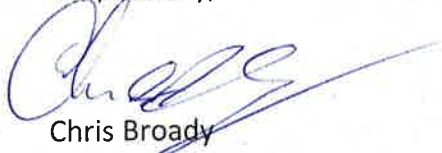
Below is an excerpt from MVMC for your review;

8.24.030 Authority to Impose

In the event the Chief finds it prudent to impose an open fire restriction for longer than thirty (30) days, he/she shall request to Council to impose such a ban. Council may only impose such an extended fire ban or restriction based upon competent evidence received at a duly noticed regular or special meeting of the Council. The Council may exercise such authority upon its determination that the criteria developed by the Colorado State Forest Service regarding the existence of extreme fire conditions have been satisfied. (Ord. No. 02-04 § 2).

Also attached for your reference is the USFS Fire Restriction Definitions (3 pages)

Respectfully,



Chris Broady

Fire Restriction Definitions

Note: Possessing, discharging or using any kind of fireworks or pyrotechnic device is always prohibited on National Forests.

Stage I Restrictions

1. Building, maintaining, attending or using a fire, campfire, charcoal, coal, or wood stove, except within a developed recreation site, or improved site; 36 CFR § 261.52(a). The use of petroleum-fueled stoves, lanterns or heating devices providing such devices meet the fire underwriter's specifications for safety is allowed.
2. Smoking, except within an enclosed vehicle or building, a developed recreation site, or while stopped in an area at least three feet in diameter that is barren or cleared of all flammable material; 36 CFR § 261.52(d).

Exemptions - Pursuant to 36 CFR § 261.50(e), the following persons are exempt from this order:

1. Persons with a Forest Service permit specifically authorizing the prohibited act or omission.
2. Any Federal, State or Local Officer or member of an organized firefighting force in the performance of an official duty.
3. Resident owners and lessees of land, and holders of Forest Service recreation special use authorizations, within the restricted area exempt from Restriction No. 1 above, provided such fires are within a permanent structure.
4. Residents in the area.
5. Persons occupied in a business, trade or occupation in the area.

Fire Restriction Definitions

Stage II Restrictions

1. Building, maintaining, attending or using a fire, campfire, charcoal, coal, or stove fire, except within a developed recreation site, or improved site; 36 CFR § 261.52(a).
2. Smoking; 36 CFR § 261.52(c).
3. Using an explosive; 36 C.F.R. § 261.52(b).
4. Discharging a firearm, air rifle or gas gun; 36 C.F.R § 261.58 (m)
5. Operating a chainsaw, or other equipment powered by an internal combustion engine, is prohibited from times designated in the specific closure order 36 C.F.R. § 261.52(h).
6. Operating or using any internal or external combustion engine without a spark arresting device properly installed, maintained, and in effective working order meeting either:
 - Department of Agriculture, Forest Service Standard 5100-1a; or
 - Appropriate Society of Automotive Engineers (SAE recommended practice J335 (b) and J350 (a); 36 C.R.R. § 261.52(j)
7. Welding or operating acetylene or other torch with open flame; 36 C.F.R. § 261.52(i).
8. Possessing or using a motor vehicle off National Forest System roads, except when parking in an area devoid of vegetation within 10 feet of the roadway; and except for parking overnight in Forest Service developed campgrounds and trailheads. 36 C.F.R. § 261.56,
9. Violating any state law, specifically [*reference actual state [not county] statute or Order*], concerning burning, fires, or which is for the purpose of preventing or restricting the spread of fire; 36 C.F.R. § 261.52. (k).

Exemptions - Pursuant to 36 CFR § 261.50(e), the following persons are exempt from this order:

1. Persons with a Forest Service permit specifically authorizing the prohibited act or omission.
2. Any Federal, State or Local Officer or member of an organized firefighting force in the performance of an official duty.
3. Resident owners and lessees of land, and holders of Forest Service recreation special use authorizations, within the restricted area exempt from Restriction No. 1 above, provided such fires are within a permanent structure.
4. Residents in the area.
5. Persons occupied in a business, trade or occupation in the area.
6. Persons utilizing petroleum-fueled stoves, lanterns or heating devices providing such devices meet the fire underwriter's specifications for safety.

Fire Restriction Definitions

Stage III Restrictions

1. Going into or being upon the restricted area. 36 CFR§ 261.52(e).

Exemptions - Pursuant to 36 CFR § 261.50(e), the following persons are exempt from this order:

1. Persons with a Forest Service permit specifically authorizing the prohibited act or omission.
2. Any Federal, State or Local Officer, or member of an organized firefighting force in the performance of an official duty.
3. Residents in the area accessing private property via a closed Forest Service road.
4. Persons occupied in a business, trade or occupation in the area as specifically authorized.
5. Persons visiting recreations sites, trails, roads, and areas described as open below.

Stage IV Restrictions

1. Going into or being upon the restricted area – 36 CFR 261.52(e).

Exemptions - Pursuant to 36 CFR 261.50(e), the following persons are exempt from this order:

1. Persons with a Forest Service permit that specifically authorizing the otherwise prohibited act or omission.
2. Any federal, state or local officer or member of an organized rescue or firefighting force in the performance of an official duty.
3. Any other person meeting exemption requirements specified in the order.



**PLANNING AND DEVELOPMENT SERVICES
DEPARTMENT**

455 Mountain Village Blvd.
Mountain Village, CO 81435
(970) 369-8250

Agenda Item No. 8

TO: Town Council

FROM: Michelle Haynes, Planning and Development Services Director

FOR: Meeting of June 14, 2018

DATE: May 18, 2018

RE: Second Reading and Council Vote on an Ordinance Approving a Community Development Code (CDC) Amendment to CDC Section 17.5.6.C.3. Roof Material pursuant to CDC Section 17.1.7 Amendments to the Community Development Code

BACKGROUND

The department seeks to make amendments to the Roof Material Section of the Community Development Code (CDC) found at CDC Section 17.5.6.C.3.

ATTACHMENT

- Ordinance with Exhibit A. CDC Redline of the Roof Material Section
- Clean version of the CDC amendment

HISTORY

Staff and the DRB re-initiated the village center roof tile discussion in December of 2017 to address two primary issues: 1) Burnt sienna concrete tile from Westile was no longer being manufactured 2) Consideration of expanding roof material options in the Village Center. The DRB held the following meetings regarding the roof material discussion:

- December 12, 2017 special DRB roof material meeting
- February 22, 2018 special DRB and Town Council roof material and village center design theme meeting
- March 1, 2018 worksession
- March 29, 2018 worksession
- May 3, 2018 A review and recommendation to Town Council regarding amendments to the CDC regarding Village Center roofing requirements.

The DRB also supported an information webpage for building owners and HOA's in the Village Center found at the following link on the Town's website:

<https://townofmountainvillage.com/governing/building-development/long-range-planning/roofing-information/>

DISCUSSION

The proposed CDC amendment is exhibit A to this memo. New language is underlined in green and red. Removed language is shown as a strike through.

INTENT

In summary the proposed CDC amendment achieves the following:

Outside of the Village Center zone district

- Add bonderized metal as a permitted material.
- Add brown patina copper as a permitted roof material.
- Remove verde (green) as a permitted patina.
- Remove galvanized corrugated or standing seam metal (not rusted or reflective) with specific approval.
- Add solar roof tiles with specific approval.

Village Center zone district

1. Expand roof material options with a class 3 application and DRB review to include:
 - a. Burnt sienna concrete tile (note: currently this is the only allowed material).
 - b. Earth tone concrete tile compatible with burnt sienna tile in color and texture.
 - c. Brown patina copper
 - d. Standing seam or bonderized metal (dark grey or black) (not rusted)
 - e. Zinc
 - f. Add solar roof tiles.
 - g. Add "some variation of roof material color is permissible by specific DRB approval as long as it is contextually compatible in design, color, theme and durability."
2. Allow for modifications to roof materials on dormers and secondary roof forms to be approved by staff through a class 1 development application.
 - a. Allow for bevel edged corrugated (not rusted) metal to be approved.

FIRST READING

The Town Council approved at first reading of an ordinance on May 17, 2018, the CDC amendment with one modification, to add the term "non-reflective" after solar roof tiles. This is reflected in the attached ordinance.

ANALYSIS

The proposed CDC roof material amendment allows for more permitted materials in and outside of the Village Center. Creates a larger list of material options approvable by the DRB in the Village Center as well. With considerable analysis the DRB recommended by unanimous approval the CDC amendment under your review at their May 3, 2018 DRB meeting.

The DRB would next like to address creating specific CDC amendments regarding Village Center Design Theme and Design Regulations within the next 18 months and as part of the Village Center Subarea planning efforts.

PROPOSED MOTION

Staff recommends the Town Council approve on second reading on an ordinance the CDC amendment as attached with the following proposed motion:

I move to approval on second reading of an ordinance an amendment to CDC Section 17.5.6.C.3. Roof Materials attached as exhibit A.

This motion is based on evidence and testimony provided at a public hearing held on June 14, 2018, with notice of such hearing as required by the Community Development Code.

ORDINANCE NO. 2018-__

AN ORDINANCE AMENDING THE COMMUNITY DEVELOPMENT CODE (CDC) AT SECTION 17.5.6.C.3, AMENDING THE ROOF MATERIAL SECTION

RECITALS

- A. The Town of Mountain Village (the “Town”) is a legally created, established, organized and existing Colorado municipal corporation under the provisions of Article XX of the Constitution of the State of Colorado (the “Constitution”) and the Home Rule Charter of the Town (the “Charter”).
- B. Pursuant to the Constitution, the Charter, the Colorado Revised Statutes and the common law, the Town has the authority to regulate the use and development of land and to adopt ordinances and regulations in furtherance thereof.
- C. The Town Council may amend the CDC, including the Roof Material Section in the CDC, from time to time.

NOW THEREFORE, BE IT ORDAINED BY THE TOWN COUNCIL OF THE TOWN OF MOUNTAIN VILLAGE, COLORADO AS FOLLOWS:

Section 1. Amendment of Community Development Code

- A. The Town of Mountain Village Community Development Code, section 16.5.6.C.3 is hereby amended and replaced as set forth in Exhibit A which is attached hereto and incorporated herein.
- B. The Planning Division is directed to codify the amendments in Exhibit A into the CDC.
- C. The Planning Division may correct typographical and formatting errors in the amendments or the adopted CDC.

Section 2. Ordinance Effect

- D. This Ordinance shall have no effect on pending litigation, if any, and shall not operate as an abatement of any action or proceeding now pending under or by virtue of the ordinances repealed or amended as herein provided and the same shall be construed and concluded under such prior ordinances.
- E. All ordinances, of the Town, or parts thereof, inconsistent or in conflict with this Ordinance, are hereby repealed, replaced and superseded to the extent only of such inconsistency or conflict.

Section 3. Severability

The provisions of this Ordinance are severable and the invalidity of any section, phrase, clause or portion of this Ordinance as determined by a court of competent jurisdiction shall not affect the validity or effectiveness of the remainder of this Ordinance.

Section 4. Effective Date

This Ordinance shall become effective on _____, 2018.

Section 5. Public Hearing

A public hearing on this Ordinance was held on the 14th of June, 2018 in the Town Council

Chambers, Town Hall, 455 Mountain Village Blvd, Mountain Village, Colorado 81435.

INTRODUCED, READ AND REFERRED to public hearing before the Town Council of the Town of Mountain Village, Colorado on the 14th of June, 2018

TOWN OF MOUNTAIN VILLAGE:

**TOWN OF MOUNTAIN VILLAGE,
COLORADO, A HOME-RULE
MUNICIPALITY**

By: Laila Benitez, Mayor

ATTEST:

Jackie Kennefick, Town Clerk

HEARD AND FINALLY ADOPTED by the Town Council of the Town of Mountain Village, Colorado this 14th of June, 2018.

TOWN OF MOUNTAIN VILLAGE:

**TOWN OF MOUNTAIN VILLAGE,
COLORADO, A HOME-RULE
MUNICIPALITY**

By: Laila Benitez, Mayor

ATTEST:

Jackie Kennefick, Town Clerk

Approved As To Form:

Jim Mahoney, Assistant Town Attorney

I, Jackie Kennefick, the duly qualified and acting Town Clerk of the Town of Mountain Village, Colorado ("Town") do hereby certify that:

1. The attached copy of Ordinance No. _____ ("Ordinance") is a true, correct and complete copy thereof.

2. The Ordinance was introduced, read by title, approved on first reading with minor amendments and referred to public hearing by the Town Council the Town ("Council") at a regular meeting held at Town Hall, 455 Mountain Village Blvd., Mountain Village, Colorado, on _____, 2018, by the affirmative vote of a quorum of the Town Council as follows:

Council Member Name	"Yes"	"No"	Absent	Abstain
Laila Benitez, Mayor				
Dan Caton, Mayor Pro-Tem				
Dan Jansen				
Bruce MacIntire				
Patrick Berry				
Natalie Binder				
Jack Gilbride				

3. After the Council's approval of the first reading of the Ordinance, notice of the public hearing, containing the date, time and location of the public hearing and a description of the subject matter of the proposed Ordinance was posted and published in the Telluride Daily Planet, a newspaper of general circulation in the Town, on _____, 2018 in accordance with Section 5.2b of the Town of Mountain Village Home Rule.

4. A public hearing on the Ordinance was held by the Town Council at a regular meeting of the Town Council held at Town Hall, 455 Mountain Village Blvd., Mountain Village, Colorado, on June 14, 2018. At the public hearing, the Ordinance was considered, read by title, and approved without amendment by the Town Council, by the affirmative vote of a quorum of the Town Council as follows:

Council Member Name	"Yes"	"No"	Absent	Abstain
Laila Benitez, Mayor				
Dan Caton, Mayor Pro-Tem				
Dan Jansen				
Bruce MacIntire				
Patrick Berry				
Natalie Binder				
Jack Gilbride				

5. The Ordinance has been signed by the Mayor, sealed with the Town seal, attested by me as Town Clerk, and duly numbered and recorded in the official records of the Town.

IN WITNESS WHEREOF, I have hereunto set my hand and affixed the seal of the Town this _____ day of _____, 2018.

Jackie Kennefick, Town Clerk

(SEAL)

3. Roof Material

- a. All roofing material shall be of a type and quality that will withstand high alpine climate conditions.
- b. The review authority may require class A roofing materials as a fire mitigation measure.
- c. Permitted roof material outside the Village Center include:

Metal roof material limited to the following: Rusted, black or gray standing seam-, bonderized or corrugated metal (not reflective);

~~i.~~ Zinc;

~~ii.i.~~ Minimum 1/2" slate; and

~~ii.~~ ~~iv. Synthetic materials that have been approved by the Design Review Board for general use after having been used on individual projects and the Board makes the finding that the material has proven to meet the standards stated below.~~ Copper;

~~(a) Copper shall only be considered when it is proposed with a brown or verde brown-patina finish, where visible except for the Village Center where a verde patina finish is required.~~

~~(b) The brown patina copper finish shall be completed prior to issuing a certificate of occupancy.~~

~~d.a. Village Center roofing material shall be concrete tile or synthetic materials that emulate concrete tile of the color burnt sienna except for special copper accent roofs that shall require specific approval of the DRB.~~

~~e.d.~~ The following roofing materials outside of the Village Center may shall be approved by the DRB as a specific approval that is processed as a class 3 development application if the DRB finds the roofing material is consistent with the town design theme and the applicable Design Regulations:

~~i.~~ Copper;

~~(a) Copper shall only be considered when it is proposed with a brown or verde patina finish where visible except for the Village Center where a verde patina finish is required.~~

~~(b) The copper finish shall be completed prior to issuing a certificate of occupancy.~~

~~ii.~~ Galvanized corrugated or standing seam metal (not rusted or reflective);

~~iii.i.~~ Synthetic roofing material that accurately emulates wood shake, concrete and slate tile or any other roofing material permitted or existing in Mountain Village.

(a) Synthetic roofing material shall be:

(i.) Durable

(ii.) High strength, both material and shape;

- (iii.) Low absorption or permeability;
- (iv.) High freeze/thaw damage resistance;
- (v.) Color throughout the tile (not surface applied); and
- ~~(vi.)~~ High-quality design that fits within the architectural context of the building and the architectural context of the surrounding area.

~~ii. Solar roof tiles so long as they are contextually compatible in design, color, theme and durability (non-reflective).~~

~~e. Village Center roofing material will require a class 3 development application and building specific design review. The following roof materials shall be approved by the DRB if the DRB finds the roofing material is consistent with the town design theme and applicable Design Regulations:~~

~~i. Burnt sienna concrete tile, shall be concrete tile or synthetic materials that emulate concrete tile of the color burnt sienna except for special copper accent roofs that shall require specific approval of the DRB.~~

~~ii. Earth tones compatible with burnt sienna concrete tile in color and texture.~~

~~iii. Brown patina copper~~

~~iv. Standing seam or bonderized metal (dark grey or black) (not rusted)~~

~~v. Zinc~~

~~vi. Solar roof tiles so long as they are contextually compatible in design, color, theme and durability (non-reflective).~~

~~vii. Some variation of roof material color is permissible by specific DRB approval as long as it is contextually compatible in design, color, theme and durability.~~

~~f. Modification to roof materials on dormers and secondary roof forms may be reviewed as a class 1 development application.~~

~~i. Permitted roof materials are listed in e.i-vii above.~~

~~ii. bevel edged corrugated (not rusted) metal may be approved so long as it is contextually compatible in design, color, theme and durability.~~

~~(vi.)~~

~~f.g. The following requirements are applicable to all roofing:~~

~~i. Metal roofing surface shall not reflect an excessive amount of light when viewed against direct sunlight.~~

~~ii. Unless the DRB grants a specific approval for a non-rusted metal roof, corrugated and standing seam roofing materials shall be pre-treated to produce rusting prior to placement on the roof, and prior to the issuance of a certificate of occupancy.~~

~~g.h. The installation or re-installation of wood shakes, glazed tile and asphalt shingles is prohibited, except for the repair or replacement of wood shake roof areas that are 25% or less of the total roof surface area.~~

~~h.i. Roof flashing, Gutters Downspouts and Similar Hardware:~~

- i. In the Village Center, all exposed metal flashing, gutters, downspouts and other roof hardware shall be copper except when ~~either~~ structural requirements dictate the use of stronger materials such as for snow fences.
- ii. In all other areas, other metal guttering besides copper may be approved by the review authority to allow it to match roofing material, such as the use of rusty steel guttering on a rusty metal roof.
- iii. When steel or iron are used, they shall be either rusted to match the roof or finished with a baked on enamel paint or, subject to the prior approval of the review authority, a silicon modified alloy or special epoxy paint system of a color approved by the review authority.

3. Roof Material

- a. All roofing material shall be of a type and quality that will withstand high alpine climate conditions.
- b. The review authority may require class A roofing materials as a fire mitigation measure.
- c. Permitted roof material outside the Village Center include:
 - i. Metal roof material limited to the following: rusted, black or gray standing seam, bonderized or corrugated metal (not reflective);
 - ii. Zinc;
 - iii. Minimum 1/2" slate; and
 - iv. Copper;
 - (a) Copper shall only be considered when it is proposed with a brown patina finish.
 - (b) The copper finish shall be completed prior to issuing a certificate of occupancy.
- d. The following roofing materials outside of the Village Center shall be approved by the DRB as a specific approval that is processed as a class 3 development application if the DRB finds the roofing material is consistent with the town design theme and the applicable Design Regulations:
 - i. Synthetic roofing material that accurately emulates wood shake, concrete and slate tile or any other roofing material permitted or existing in Mountain Village.
 - (a) Synthetic roofing material shall be:
 - (i.) Durable
 - (ii.) High strength, both material and shape;
 - (iii.) Low absorption or permeability;
 - (iv.) High freeze/thaw damage resistance;
 - (v.) Color throughout the tile (not surface applied); and
 - (vi.) High-quality design that fits within the architectural context of the building and the architectural context of the surrounding area.
 - ii. Solar roof tiles so long as they are contextually compatible in design, color, theme and durability (non-reflective).
- e. Village Center roofing material will require a class 3 development application and building specific design review. The following roof materials shall be approved by the DRB if the DRB finds the roofing material is consistent with the town design theme and applicable Design Regulations:
 - i. Burnt sienna concrete tile
 - ii. Earth tones compatible with burnt sienna concrete tile in color and texture
 - iii. Brown copper
 - iv. Standing seam or bonderized metal (dark grey or black) (not rusted)
 - v. Zinc

- vi. Solar roof tiles so long as they are contextually compatible in design, theme and durability (non-reflective).
 - vii. Some variation of roof material color is permissible by specific DRB approval as long as it is contextually compatible in design, color, theme and durability.
- f. Modification to roof materials on dormers and secondary roof forms may be reviewed as a class 1 development application.
- i. Permitted roof materials are listed in e.i-vii above.
 - ii. Bevel edged corrugated (not rusted) metal may be approved so long as it is contextually compatible in design, color, theme and durability.
- g. The following requirements are applicable to all roofing:
- i. Metal roofing surface shall not reflect an excessive amount of light when viewed against direct sunlight.
 - ii. Unless the DRB grants a specific approval for a non-rusted metal roof, corrugated and standing seam roofing materials shall be pre-treated to produce rusting prior to placement on the roof, and prior to the issuance of a certificate of occupancy.
- h. The installation or re-installation of wood shakes, glazed tile and asphalt shingles is prohibited, except for the repair or replacement of roof areas that are 25% or less of the total roof surface area.
- i. Roof flashing, Gutters Downspouts and Similar Hardware:
- i. In the Village Center, all exposed metal flashing, gutters, downspouts and other roof hardware shall be copper except when structural requirements dictate the use of stronger materials such as for snow fences.
 - ii. In all other areas, other metal guttering besides copper may be approved by the review authority to allow it to match roofing material, such as the use of rusty steel guttering on a rusty metal roof.
 - iii. When steel or iron are used, they shall be either rusted to match the roof or finished with a baked on enamel paint or, subject to the prior approval of the review authority, a silicon modified alloy or special epoxy paint system of a color approved by the review authority.



**PLANNING AND DEVELOPMENT SERVICES
DEPARTMENT**
455 Mountain Village Blvd.
Mountain Village, CO 81435
(970) 369-8250

Agenda Item No. 9

TO: Town Council
FROM: Sam Starr, Planner
FOR: Meeting of June 14, 2018
DATE: June 7, 2018
RE: Consideration of a Resolution to Approve a Major Scale Subdivision for Lot 151R Per Community Development Code Section 17.4.13.E2

PROJECT GEOGRAPHY

Legal Description: Lot 151R, Town of Mountain Village according to Plat Book 1, Page 4436 according to records of San Miguel County, Colorado.
Address: 239 Country Club Drive
Applicant/Agent: Alpine Planning LLC
Owner: The Retreat at Mountain Village III
Zoning: Multi Family
Existing Use: Vacant land with four condominium unit densities (12 person equivalent)
Proposed Use: Single Family Zoning and replat into three lots with one single family density (4 person equivalent per lot)
Lot Size: .909 acres
Adjacent Land Uses:

- **North:** Single Family
- **South:** Open Space
- **East:** Multi Family
- **West:** Multi Family

ATTACHMENTS

- Exhibit A: Applicant's Narrative
- Exhibit B: Proposed Plat
- Exhibit C: Current Plat
- Exhibit D: Existing Conditions
- Exhibit E: Geotechnical Plans
- Exhibit F: Civil Plans
- Exhibit G: Application
- Exhibit H: Public Comment
- Exhibit I: Resolution

BACKGROUND

The owners of Lot 151R, 239 Country Club Drive have applied to replat the property into three (3) single family lots. In addition to the Major subdivision application, the applicant submitted a rezone and density transfer application to rezone the existing four (4) condominium unit densities to three (3) single family densities and rezone the property from multi-family to the single family zone district. Both applications have been received and are being reviewed concurrently. The minor subdivision application will be reviewed with the rezone and density transfer application by Town Council on June 14th, 2018.

CRITERIA AND ANALYSIS

17.4.13.E.1 Major Subdivisions.

The following criteria shall be met for the review authority to approve a major subdivision:

- a) The proposed subdivision is in general conformance with the goals, policies and provisions of the Comprehensive Plan;
- b) The proposed subdivision is consistent with the applicable Zoning and Land Use Regulations and any PUD development agreement regulating development of the property;
- c) The proposed density is assigned to the lot by the official land use and density allocation, or the applicant is processing a concurrent rezoning and density transfer;
- d) The proposed subdivision is consistent with the applicable Subdivision Regulations;
- e) Adequate public facilities and services are available to serve the intended land uses;
- f) The applicant has provided evidence to show that all areas of the proposed subdivision that may involve soil or geological conditions that may present hazards or that may require special precautions have been identified, and that the proposed uses are compatible with such conditions;
- g) Subdivision access is in compliance with Town standards and codes unless specific variances have been granted in accordance with the variance provisions of this CDC; and
- h) The proposed subdivision meets all applicable Town regulations and standards.

The proposal to downzone from multi family to single family is consistent with the Comprehensive Plan which notes in Land Use Value Number 8, land uses are envisioned to fit into the surrounding neighborhood. (p. 35 of the Comprehensive Plan). The existing zoning and density of single family homes from 230 to 266 Country Club Drive demonstrate that this subdivision would be appropriate for the neighborhood character.

17.4.13.f Subdivision Design Standards and General Standards

The proposed replat from one property to three properties must also meet the subdivision design standards and general standards. I have drawn your attention to the pertinent standards below for discussion.

17.4.F.1.e General Easement

Although the northern and southern General Easements (GE) are conforming with a 16-foot GE typically associated with single family zoned lots, the proposed plat shows an 8 foot interior lot line setbacks (not GE's) between the proposed lots, and 8-foot General Easements on the west edge of proposed lot 151R-1 and an 8-foot GE the east side of proposed Lot 151R-3.

The CDC states that “Each lot shall provide for a 16’ general easement that is consistent with the general easement requirements set forth in the Zoning and Land Use Regulations.” The CDC also states that the review authority may not apply a general easement or setback to a subdivision, lot or development if the Town has previously established a general easement for the whole subdivision, or different setbacks, easements or other restrictions that limit development to a certain area of a lot. Thus, the Design Review Board has discretion to approve GE’s and/or setbacks less than 16 feet with this application.

17.4.13.F.1.c. Lot Size

There are similarly sized single family zoned lots to the north and west of these proposed properties.

17.4.13.H.5 Pedestrian Connections

Big Billie’s Trail currently runs through the south-eastern portion of the General Easement of lot 151R. This trail is town maintained, and pedestrian access is recognized as an acceptable use of the town’s General Easement. To protect use of Big Billie’s Trail the applicant will need to provide a plat note prior to recordation that states the Big Billie’s Trail is an allowed use of the GE as a Town pedestrian access trail.

17.4.13.I Water, Sewage Disposal, and Utilities

Town of Mountain Village Public Works Director Finn Kjome indicated in the referral comments that the proposed utility plan would be acceptable (see Exhibit F sheet 2), provided that the applicant work with Telluride Ski and Golf, LLC. to obtain an affirmation of service and sewer easement agreement. A condition has been provided in the proposed motion that requires applicant to obtain an agreement prior to recordation of the subdivision.

STAFF ANALYSIS

The applicant has met the subdivision criteria. Staff recommends approval of the major subdivision application.

DRB RECOMMENDATION

On June 7, 2018, the DRB voted 4-0 to approve the Major Subdivision application for Lot 151R, with the following conditions:

1. The applicant will work with TSG and submit a sewer easement agreement to the town prior to recordation of the new plat.
2. Applicant will formalize continued public use of the Big Billie’s Trail in its current location on the southwest corner of Lot 151R, as shown on Exhibit D by legal instruction or otherwise agree to have it relocated onto TSG property.
3. A Subdivision Improvements Agreement will be executed to the satisfaction of the Town Attorney consistent with 17.4.13.I.4 & 5 Utility Design Standards and Required Utility Improvements.
4. The Applicant will submit appropriate fees to staff for recordation with the San Miguel County Assessor's office within six months of approval.
5. Staff will review the replat document to verify consistency with CDC Sections 17.4.13.N. Plat Standards, and CDC Section 3. Plat Notes and Certifications, and provide redline comments to the applicant prior to execution of the final mylar.

6. The major subdivision approval is conditioned upon final approval of the concurrent rezone to single family zoning and single-family density application by Town Council.
7. Staff has the authority to provide ministerial and conforming comments on the mylar prior to recordation.
8. DRB recommends that Town Council Consider a 16' General Easement on the Western and Eastern portion of 151R.

PROPOSED MOTION

I approve the Major Subdivision application to replat Lot 151R into three lots pursuant to CDC Sections 17.4.13, with the following conditions:

1. The applicant will work with TSG and submit a sewer easement agreement to the town prior to recordation of the new plat.
2. Applicant will formalize continued public use of the Big Billie's Trail in its current location on the southwest corner of Lot 151R, as shown on Exhibit D by legal instruction or otherwise agree to have it relocated onto TSG property.
3. A Subdivision Improvements Agreement will be executed to the satisfaction of the Town Attorney consistent with 17.4.13.I.4 & 5 Utility Design Standards and Required Utility Improvements.
4. The Applicant will submit appropriate fees to staff for recordation with the San Miguel County Assessor's office within six months of approval.
5. Staff will review the replat document to verify consistency with CDC Sections 17.4.13.N. Plat Standards, and CDC Section 3. Plat Notes and Certifications, and provide redline comments to the applicant prior to execution of the final mylar.
6. The major subdivision approval is conditioned upon final approval of the concurrent rezone to single family zoning and single family density application by Town Council.
7. Staff has the authority to provide ministerial and conforming comments on the mylar prior to recordation.

/STS

Lot 151R Rezoning and Subdivision



BACKGROUND

The Retreat at Mountain Village III (“Owner”) desires to rezone Lot 151R (“Property”) from the Multi-family Zone District to the Single-family Zone District and to replat the Property to create three single-family lots as shown in Exhibit A.

The Property is located at 239 Country Club Drive as shown in Figure 1. The Property is located to the north of the Hole 1 Fairway, with the Big Billies Trail located along the property line and in a portion of the southern general easement.

The Property has a low USGS elevation of 9296 and a high elevation of 9362 with an overall elevation gain of 66 feet with slopes that are generally less than 30%. There are some slopes that are 30% or greater that are located in the westerly half of the Property as shown on the slope map in Exhibit B.

The Property has the following designated land uses:

Lot	Acreage	Zone District	Zoning Designation	Actual Units	Density Per Unit	Equivalent Units
151R	0.91	Multi-Family	Condo	4	3	12

The proposed land uses for the Property follows:

Lot	Acreage	Zone District	Zoning Designation	Actual Units	Density Per Unit	Equivalent Units
151R	0.91	Single-family	Single-family	3	4	12

There is no need to transfer density to or from the Property.

The Property was first platted in 1984 under the Mountain Village Filing No. 1 Plat at Reception Number 233115, with the designated use of a Condominium Lot with three condominium units. The Property was re-platted in 1987 to create three lots that allowed one detached single-family condominium on each lot. The Town approved a replat of the Property in 2011 that vacated the lot lines to create Lot 151R that is the current plat for the Property (Exhibit C).

REZONING

Rezoning Criteria for Decision

The proposed rezoning meets the Rezoning criteria for decision set forth in Community Development Code (“CDC”) Section 17.4.9(C) as set forth in the following sections.

General Conformance with the Comprehensive Plan

The Mountain Village Comprehensive Plan (“Comprehensive Plan”) Future Land Use Plan envisions the Property rezoned to the Single-family Zone District as shown in Figure 2. The Multi-family Zone District currently permits detached condominiums that are built as single-family dwellings. Detached condominiums are viewed as single-family development. So both the current zoning and the Comprehensive Plan contemplate the single-family land uses for the Property. There are no wetlands, trees or forests located on the Property. Steep slopes are addressed latter in this narrative.

Figure 1. Vicinity Map

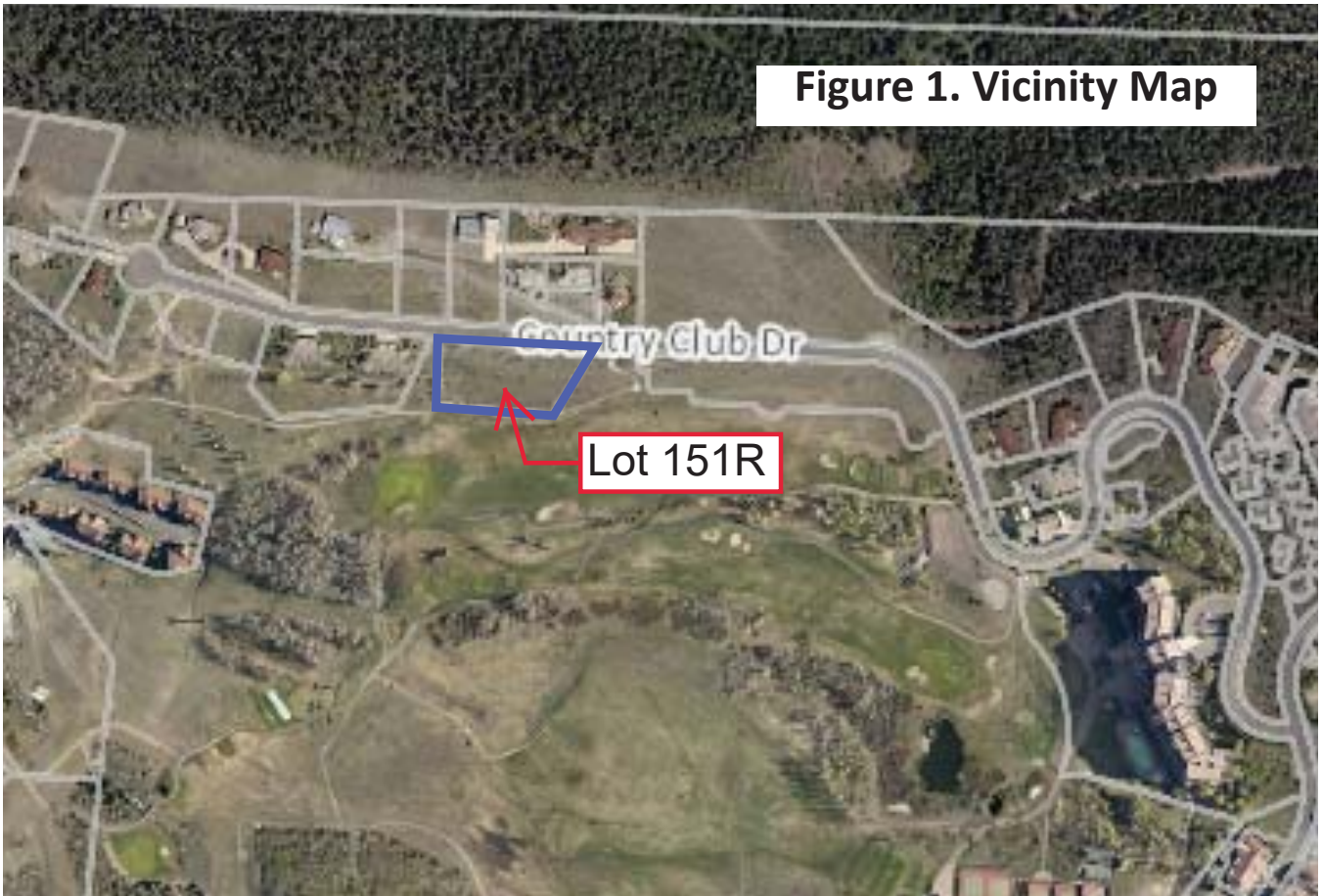
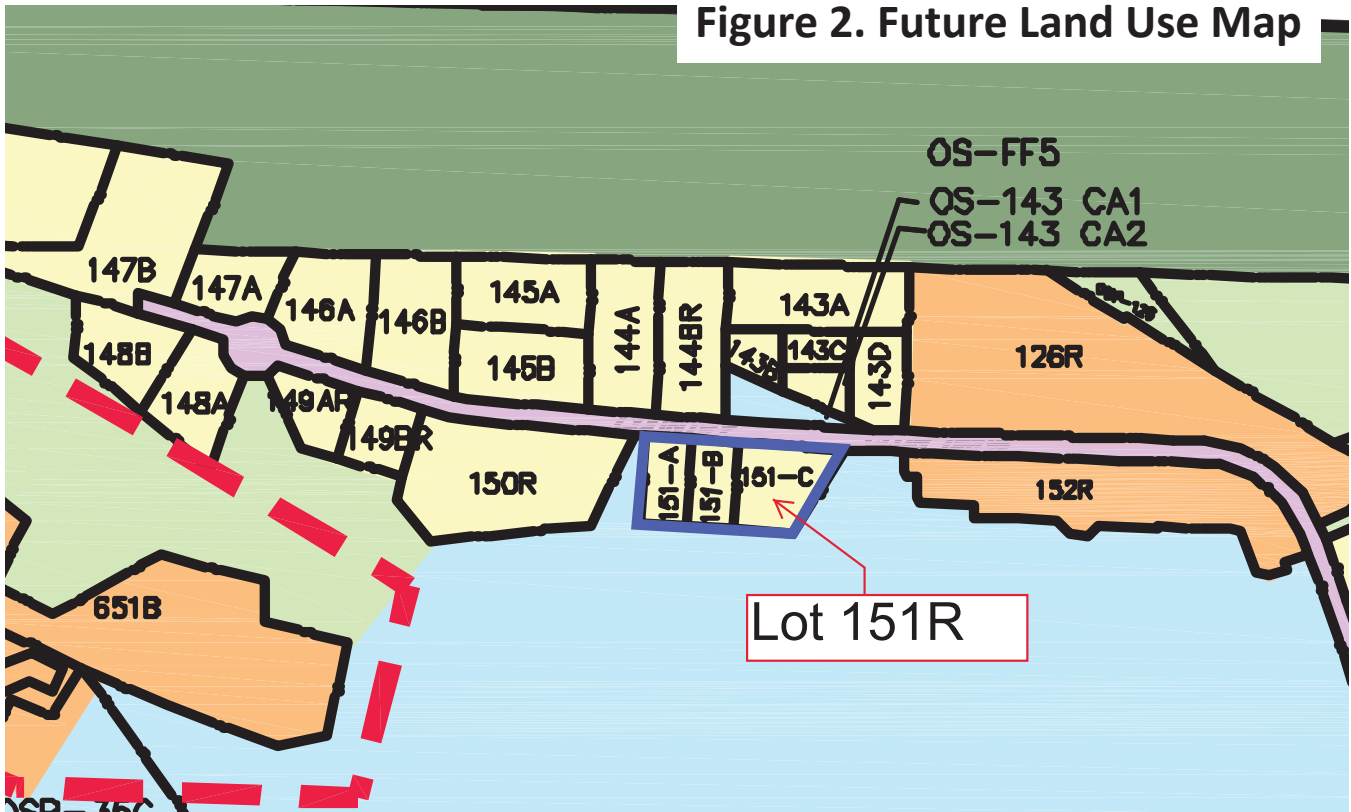


Figure 2. Future Land Use Map



Consistency with the Zoning and Land Use Regulations

The proposed rezoning and subdivision are consistent with the Zoning and Land Use Regulations contained in CDC Section 17.3. Single-family dwellings are permitted uses in the Single-family Zone District. The existing person equivalent density allows for the conversion of four condominium units to three single-family dwellings with no need to transfer density to or from the Property. The rezoning and subdivision do not impact platted open space. Building height and lot coverage will be in compliance with the CDC limitations. The owner is proposing to establish 16 foot general easements in between the proposed building envelopes with eight (8) feet on either side of the interior lot lines and to vacate the general easement on the east and west sides of the Property as discussed below.

General Easement Vacation

The Owner is seeking to vacate the eastern and western general easements from 16 feet to 8 feet as shown in Exhibit A. The main purposes of the general easement are to provide buffering to surrounding land uses and to maintain the ability to conduct any of the general easement allowed uses. The west and east sides of the Property abut TSG open space which provides ample buffering to surrounding land uses, with 64 feet to the development to the west, and over 127 feet to the Northlight property to the east. The Big Billies Trail will be provided a 16 foot general easement setback as it runs along the southerly Property boundary. The Owner has agreed to a plat note that requires landscape buffering in the western and eastern general easements of Lot 1 and Lot 3, respectively, to soften the development as viewed from surrounding development.

The general easement definition allows for the following uses, improvements and activities:

“...utilities, drainage, electrical service, communication service, ski slope maintenance, bicycle

access, skier access, roadway access, equestrian access, pedestrian access, golf cart access, snow making, waterways, slope maintenance, snow storage, retaining walls, snowmobile access, snow removal, snowcat access, water, sanitary sewer and storm sewer.”

These general easement uses and activities are not needed for the Property because all utilities have been established in the area and the surrounding open space allows for ski-related uses. We therefore believe that the eastern and western general easements may be reduced and vacated from 16’ to 8’ as shown on the proposed plat.

The Town has historically allowed for the vacation and reduction of the general easement to allow for desired development plans, with the most applicable example at Trails Edge Subdivision where the general easement was vacated where it adjoined open space to the north. Even Lot 151R had portions of the general easement vacated as shown in Exhibit E. We are similarly requesting the Town consider vacating the general easement as shown, with the general easement section of the CDC recognizing general easement vacations.

Comprehensive Plan Project Standards

The proposed rezoning will meet the Comprehensive Plan Project Standards because visual impacts will be minimized. The current and proposed zoning allowing a building height of 30 feet plus 5 feet for gabled roofs and for detached condominiums without size limitations pursuant to the Multi-family Zone District standards, subject to a 65% lot coverage. The Single-family Zone District limits lot coverage to 40%, so there is also a 20% reduction in allowed lot coverage with the rezoning. The single-family dwellings will have less scale and mass that is designed in accordance with the Zoning and Land Use Regulations and the Design Regulations. Environmental and geotechnical impacts will be minimized and mitigated consistent with the Comprehensive Plan and the CDC. Site specific issues will be addressed concurrent with the Design Review Process.

Rezoning Justification

The rezoning is justified because it is envisioned by the Future Land Use Map as shown in Figure 2.

Public Facilities and Services

The site survey in Exhibit D shows that water, natural gas and telecommunications are available in the Country Club Drive Right-of-Way. Electricity will have to be provided from the north of County Club Drive. Sewer is available in the TSG open space to the south. Fire protection is provided by the Telluride Fire Protection District. Police protection, street maintenance and general government services are available from the Town.

Circulation, Parking, Trash and Deliveries

The Property has access from Country Club Drive, with trash pickup and deliveries easily and safely accessible. Parking will be provided on each site in accordance with the Design Regulations.

SUBDIVISION

Criteria for Decision

The proposed development is classified as a Major Subdivision. The proposed subdivision complies with the Subdivision criteria for decision set forth in CDC Section 17.4.13(E)(1) as outlined in the following sections.

General Conformance with the Comprehensive Plan

The proposed subdivision generally conforms to the Comprehensive Plan as outlined under the rezoning section above.

Consistency with the Zoning and Land Use Regulations

The proposed subdivision is consistent with the Zoning and Land Use Regulations as set forth under the rezoning section above.

Density Allocation

The concurrent rezoning request is proposing to convert the four actual units and 12 person equivalent units of condominium density to 12 person equivalents of single-family density for the three (3) proposed lots.

Consistency with Subdivision Regulations

The proposed subdivision is consistent with the Subdivision Regulations as set forth below.

Adequate Public Facilities and Services

The site survey in Exhibit D shows that water, natural gas and telecommunications are available in the Country Club Drive Right-of-Way. Electricity will have to be provided from the north of County Club Drive. Sewer is available in the TSG open space to the south, with a draft easement to cross TSG land in process. Fire protection is provided by the Telluride Fire Protection District. Police protection, street maintenance and general government services are available from the Town. A draft civil plan for utilities is shown in Exhibit F.

Soil and Geologic Conditions

The approval of the Mountain Village Filing No. 1 plat and the original County PUD found that the development of the area avoids areas subject to geological hazards. A geotechnical report may be required by the Town Building Department as a part of the building permit process for each lot to ensure homes are designed in accordance with soil conditions that are present on the Property. A geotechnical report for the Property to the west, Lot 150, is shown in Exhibit E.

Subdivision Access

Each lot will be accessed from Country Club Drive and will be designed to meet the Driveway Standards contained in CDC Section 17.6.6(B) unless a variation is granted by the Design Review Board during the Design Review Process as allowed by Subsection 23. The draft access and grading plan is shown in Exhibit F.

Subdivision Design Standards and General Standards

The proposed subdivision complies with the Subdivision Design and General Standards set forth in CDC Section 17.4.13(F) as set forth in the following sections.

Minimum Frontage. Each lot has over 50 feet of frontage.

Vehicular and Utility Access. Vehicular and utility access is provided off of Country Club Road with the exception of sewer. The site survey shows the sewer line is located on TSG open space so we are working with TSG to create a new sewer line easement for the subdivision. This easement will be submit-

ted for Town review and approval in the near future.

Minimum Lot Size. The proposed lot sizes are envisioned by the Comprehensive Plan as shown in Figure 2. In addition, the proposed lot sizes are approximately 0.3 acres which is very similar to the lots to the north (Lots 143B, 143C and 143D) that have an average size of 0.22 acre.

Solar Access. Each lot will have great solar access to the south.

General Easement. A 16 foot general easement is provided on the north and south lot lines. The Owner is proposing to vacate the 16 foot western and eastern general easement and provide an 8 foot setback/general easement as outlined in the zoning discussion above. The general easements and setbacks as proposed will provide for adequate buffering and general easement uses. A 16 foot general easement is provided in between each building envelope in the subdivision, with 8 feet on either side of the lot line.

Design of Lots. The lots have been designed in accordance with the development pattern envisioned in the Comprehensive Plan; topographical considerations; convenient and safe access; provision of adequate building area that meets the zoning and subdivision requirements; utilities and views to the southwest.

Protection of Natural Features. There are no natural features on the site.

Topography of the Land. The subdivision has been designed to fit the topography of the land to the extent practical.

Areas Subject to Environmental Hazard. There are no environmental hazard areas in the Property.

Drainage. The Property survey shows two culverts in the northwest corner that are planned to be replaced with a new culvert as shown on the drainage plan in Exhibit F. Drainage from the proposed culvert is located in the proposed 8' general easement. The development of each lot will have to provide for the required drainage improvements as a part of the required Design Review Process.

Fire Protection. Fire protection is provided by the Telluride Fire Protection District. Hydrants have been installed along Country Club Drive as required by the original subdivision development of the area.

Street Improvements. Country Club Drive street improvements have already been installed. Each home will have to provide a new driveway onto Country Club Drive concurrent with development.

Water, Sewer and Utilities. Water, gas, telecommunications and electric utilities are available from Country Club Drive. The sewer line intended to serve Lot 151R and other lots to the west is located in TSG open space as discussed above.

Utility Design and Improvements. The Owner's team will need to work with the Town and utility agencies to create an overall utility plan with any needed subdivider improvements listed on a subdivision improvements agreement.

Required Dedications. There are no required land dedications for the subdivision. Big Billies Trail is located in the 16 foot general easement on proposed Lot 151R-3.

Maintenance of Common Areas. There are no common areas associated with the proposed subdivision.

Public Improvement Policy. The subdivision improvements agreement will be provided to the Town

after a utility plan is reviewed and approved by the utility agencies and the Town.

Steep Slope Regulations

The proposed subdivision has some area with slopes that are 30 percent or greater. CDC Section 17.6.1(C)(2)(a) states:

“Building and development shall be located off slopes that are thirty percent (30%) or greater to the extent practical.

i. In evaluating practicable alternatives, the Town recognizes that it may be necessary to permit disturbance of slopes that are 30% or greater on a lot to allow access to key viewsheds, avoid other environmental issues, buffer development and similar site-specific design considerations.”

Most of the lots on the south side of Country Club Drive contain steep slopes with the lots platted and density assigned to the site knowing such conditions existed. Disturbance to steep slopes is needed to allow for development envisioned by the Comprehensive Plan, access to key views and to allow for reasonable use of the Property. The Town has always envisioned the development of Lot 151 including the steep slopes areas given its size and the density permitted.

The intent of the Steep Slope Regulations is to protect water quality, visual resources and slope stability. In this case, there will be no adverse impacts to water quality, visual resources or slope stability due to the need to provide engineered plans, application of water quality protection measures, and height being limited due to the slopes dropping from Country Club Drive.

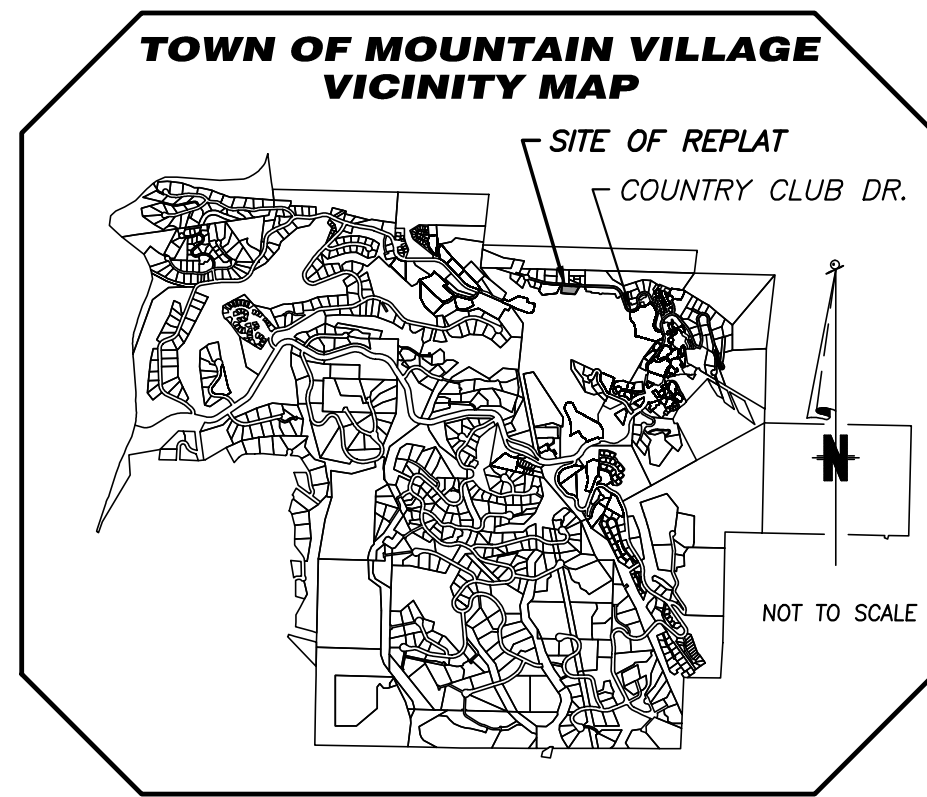
CDC 17.6.1(C)(2)(c) states:

The review authority shall only allow for disturbance to slopes thirty percent (30%) or greater if it is demonstrated that there is not a practicable alternative to avoiding such activities and if the following criteria are met:

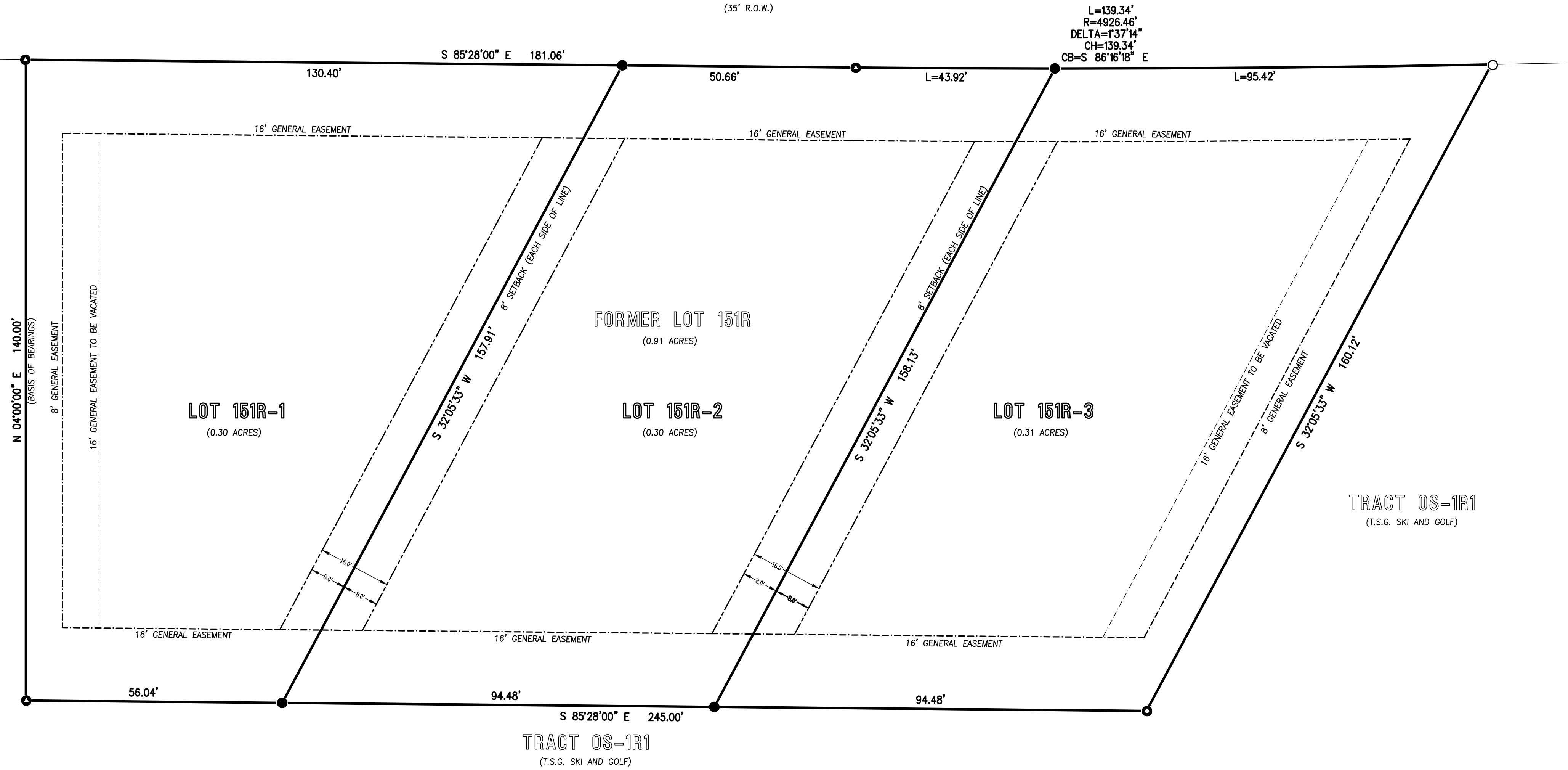
- i. The proposed steep slope disturbance is in general conformance with the Comprehensive Plan;
- ii. The proposed disturbance is minimized to the extent practical;
- iii. A Colorado professional engineer or geologist has provided:
 - (a) A soils report or, for a subdivision, a geologic report; or
 - (b) An engineered civil plan for the lot, including grading and drainage plans.
- iv. And the proposal provides mitigation for the steep slope development in accordance with the engineered plans.

The Comprehensive Plan envisions the development of three single-family lots as proposed by the Owner. The general easement and setback areas for each lot will minimize steep slopes associated with the fill for Country Club Drive. A soils report for Lot 150R to the west has been provided to show the general soils conditions for the area. Each lot will be required to submit a geotechnical report with the building permit applications to show that each home has been designed to meet site specific soils conditions. A Colorado Professional Engineer has prepared the conceptual grading plans for the drive-ways and the drainage as shown in Exhibit F, with each lot also required to have a Colorado PE prepare the drainage and grading plans.

COUNTRY CLUB DRIVE
(35' R.O.W.)



TRACT OS-1R1
(T.S.G. SKI AND GOLF)



SCALE: 1"=16'
0 4 8 12 16 32

LEGEND

- FOUND 1-1/2" ALUMINUM CAP ON No. 5 REBAR, L.S. 20632
- FOUND 1-1/2" ALUMINUM CAP ON No. 5 REBAR, L.S. 37662
- FOUND 1-1/2" ALUMINUM CAP ON No. 5 REBAR, L.S. 24954
- FOUND No. 5 REBAR, NO CAP
- SET 1-1/2" ALUMINUM CAP ON No. 5 REBAR, L.S. 37662

OWNERS CERTIFICATE:

KNOW ALL PERSONS BY THESE PRESENTS that
RETREAT AT MOUNTAIN VILLAGE III LLC, A Colorado limited liability Company, being the owner of the following described land:
LOT 151R, TELLURIDE MOUNTAIN VILLAGE, FILING 1, ACCORDING TO THE REPLAT OF LOTS 151A, 151B AND 151C, TELLURIDE MOUNTAIN VILLAGE, FILING NO. 1 RECORDED FEBRUARY 16, 2011 IN PLAT BOOK 1 AT PAGE 4436, COUNTY OF SAN MIGUEL, STATE OF COLORADO.

Have by these presents caused same to be laid out, platted and subdivided the same into lots, as shown on this Plat under the name and style of LOTS 151R-1, 151R-2 AND 151R-3, TOWN OF MOUNTAIN VILLAGE ("Plat") and, as the Owners, do hereby agree upon the boundary lines as set forth hereon and do further grant, sell and convey to the other owners such of their real property as may lie on the other parties' side of the boundary lines set forth on this Plat, and do hereby agree that the boundary lines shown on this Plat are the boundary lines by agreement of adjoining owners pursuant to Colorado Revised Statutes sec. 38-44-112.

OWNER:
as _____ of RETREAT AT MOUNTAIN VILLAGE III LLC, A Colorado limited liability Company

ACKNOWLEDGMENT
State of _____)
County of _____) ss
The foregoing signature was acknowledged before me this _____ day of _____, 20____ A.D. by _____ as _____ of RETREAT AT MOUNTAIN VILLAGE III LLC, A Colorado limited liability Company

My commission expires _____
Witness my hand and seal.
Notary Public

TOWN OF MOUNTAIN VILLAGE APPROVAL:

I, Laila Benitez, as Mayor of the Town of Mountain Village, Colorado do hereby certify that this Plat has been approved by the Town by Resolution No. _____
Mayor _____ Date _____
I, Michelle Haynes, as Planning and Development Services Director of the Town of Mountain Village, Colorado do hereby certify that this Plat has been approved by the Town by Resolution No. _____
Planning and Development Services Director _____ Date _____

TREASURER'S CERTIFICATE:

I, the undersigned, Treasurer of the County of San Miguel, do hereby certify that according to the records of the San Miguel County Treasurer there are no liens against the subdivision or any part thereof for unpaid state, county, municipal or local taxes or special assessments due and payable, in accordance with Land Use Code Section 3-101.
Dated this _____ day of _____, 2018.
San Miguel County Treasurer

SURVEYOR'S CERTIFICATE:

I, David R. Bulson of Foley Associates, Inc., being a Colorado Licensed Surveyor, do hereby certify that this Plat and survey of LOTS 151R-1, 151R-2 AND 151R-3, TOWN OF MOUNTAIN VILLAGE was made by me and under my direct responsibility, supervision and checking, in compliance with the applicable provisions of Title 38, Article 51, C.R.S., and that both are true and accurate to the best of my knowledge and belief.
P.L.S. No. 37662 _____ Date _____

NOTES:

- Approval of this plan may create a vested property right pursuant to Article 6B of Title 24, C.R.S., as amended.
- Easement research and property description from Land Title Guarantee Company, Order Number TLR86006734, dated February 02, 2017 at 5:00 P.M.
- NOTES OF CLARIFICATION:
 - The Configuration of the following lots, tracts, and right-of-way have been modified by this Plat: none
 - The following lots have been created by this Plat: Lot 151R-1, Lot 151R-2 and Lot 151R-3
 - The following lots have been deleted by this Plat: Lot 151R
- BASIS OF BEARINGS: Bearings for this survey based on monuments found along the western boundary of Lot 151R, as shown hereon, assumed to have the record bearing of N 04°00'00" E according to Plat Book 1 at page 4436 in the office of the San Miguel County Clerk and Recorder.
- Lineal Units represented hereon are shown in U.S. Survey Feet or a decimal portion thereof.
- NOTICE: According to Colorado law, you must commence any legal action based upon defect in this survey within three years after you first discover such defect. In no event may any action based upon any defect in this survey be commenced more than ten years from the date of the certification shown hereon.

TITLE INSURANCE COMPANY CERTIFICATE:

Land Title Guarantee Company does hereby certify that we have examined the title to all lands herein shown on this Plat and that the title to this land is in the names of those persons shown in the Owners Certificate which is on the face hereof and is free of all liens and taxes, except as follows:
Title Insurance Company Representative

RECORDER'S CERTIFICATE:

This Plat was filed for record in the office of the San Miguel County Clerk and Recorder on this _____ day of _____, 2018, at
Plat Book _____
Page _____
Reception No. _____
Time _____
San Miguel County Clerk

Lot 151R-1, Lot 151R-2 and Lot 151R-3, Town of Mountain Village,
A Replat of Lot 151R, Town of Mountain Village,
located within the SW1/4 of Section 34, T.43N., R.9W., N.M.P.M., County of San Miguel, State of Colorado.

Project Mgr:	DB	Rev.	description	date	by
Technician:	FD				
Checked by:					
Start date:	02/2018				



970-728-6153 970-728-6050 fax
P.O. BOX 1385
125 W. PACIFIC, SUITE B-1
TELLURIDE, COLORADO 81435
Drawing path: dws\6917 REPLAT 02-18.dwg
Sheet 1 of 1 Project #: 8917

CERTIFICATE OF OWNERSHIP

KNOW ALL PERSONS BY THESE PRESENTS that the Plat of Mountain Village II, LLC, a Colorado limited liability company ("Owner"), being the Owner in fee simple of all real property described as follows...

PROPERTY DESCRIPTION: Lots 151A, 151B and 151C, Replat of Lot 151, Telluride Mountain Village, Tract 1, according to the Plat recorded November 20, 1997 in Plat Book 1 of page 776.

OWNER: Retreat at Mountain Village II, LLC, a Colorado limited liability company.

ACKNOWLEDGMENT: State of Colorado, County of San Miguel.

My commission expires 11/21/11. Witness my hand and seal.



SURVEYOR'S CERTIFICATE

I, Jeffrey C. Hissell of Foley Associates, Inc., a Professional Land Surveyor licensed under the laws of the State of Colorado, do hereby certify that the LOT 151A, A REPLAT OF LOT 151A, 151B AND 151C, TELLURIDE MOUNTAIN VILLAGE, FILING No. 1...

IN WITNESS WHEREOF, I have set my hand and official seal this 25th day of February, A.D. 2011.

NOTES: 1. General research from Security Title Guaranty Company Order No. 00885650 dated April 12, 2011 of 151A, 151B AND 151C...

2. BEING OF RECORD: The bearing of the eastern property line of Lot 151A was assumed to be the record bearing of N40°00'00" E as shown hereon.

3. NOTICE: The bearing of the area included in the Replat of Lot 151A was assumed to be the record bearing of N40°00'00" E as shown hereon.

4. NOTES OF CLARIFICATION: a. The configuration of the following Lots, tracts, and rights of way have been modified by this Replat.

b. The following Lots, tracts, and rights of way have been deleted by this Replat: Lot 151A, 151B, 151C.

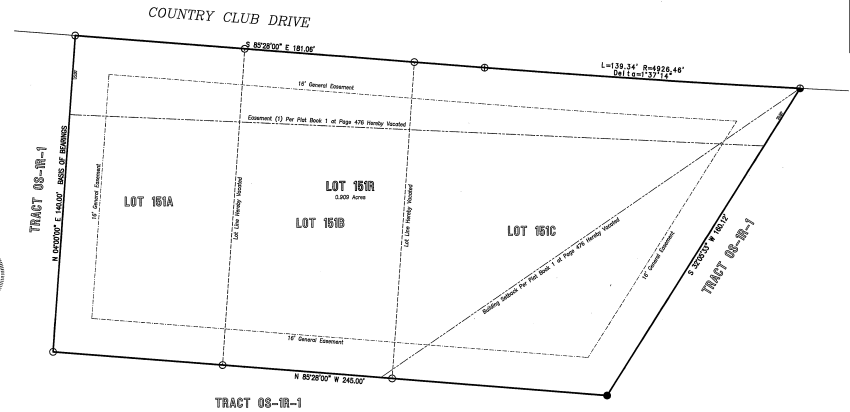
c. The following Lots, tracts, and rights of way have been created by this Replat: Lot 151R.

d. Land Use Designation: Lot 151R is designated as 151R Single Family Residential.

e. The approval of this Replat vacates all prior plats for the area described by this Replat.

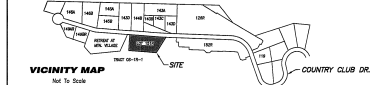
f. The roof-edge height of the units as measured from the street is limited to the same elevation as the approved structure located on the adjacent Lot 150 also measured from street level, so that the street-view conditions is consistent building height.

g. NOTICE: According to Colorado law you must commence any legal action based upon defect in this survey within three years after you first discover such defect. In no event may any action based upon any defect in this survey be commenced more than ten years from the date of the certification shown hereon.



LEGEND: Filled circle: Front 1/2\"/>

416497 REPLAT LOT 151-R MOUNTAIN VILLAGE. SCALE: 1\"/>



416497 REPLAT LOT 151-R MOUNTAIN VILLAGE. State of Colorado, County of San Miguel. My commission expires 11/21/11.

SECURITY INTEREST HOLDERS' CONSENT

The undersigned Alpha Bank, a Colorado Banking Corporation, as a security holder of a deed of trust which constitutes a lien upon the decedent's property, recorded at Reception No. 407432...

Name: Chris Mendenhall. Date: 2/15/11. Address: 120 S. Pine St. Telluride.

Signature: [Signature]. Title: Alpha Bank U.P.

ACKNOWLEDGMENT: State of Colorado, County of San Miguel.

The foregoing signature was acknowledged before me this 15th day of February, 2011 A.D. by Chris Mendenhall.

My commission expires 2/11/2015. Witness my hand and seal.

Notary Public: JACQUELINE WIRTHENBACH, STATE OF COLORADO.

ACKNOWLEDGMENT: State of Colorado, County of San Miguel.

The foregoing signature was acknowledged before me this 15th day of February, 2011 A.D. by Greg Spitzer as Manager of the Town of Mountain Village.

My commission expires 2/11/2015. Witness my hand and seal.

Notary Public: JACQUELINE WIRTHENBACH, STATE OF COLORADO.

TOWN OF MOUNTAIN VILLAGE APPROVAL

I, Robert Daines as Mayor, and Greg Spitzer as Manager, of the Town of Mountain Village, Colorado, do hereby certify that this Replat has been approved by the Town Council in the same resolution that has authorized and directed us to execute this Replat.

Name: Chris Mendenhall. Date: 2/15/11. Address: 120 S. Pine St. Telluride.

Signature: [Signature]. Title: Alpha Bank U.P.

ACKNOWLEDGMENT: State of Colorado, County of San Miguel.

The foregoing signature was acknowledged before me this 15th day of February, 2011 A.D. by Greg Spitzer as Manager of the Town of Mountain Village.

My commission expires 2/11/2015. Witness my hand and seal.

Notary Public: JACQUELINE WIRTHENBACH, STATE OF COLORADO.

ACKNOWLEDGMENT: State of Colorado, County of San Miguel.

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My commission expires 2/11/2015. Witness my hand and seal.

Notary Public: JACQUELINE WIRTHENBACH, STATE OF COLORADO.

GRANT OF EASEMENT

The Owner hereby grants to the Town of Mountain Village (the "Town"), their successors and assigns, a perpetual easement, 16 feet in width over, across and under all areas described as 16' General Easement on this Replat for any and all uses, improvements and a facilities deemed necessary by the Town...

Name: Chris Mendenhall. Date: 2/15/11. Address: 120 S. Pine St. Telluride.

Signature: [Signature]. Title: Alpha Bank U.P.

ACKNOWLEDGMENT: State of Colorado, County of San Miguel.

The foregoing signature was acknowledged before me this 15th day of February, 2011 A.D. by Greg Spitzer as Manager of the Town of Mountain Village.

My commission expires 2/11/2015. Witness my hand and seal.

Notary Public: JACQUELINE WIRTHENBACH, STATE OF COLORADO.

ACKNOWLEDGMENT: State of Colorado, County of San Miguel.

The foregoing signature was acknowledged before me this 15th day of February, 2011 A.D. by Greg Spitzer as Manager of the Town of Mountain Village.

My commission expires 2/11/2015. Witness my hand and seal.

Notary Public: JACQUELINE WIRTHENBACH, STATE OF COLORADO.

BUILDING SETBACK VACATION AND EASEMENT (1) VACATION

The undersigned being the beneficiaries of record of those portions of land labeled as Building Setback and Easement (1), as depicted on the plat of Telluride Mountain Village, Tract 1 filed in the office of the Clerk and Recorder of San Miguel County in Plat Book 1 of page 476-488 and on the replat of Lot 151, Telluride Mountain Village, Tract 1, filed in the office of the Clerk and Recorder of San Miguel County in Plat Book 1, page 776-777, do hereby vacate and relinquish said Building Setback and Easement (1) as shown recited on this Replat.

Name: Chris Mendenhall. Date: 2/15/11. Address: 120 S. Pine St. Telluride.

Signature: [Signature]. Title: Alpha Bank U.P.

ACKNOWLEDGMENT: State of Colorado, County of San Miguel.

The foregoing signature was acknowledged before me this 15th day of February, 2011 A.D. by Robert Daines as Mayor of the Town of Mountain Village.

My commission expires 10/19/2011. Witness my hand and seal.

Notary Public: JACQUELINE WIRTHENBACH, STATE OF COLORADO.

ACKNOWLEDGMENT: State of Colorado, County of San Miguel.

The foregoing signature was acknowledged before me this 15th day of February, 2011 A.D. by Greg Spitzer as Manager of the Town of Mountain Village.

My commission expires 2/11/2015. Witness my hand and seal.

Notary Public: JACQUELINE WIRTHENBACH, STATE OF COLORADO.

TREASURER'S CERTIFICATE

I, the undersigned, Treasurer of the County of San Miguel, do hereby certify that according to the records of the San Miguel County Treasurer there are no liens against the subdivision, or any part thereof, for unpaid state, county municipal or local taxes or special assessments due and payable, in accordance with Land Use Code Section 3-101.

Name: Chris Mendenhall. Date: 2/15/11. Address: 120 S. Pine St. Telluride.

Signature: [Signature]. Title: Alpha Bank U.P.

ACKNOWLEDGMENT: State of Colorado, County of San Miguel.

The foregoing signature was acknowledged before me this 15th day of February, 2011 A.D. by Robert Daines as Mayor of the Town of Mountain Village.

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ACKNOWLEDGMENT: State of Colorado, County of San Miguel.

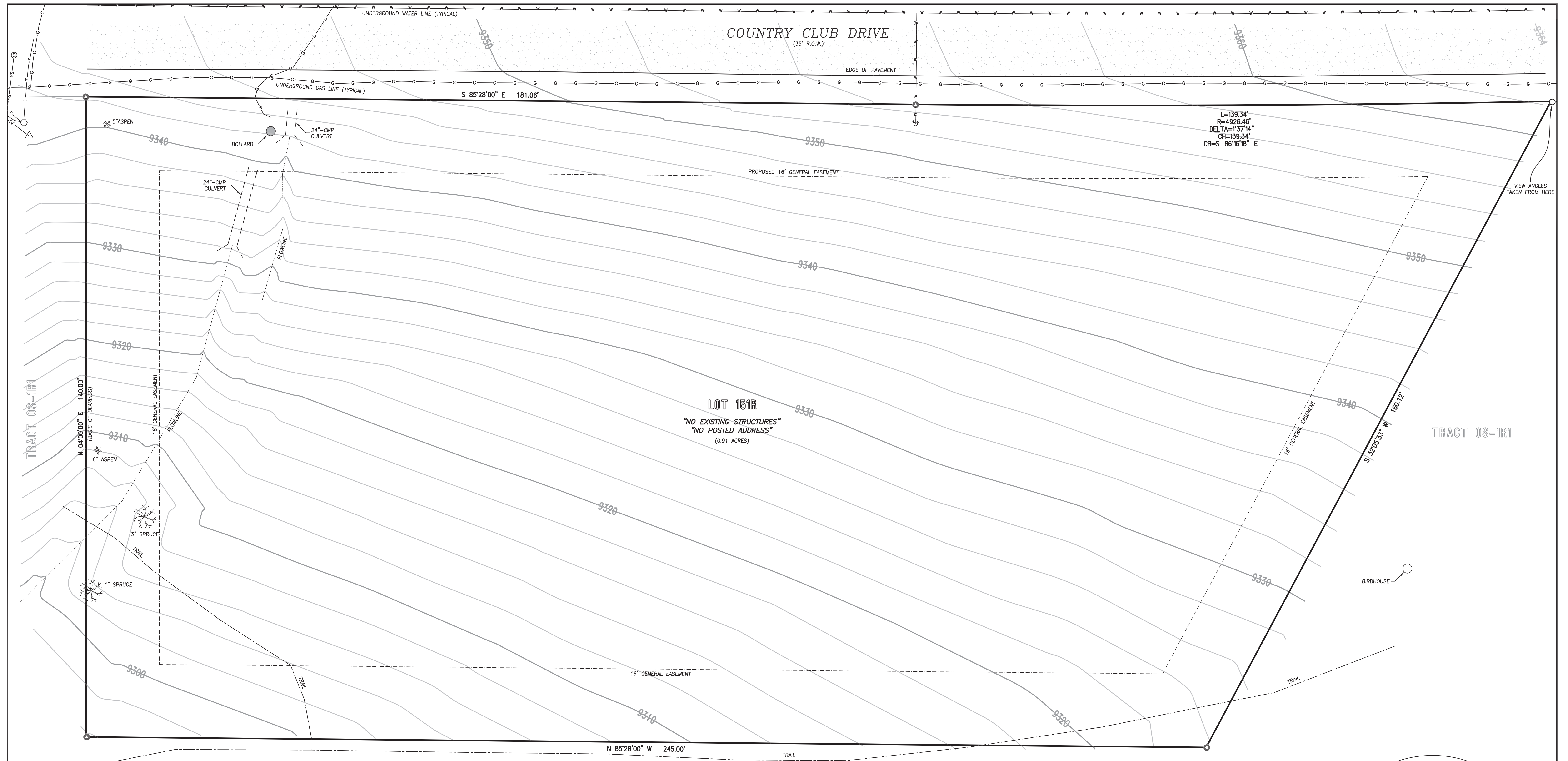
The foregoing signature was acknowledged before me this 15th day of February, 2011 A.D. by Greg Spitzer as Manager of the Town of Mountain Village.

My commission expires 2/11/2015. Witness my hand and seal.

Notary Public: JACQUELINE WIRTHENBACH, STATE OF COLORADO.

LOT 151R, A REPLAT OF LOTS 151A, 151B AND 151C, TELLURIDE MOUNTAIN VILLAGE, FILING No. 1 LOCATED WITHIN THE SE 1/4 OF THE SW 1/4 OF SECTION 34, T.43N, R.9W, N.M.P.M., LYING WITHIN THE INCORPORATED TOWN OF MOUNTAIN VILLAGE, SAN MIGUEL COUNTY, COLORADO

Project Map, Title Block, and Recorder's information. Includes Project Map, Title Block, Recorder's Name (Foley Associates, Inc.), and recording details.

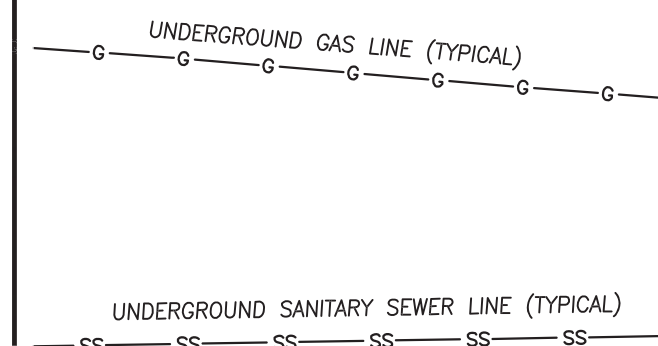


L=139.34'
R=4926.46'
DELTA=137.14°
CH=139.34'
CB=S 86°16'18" E

LOT 151R
"NO EXISTING STRUCTURES"
"NO POSTED ADDRESS"
(0.91 ACRES)

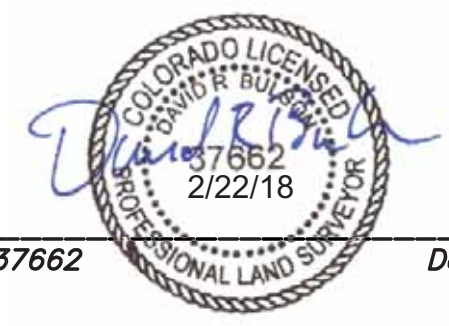
LEGEND

	WATER VALVE
	CURB STOP
	SEWER MANHOLE
	TELEPHONE PEDESTAL
	CABLE-TV PEDESTAL
	FOUND 1-1/2" ALUMINUM CAP ON No. 5 REBAR, L.S. 20632
	FOUND 1-1/2" ALUMINUM CAP ON No. 5 REBAR, L.S. 37662
	FOUND 1-1/2" ALUMINUM CAP ON No. 5 REBAR, L.S. 24954
	FOUND No. 5 REBAR, NO CAP



SURVEYOR CERTIFICATE:

This topographic survey of Lot 151R, Town of Mountain Village, is hereby certified to The Retreat at Mountain Village III, LLC, A Colorado Limited Liability Company. This property was field surveyed on February 6, 2018 under the direct responsibility, supervision and checking of David R. Bulson of Foley Associates, Inc., being a Colorado Licensed Surveyor. It does not constitute a Land Survey Plat or Improvement Survey Plat as defined by section 38-51-102 C.R.S.



P.L.S. NO. 37662 Date

PROPERTY DESCRIPTION:

LOT 151R, TELLURIDE MOUNTAIN VILLAGE, FILING 1, ACCORDING TO THE REPLAT OF LOTS 151A, 151B AND 151C, TELLURIDE MOUNTAIN VILLAGE, FILING NO. 1 RECORDED FEBRUARY 16, 2011 IN PLAT BOOK 1 AT PAGE 4436,

COUNTY OF SAN MIGUEL, STATE OF COLORADO.

NOTES:

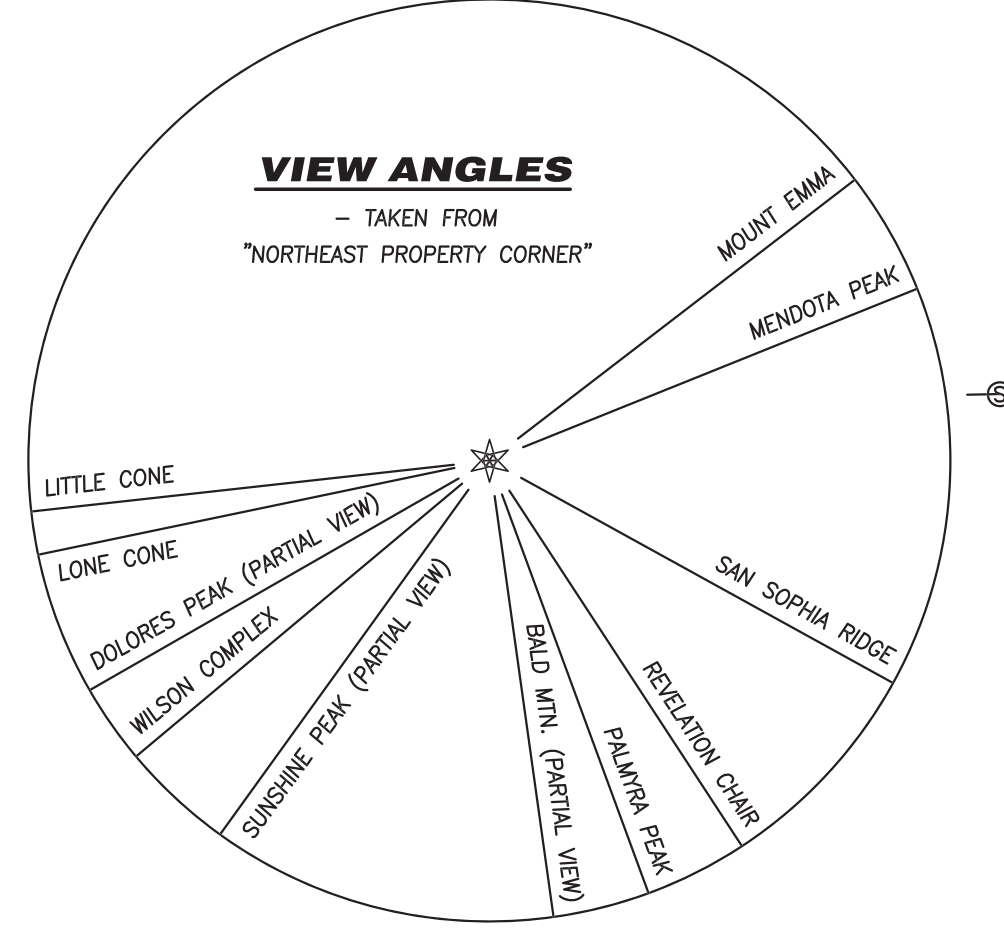
- Easement research and property description from Land Title Guarantee Company, Order Number TLR86006734, dated February 02, 2017 at 5:00 P.M.
- According to FEMA Flood Insurance Rate Map 08113C0287-D, Panel Number 0287 D, dated September 30, 1992, this parcel is within Zone X; Areas determined to be outside 500-year flood plain.

NOTES (cont.):

- Bearings for this survey based on monuments found along the western boundary of Lot 151R, as shown hereon, assumed to have the record bearing of N 04°00'00" E according to Plat Book 1 at page 4436 in the office of the San Miguel County Clerk and Recorder.
- Lineal units represented hereon are shown in U.S. Survey Feet or a decimal portion thereof.
- BENCHMARK: Control Point 'CP 14-2', a magnetic nail with an elevation of 9369.46 feet, is located in the pavement on the south side of Country Club Drive and ± 90 feet east of the northeast corner of Lot 151R.
- Contour interval is two feet.
- This survey is valid only if a print or electronic copy has a seal and signature of the surveyor noted within the statement above.
- Any person who knowingly removes, alters, or defaces any public land survey monument and/or boundary monument or accessory, commits a class two (2) misdemeanor pursuant to C.R.S. 18-4-508.

NOTES (cont.):

- The word certify as used hereon means an expression of professional opinion regarding the facts of this survey and does not constitute a warranty or guarantee, expressed or implied.
- This survey is prepared for the exclusive use of the party or parties indicated within the surveyor's statement. Said statement does not extend to any unnamed person or parties without an express statement by the surveyor naming said entities.
- Warranty Deed recorded at Book 412, Page 196, San Miguel County Clerk and Recorder, requires that the Southern portion of this Property shall be sodded with Kentucky Bluegrass.
- NOTICE: According to Colorado law, you must commence any legal action based upon any defect in this survey within three years after you first discover such defect. In no event may any action based upon any defect in this survey be commenced more than ten years from the date of the certification shown hereon.



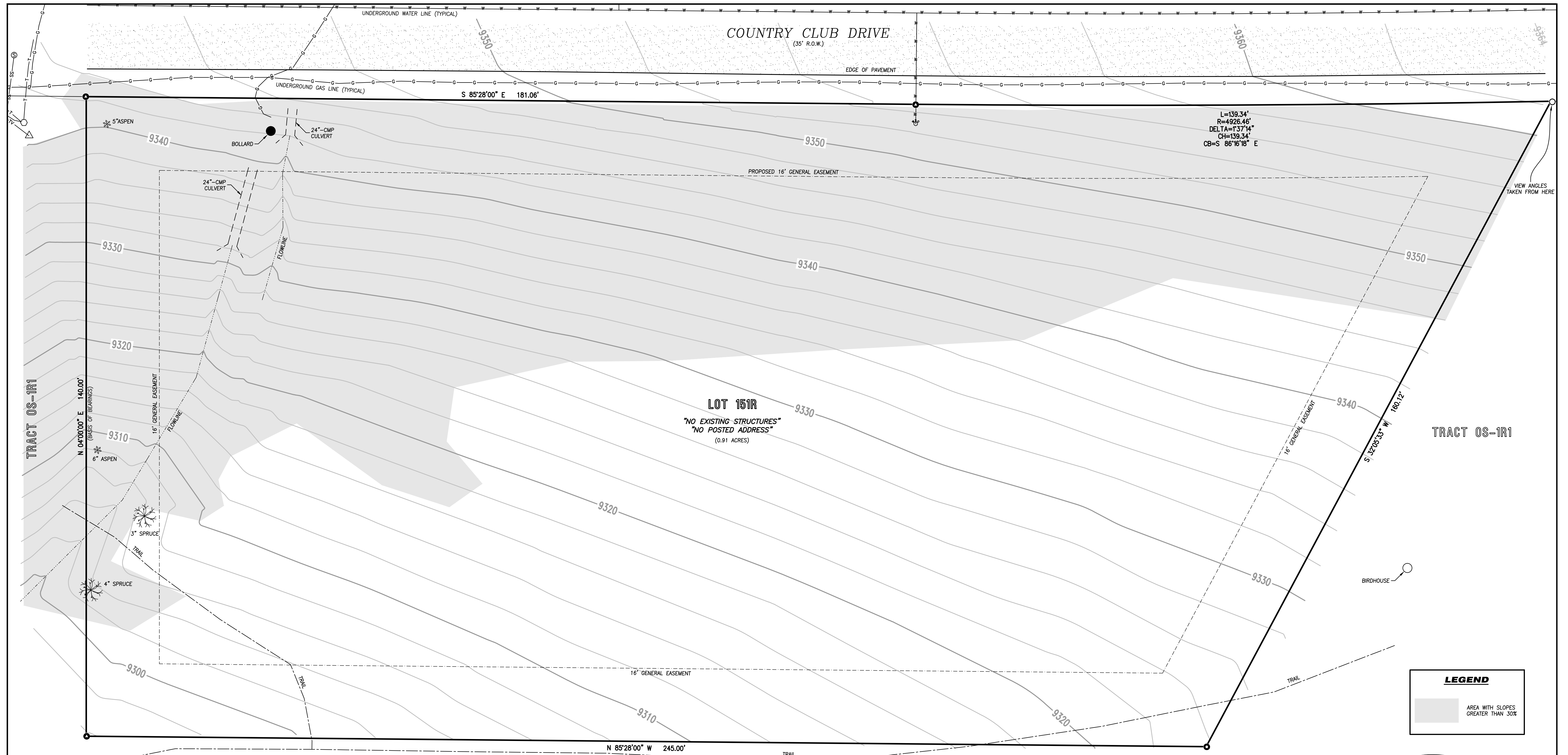
TOPOGRAPHIC SURVEY
Lot 151R, Town of Mountain Village,
San Miguel County, Colorado.

Project Mgr:	DB	Rev.	description	date	by
Technician:	MC				
Checked by:					
Start date:	02/06/2018				



970-728-6153 970-728-6050 fax
P.O. BOX 1385
125 W. PACIFIC, SUITE B-1
TELLURIDE, COLORADO 81435

Drawing path: dws\8917 TOPO 02-18.dwg
Sheet 1 of 1 Project #: 8917



L=139.34'
R=4926.46'
DELTA=137.14°
CH=139.34'
CB=S 86°16'18" E

LOT 151R
"NO EXISTING STRUCTURES"
"NO POSTED ADDRESS"
(0.91 ACRES)

TRACT OS-1R1

LEGEND

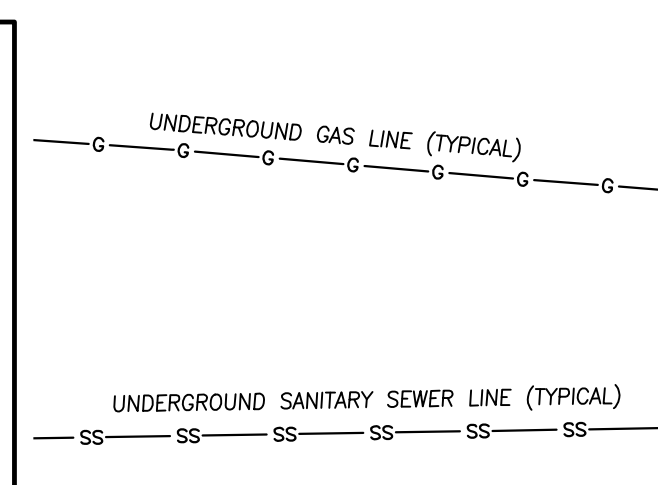
AREA WITH SLOPES GREATER THAN 30%

LEGEND

- W WATER VALVE
- C CURB STOP
- S SEWER MANHOLE
- O TELEPHONE PEDESTAL
- △ CABLE-TV PEDESTAL
- FOUND 1-1/2" ALUMINUM CAP ON No. 5 REBAR, L.S. 20632
- FOUND 1-1/2" ALUMINUM CAP ON No. 5 REBAR, L.S. 37662
- FOUND 1-1/2" ALUMINUM CAP ON No. 5 REBAR, L.S. 24954
- FOUND No. 5 REBAR, NO CAP

SCALE: 1" = 10'

0 2 4 6 8 10 20



SURVEYOR CERTIFICATE:

This topographic survey of Lot 151R, Town of Mountain Village, is hereby certified to The Retreat at Mountain Village III, LLC, A Colorado Limited Liability Company. This property was field surveyed on February 6, 2018 under the direct responsibility, supervision and checking of David R. Bulson of Foley Associates, Inc., being a Colorado Licensed Surveyor. It does not constitute a Land Survey Plat or Improvement Survey Plat as defined by section 38-51-102 C.R.S.

P.L.S. NO. 37662 Date _____

PROPERTY DESCRIPTION:

LOT 151R, TELLURIDE MOUNTAIN VILLAGE, FILING 1, ACCORDING TO THE REPLAT OF LOTS 151A, 151B AND 151C, TELLURIDE MOUNTAIN VILLAGE, FILING NO. 1 RECORDED FEBRUARY 16, 2011 IN PLAT BOOK 1 AT PAGE 4436.

COUNTY OF SAN MIGUEL, STATE OF COLORADO.

NOTES:

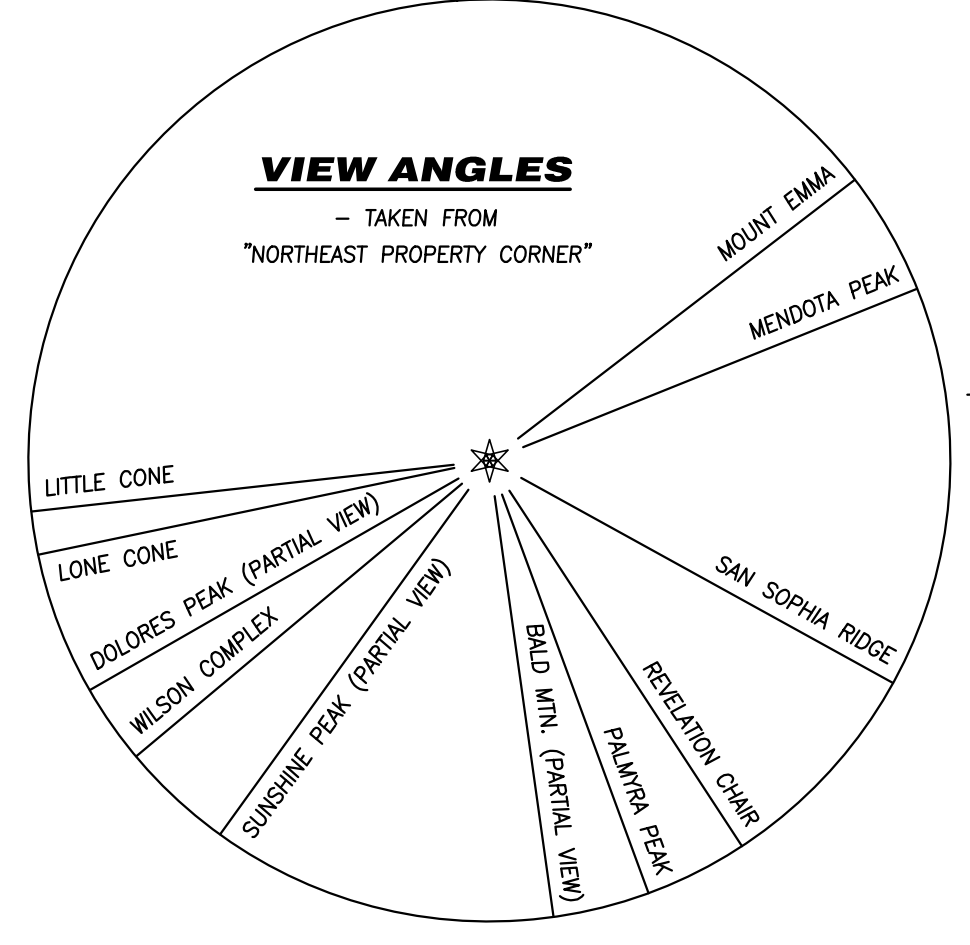
- Easement research and property description from Land Title Guarantee Company, Order Number TLR86006734, dated February 02, 2017 at 5:00 P.M.
- According to FEMA Flood Insurance Rate Map 08113C0287-D, Panel Number 0287 D, dated September 30, 1992, this parcel is within Zone X; Areas determined to be outside 500-year flood plain.

NOTES (cont.):

- Bearings for this survey based on monuments found along the western boundary of Lot 151R, as shown hereon, assumed to have the record bearing of N 04°00'00" E according to Plat Book 1 at page 4436 in the office of the San Miguel County Clerk and Recorder.
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NOTES (cont.):

- The word certify as used hereon means an expression of professional opinion regarding the facts of this survey and does not constitute a warranty or guarantee, expressed or implied.
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- NOTICE: According to Colorado law, you must commence any legal action based upon any defect in this survey within three years after you first discover such defect. In no event may any action based upon any defect in this survey be commenced more than ten years from the date of the certification shown hereon.



TOPOGRAPHIC SURVEY / SLOPE STUDY
Lot 151R, Town of Mountain Village,
San Miguel County, Colorado.

Project Mgr:	DB	Rev.	description	date	by
Technician:	MC				
Checked by:					
Start date:	04/09/2018				



970-728-6153 970-728-6050 fax
P.O. BOX 1385
125 W. PACIFIC, SUITE B-1
TELLURIDE, COLORADO 81435

Drawing path: dwg\8917 SLOPE STUDY 04-18.dwg Sheet 1 of 1 Project #: 8917



Civil, Structural & Geotechnical Engineers

222 South Park Ave. Montrose, CO 81401
(970) 249-6828 FAX (970) 249-0945

Billie copy

SOIL REPORT
LOT 150, TELLURIDE MOUNTAIN VILLAGE
DON MEEKS
TELLURIDE, COLORADO

On May 14, 1998, an investigation of the soil and site conditions was conducted by Buckhorn Geotech, Inc., on Lot 150 of the Telluride Mountain Village near Telluride, Colorado. This was performed at the request of the owner, Mr. Don Meeks. The purpose for the investigation was to evaluate the property for its suitability for the construction of a 4-story duplex building. The investigation consisted of a site inspection; excavation of two (2) test pits to depths of twelve (12) and fourteen (14) feet; laboratory testing of collected soil samples, analysis of available data; and report preparation.

Construction Plans

At this time, we understand that Mr. Meek's architectural firm, Kaufman Meeks, Inc., is designing the plans for the duplexes to be constructed on this lot. For this study, we focused on the first of two duplexes, called Phase I on the architectural drawings. The duplex will be a four-story frame structure with heavy timber trusses and stonework on the exterior. It is anticipated that the structure will transfer loads of about 2,000 to 3,000 pounds per linear foot to a continuous footing. Concentrated loads will probably range around 25,000 to 35,000 pounds.

Site Conditions

Lot 150 is located in the lower portion of the mountain in the Village at an average elevation of approximately 9,320 feet above mean sea level. Based upon that elevation, the Structural Engineers Association of Colorado recommends that the Basic Snow Design Load be a minimum of 90 pounds per square foot. The property is situated along the south side of Country Club Drive near its end at the cul-de-sac. The home site rests

upon an relatively steep slope of 37.5% downward to the south. There is a small bench just above the building site along the road and another small one at the foot of the site. The slope continues to drop steeply away from the building to the south across the remainder of the property. Existing topography on the property directs surface runoff downward to the south and into a draw which conveys runoff westward. The slope continues above Country Club Drive until it tops out along an east-west trending ridge.

Lot 150 contains a ground cover of native grasses. There are no signs of slope instability such as hummocks, slumps scars or surface cracks in the soil.

Geology

The San Juan Mountains of southwestern Colorado are an uplifted dome of Paleozoic and Mesozoic sedimentary formations that have been capped by tertiary volcanics. Near Telluride, the uplifting that accompanied the volcanic eruptions caused local warping and folding of the older sedimentary beds. As magma rose towards the ground surface, some migrated through the deeper fractures in the sedimentary beds forming a network of dikes and sills. Some of the faults were injected with mineralized fluids that formed the gold and silver veins that made the area a rich mining district.

In the many hundreds of thousands of years since the dikes were formed, much of the overlying deposits of sedimentary rock have been weathered and stripped away by erosion, landslides, and glaciation to create the dramatic present landscape. There have been no major landslides or other large-scale mass movements since the end of the last glacial period.

There are no active faults known to exist in the Telluride area. According to the Uniform Building Code, southwestern Colorado is in Seismic Risk Zone 1 where distant earthquakes would be expected to cause only minor damage to structures with fundamental periods of vibration greater than 1.0 seconds. The structure planned for this property will not fall into this category.

Based upon the area's general 1980 geologic study by Lincoln De Vore, the material deposited on the mountain on the west half of Lot 150 have been classified as Mancos Shale (Cretaceous) and the east half of the lot have been classified as Recent (Quaternary) Landslide material. This would indicate that the Phase 1 duplex is on more recent

landslide debris while Phase 2 is on Mancos Shale. Observations of the subsurface conditions were only made at the Phase 1 site as requested by Mr. Meeks, and the soil and rock types observed there support this classification of mixed clays/shales overlying Mancos Shale bedrock. Both test pits indicated about 5 to 6 feet of mixed soils, indicative of landslide material overlying weathered shale and increasingly formational Mancos Shale bedrock.

Soils

The two test pits were excavated in the proximity of the footprint of the home site. Test Pit #1 was excavated along the west edge of the building site and Test Pit #2 was excavated along the east edge of the building site (see attached site plan and soil logs).

The soils encountered with the excavation of Test Pit #1 consisted of almost a foot of organic, silty loam topsoil. With the native grass cover, there is not excessive organic buildup in this surface layer. Below the topsoil is about 4.5 feet of a highly fractured shale with distinctive clay lenses randomly scattered throughout. An undisturbed drive sample was taken in this pit at a depth of 4 feet in a large clay lens. This clay is dark brown with red/orange weathered sandstone pebbles. When tested for resistance to penetration, the clay soil demonstrated a resistance to penetration of 2.5 tons per square foot (tsf) and a resistance to shear stress of 1.0 tsf. A sample of this material was transported to our lab and tested for swell and consolidation (see sample "BV" on Swell/Consolidation Test graph). At its natural moisture content (16.81%), the soil density is 108.26 pounds per cubic foot (pcf). In the presence of water and a static load of 100 psf, the sample swelled a minimal amount (0.15%). The sample was progressively loaded until a total of 2,000 psf was achieved. At this load, the total consolidation of the sample was 2.86%. The final moisture content of the sample was 19.80% with a density of 113.53 pcf.

In Test Pit #1, at a depth of about 5 feet below existing grade, water was seeping into the excavated pit from atop the clay. Below this, until a depth of 12 feet, was a uniform layer of highly fractured shale. This is formational Mancos shale in a slightly weathered state. At a depth of 12 feet, the shale became much harder. This rock was less fractured than the overlying 7 feet of shale and it became "tighter" and quite dense. Excavation was terminated at 14 feet.

The soils encountered with the excavation of Test Pit #2 consisted of 8-12 inches of organic, silty loam topsoil. With the native grass cover, there is not excessive organic buildup in this surface layer. Below the topsoil is about 2.0 feet of a sandy clay underlain by almost 2.0 feet of highly fractured shale. An undisturbed drive sample was taken in this pit at a depth of 4 feet within the fractured shale layer. A sample of this material was transported to our lab and tested for swell and consolidation (see sample "KP" on Swell/Consolidation Test graph). At its natural moisture content (17.74%), the soil density is 98.60 pounds per cubic foot (pcf). In the presence of water and a static load of 100 psf, the sample swelled a minimal amount (0.02%). The sample was progressively loaded until a total of 2,000 psf was achieved. At this load, the total consolidation of the sample was 3.04%. The final moisture content of the sample was 21.80% with a density of 104.31 pcf.

At a depth of 5 feet in Test Pit #2 there was a lens of yellowish-brown clay. Below this was another 2.5 feet of highly fractured shale which was a little tighter/denser than the shale encountered at 3-5 feet. This is formational Mancos Shale in a slightly weathered

state. This material is hard yet friable when stressed/bent. From 8 to 12 feet, the shale became denser with depth. Excavation was terminated at 12 feet.

Based upon our analysis and experience with similar conditions in the Telluride area, the following soil design parameters are offered:

Allowable bearing capacity	2000 psf
Active earth pressure	42 pcf*
Passive earth pressure	275 pcf*
At rest earth pressure	61 pcf*
Coefficient of friction	0.28**

*equivalent fluid pressure

**Concrete on soil

These values are based upon the material encountered within our test pits. Appropriate safety factors and loadings related to sloping backfill are not included in these values and should be considered in the design phase. Imported material will have different fluid equivalent values and if used for backfill situations, should be separately evaluated for basement or retaining wall design.

CONCLUSIONS AND RECOMMENDATIONS

Based upon our site inspection and the results of the shallow soil exploration, it appears that the site is suited for development of the multi-story duplex planned. The foundation should extend into the highly fractured formational Mancos shale at the relatively shallow depths indicated herein. This can be accomplished with a spread footing. The soil conditions are suited for the design of a framed floor and a crawl space or slab-on-grade floor system. The following recommendations are offered to enhance the long-term stability of the construction project.

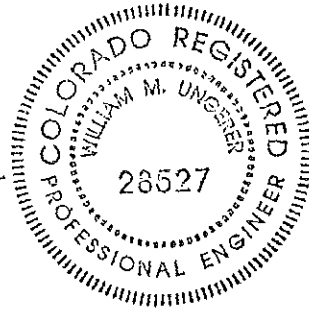
- ◆ As much as practical, the native vegetation on the property should be maintained, to provide continued slope stability and erosion control. Additional shrubs and trees can be added to enhance slope stability and provide privacy.
- ◆ In order to provide a uniform bearing surface for spread footings, we recommend that the footing excavations extend into the dense fractured formational shales that we encountered at about six (6) feet below finished grade. If desired, we will be glad to

observe the excavations at the time of foundation preparation to advise of suitable conditions.

- ◆ The disturbed excavation should be "proof-rolled" using jumping-jack type soil consolidation equipment. Soft or yielding spots should be consolidated using the same equipment so as to create a uniformly dense founding surface for the construction of the spread footings and stem walls.
- ◆ The applied soil loads from footings to soil should not exceed 2000 psf and the loads should be balanced to within ± 500 pounds (dead load plus 1/2 live load).
- ◆ The exterior foundation should extend at least 48 inches below finished grade to protect against frost damage.
- ◆ The footing/stemwall assembly should be designed to clear span a distance of at least 10 feet.
- ◆ If a concrete slab floor system is used, the soil beneath the slab should be excavated to grade and all organic material and areas of soft or yielding soil removed. All slabs should be placed upon fill of at least 4 inches thick (3/4 inch minus washed rock is ideal). If any fill is required, either as backfill against stem walls or in low places, the native soil should not be used. Suitable structural material should be imported to the site.
- ◆ Exterior concrete flatwork should be designed and constructed so that it drains freely away from the structure. If fill is needed, it should consist of gravelly soil free of clay placed in 6-inch lifts and compacted to 90% of Standard Proctor Density.
- ◆ Site drainage should be controlled so that surface water is removed from the site and not allowed to accumulate or stand anywhere near the building foundation either during or after completion of construction. This includes water from landscaped areas, patios, decks, and roofs. Drainage plans should insure that snow melt and rain runoff are conveyed around the building and safely away from the structure.
- ◆ Foundation drains should be included as a part of the foundation system. Subsurface water should be intercepted at the soil/basement wall interface and conveyed to a location well below the footprint of the building.

If any soils or site conditions are encountered during excavation that differ from the soils and site conditions described herein, we should be called immediately and construction stopped until the situation has been evaluated. Construction should be resumed only when remedies or design adjustments, as necessary, have been prescribed.

Respectfully Submitted,
June 9, 1998



William M. Ungerer, P.E.

WMU/lbh

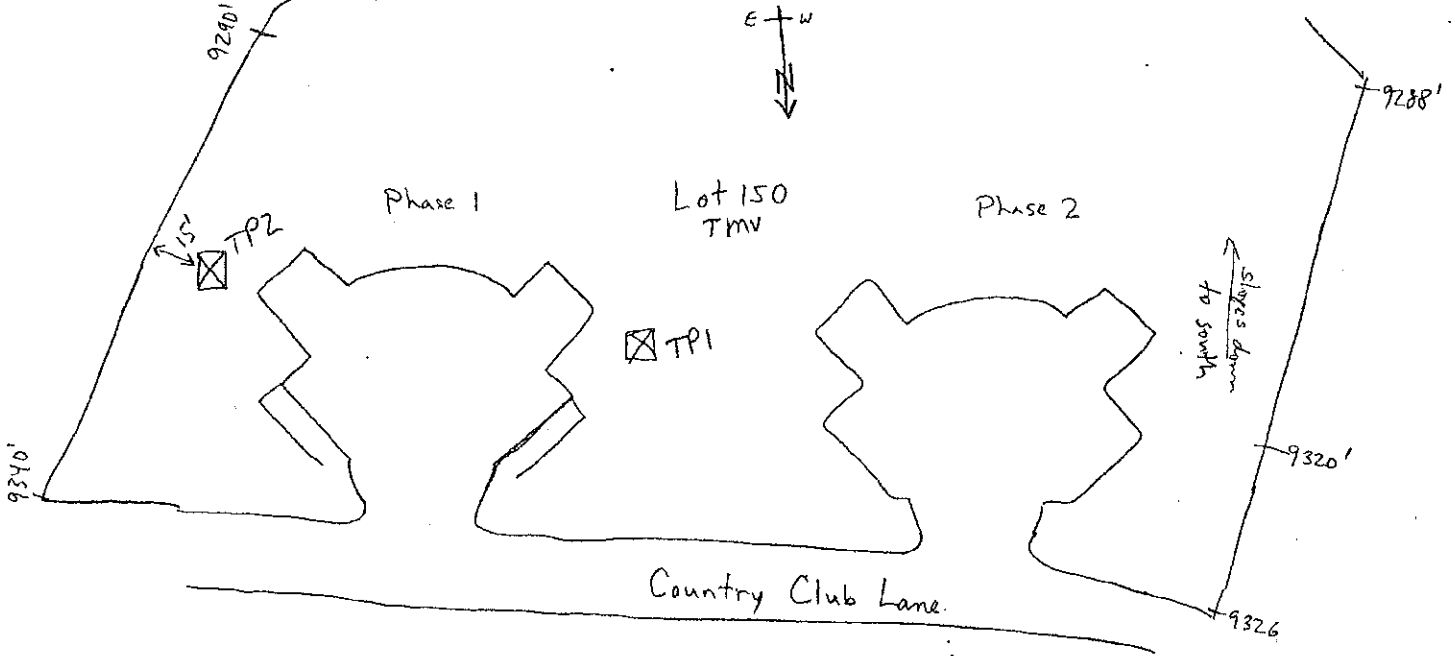
Enclosures: Site Plan, Soil Logs, Swell/Consolidation test graphs

FIELD FORM

Location: Lot 150 Tmv Client: Don Meeks Project # 98154
Excavation Company/Contact: Williams Date: 5/14/98
Other notes: field inspection by BU. Pit 1+2 of 2

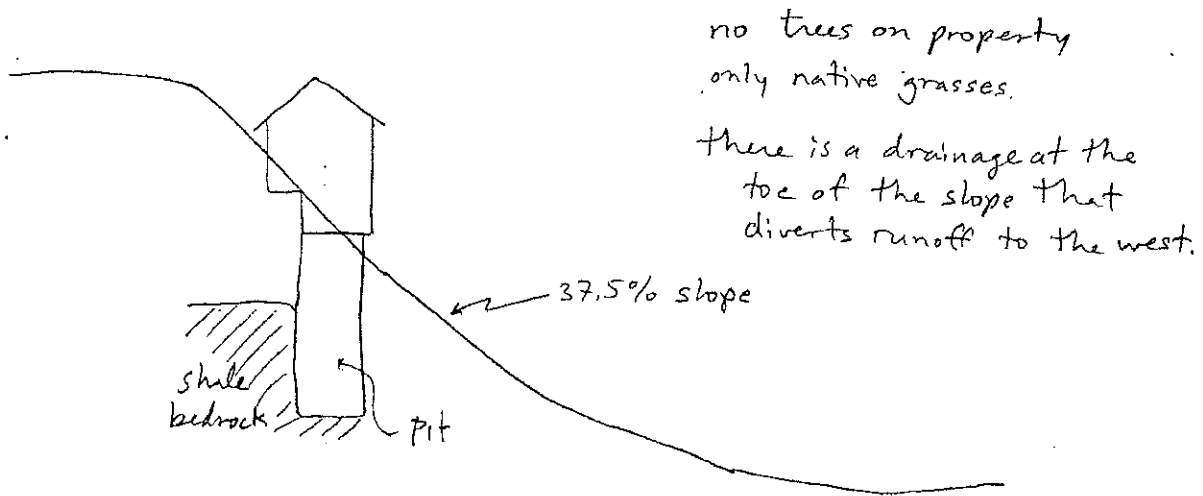
A. Overhead Site Map:

(note location of pits, proposed foundation, drainage patterns, roads, significant vegetation, other features)

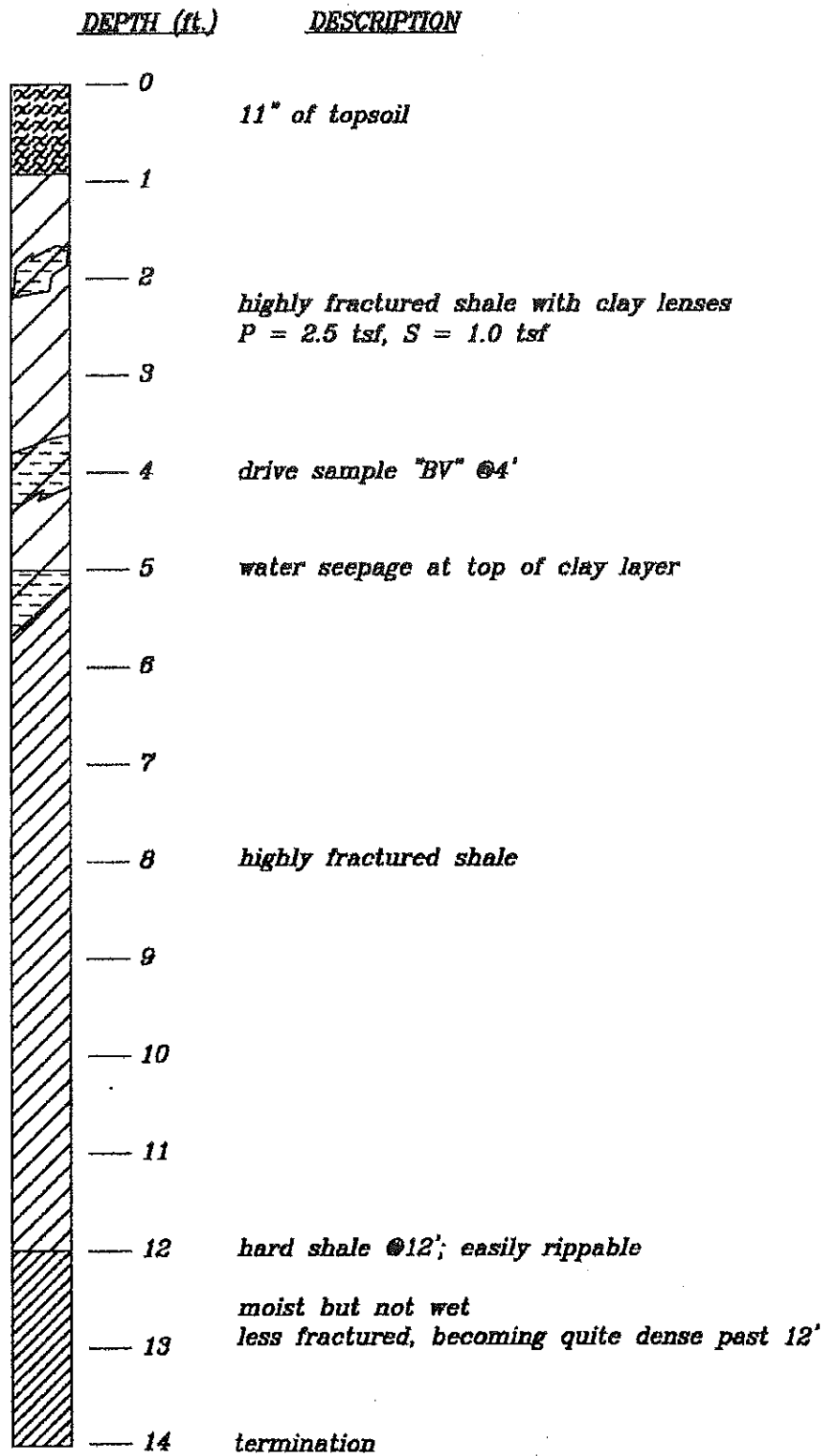


B. Cross-Section Site Map:

(Note slope above/below site, drainage patterns, location of pits, other features)



SOIL LOG TEST PIT #1



DRAWING NUMBER 1 OF 2	Field Testing
	H. Ungerer
	Lab/Drafting
	L. Hauptmann
	DATE
	5/14/88

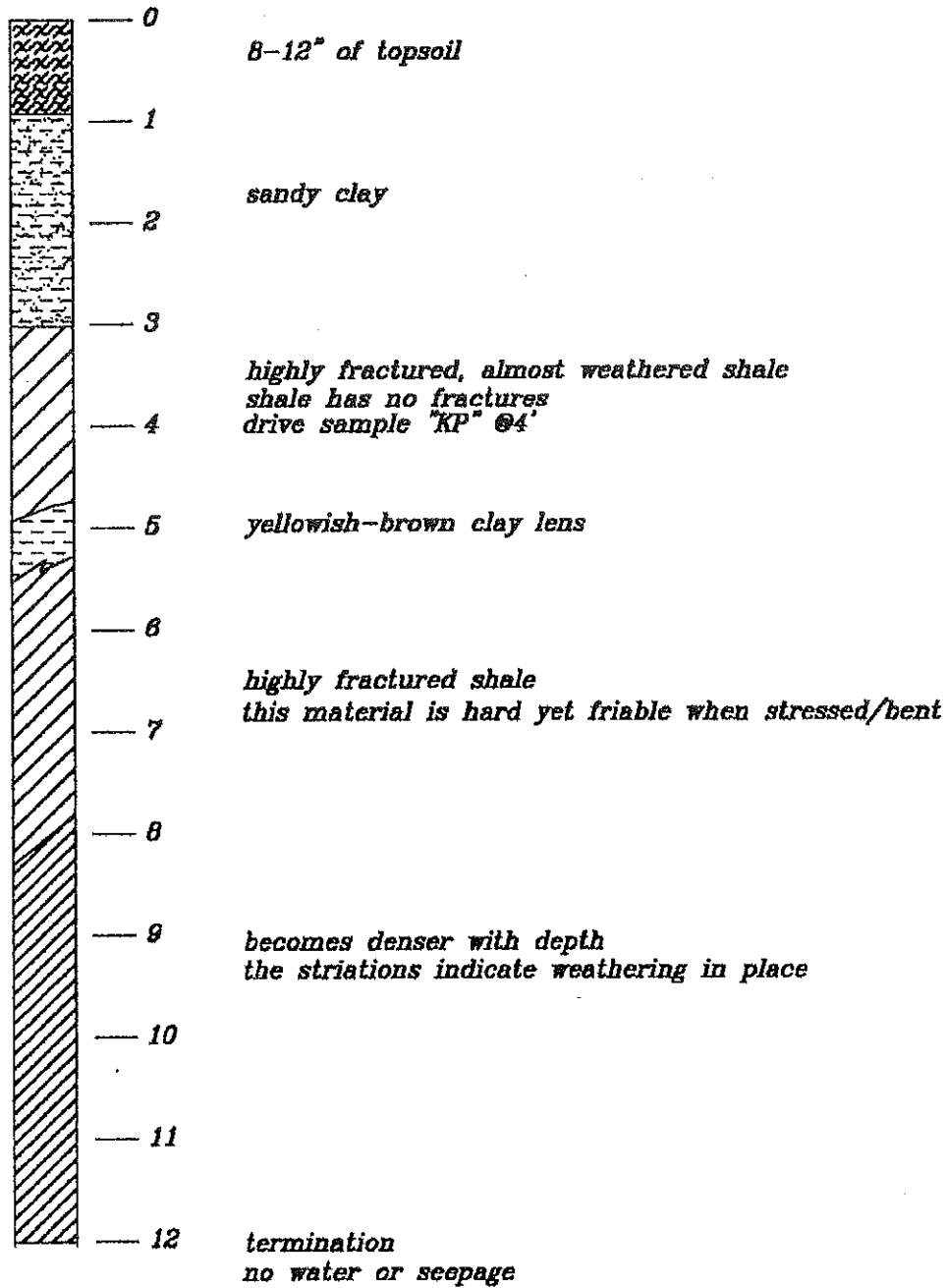
Don Meeks
 Lot 150
 Telluride Mtn. Village

BUCKHORN GEOTECH

Civil, Structural & Geotechnical Engineers
 222 South Park Ave. Montross, Colorado 81401
 970-248-0828 Fax. No. 970-248-0845

SOIL LOG TEST PIT #2

DEPTH (ft.) DESCRIPTION



DRAWING NUMBER 2 OF 2	Field Testing	B. Ungerer
	Lab/Drafting	L. Hauptmann
	DATE	5/14/88

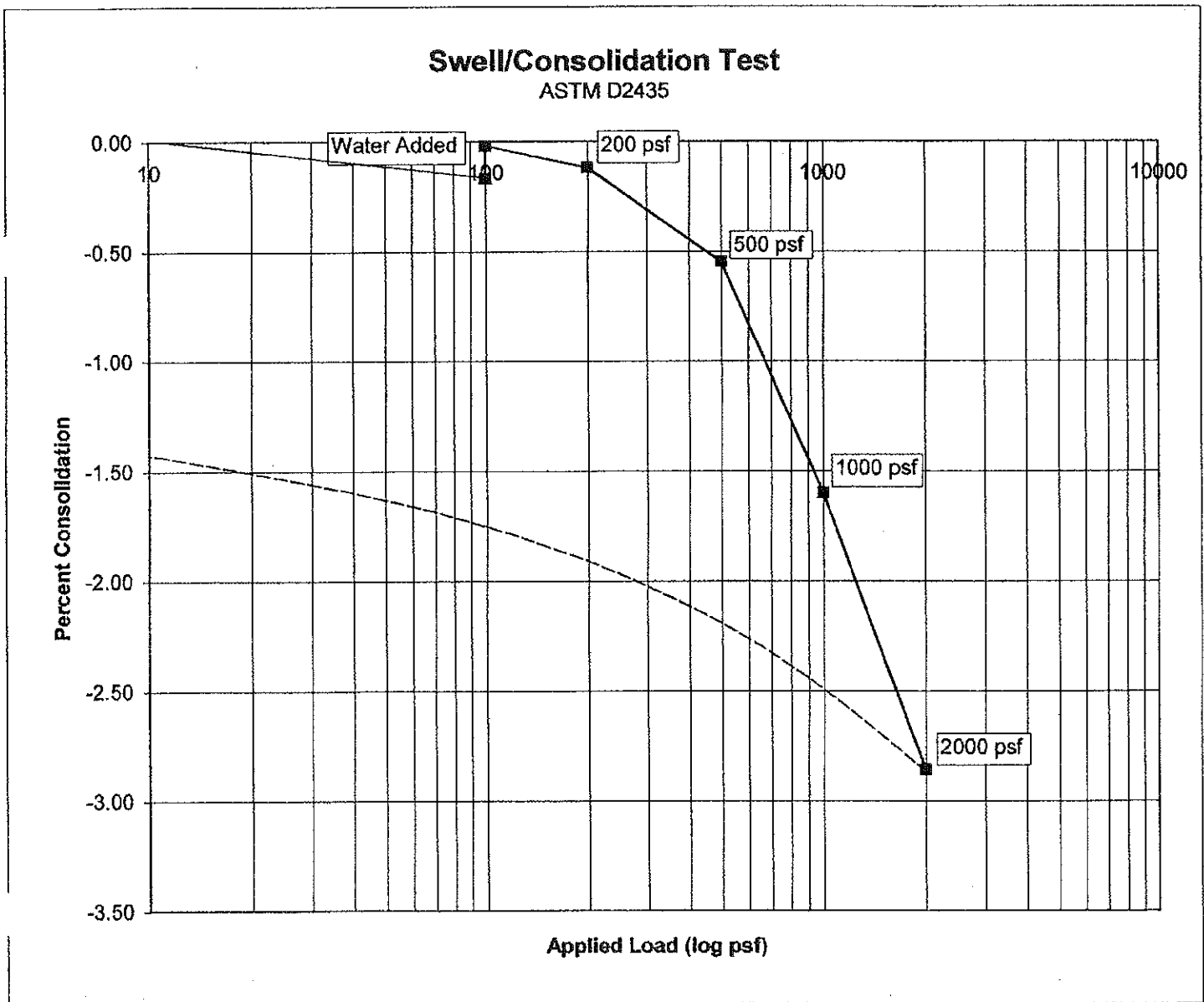
Don Meeks
Lot 150
Telluride Mtn. Village

BUCKHORN GEOTECH

Civil, Structural & Geotechnical Engineers
222 South Park Ave. Montrose, Colorado 81401
870-248-8828 Fax. No. 870-248-0245

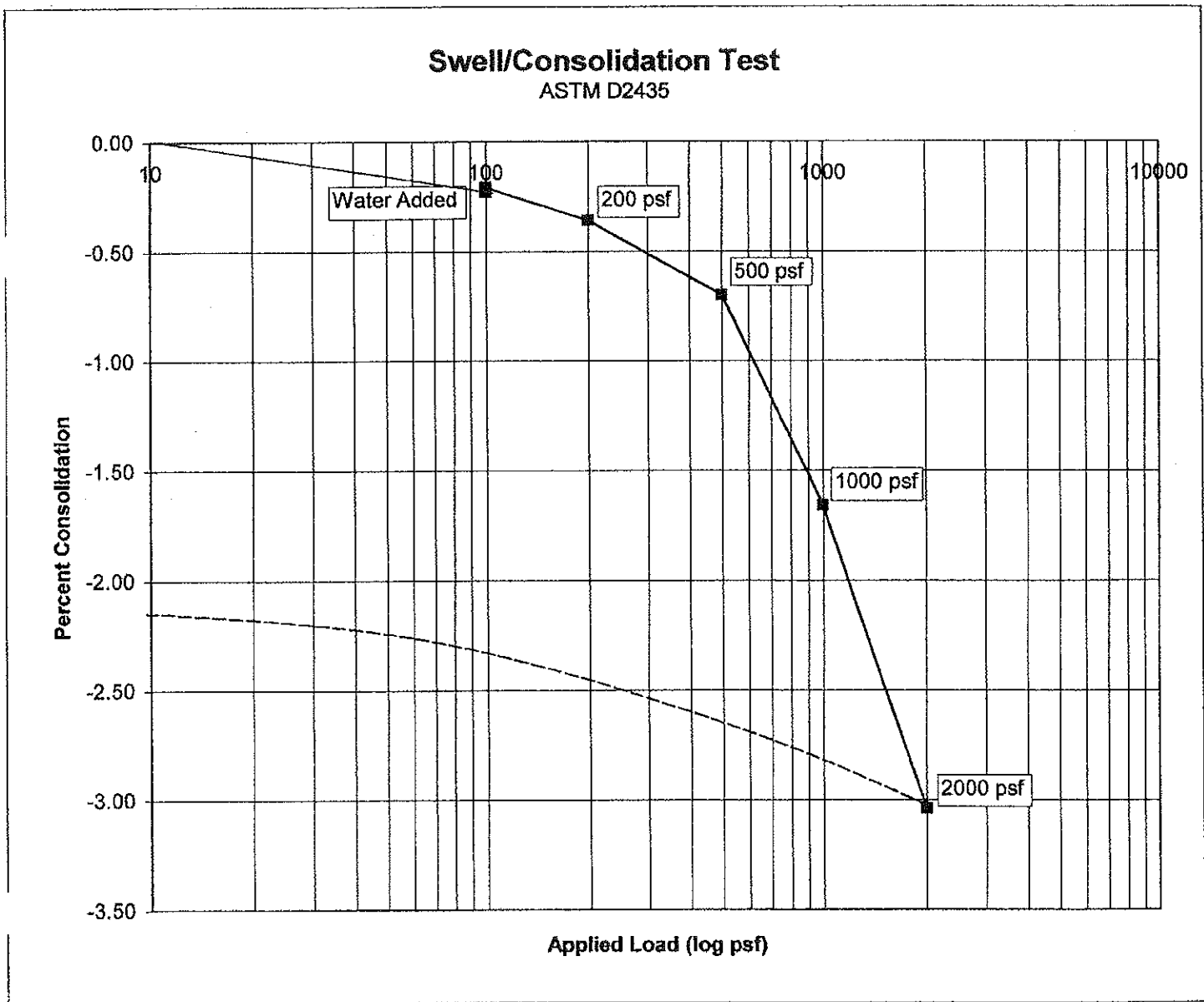
Project:	Meeks	
Location:	Lot 150 Telluride Mtn. Village	
Job #	98154	Date: 5/26/98

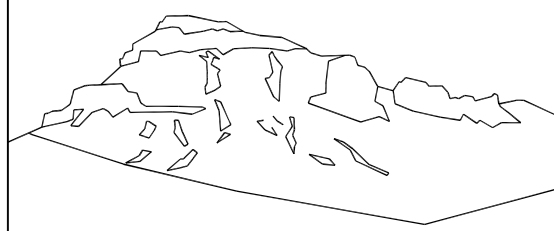
Initial <swell> (Due to water) = 0.15 %
 Percent <Consolidation> (Total movement due to water and 2000 psf Load) = 2.86 %
 Drill Hole No. TP1 @4' Sample No. BV
 Sample Description dark brown clay with red/orange sandstone pieces
 Initial Moisture Content 16.81 % Final Moisture Content 19.80 %
 Initial Density 108.26 lb/cu. ft Final Density 113.53 lb/cu. ft



Project:	Meeks	
Location:	Lot 150 Telluride Mtn. Village	
Job #	98154	Date: 5/26/98

Initial <swell> (Due to water) = 0.02 %
 Percent <Consolidation> (Total movement due to water and 2000 psf Load) = 3.04 %
 Drill Hole No. TP2 @4' Sample No. KP
 Sample Description black, shaley
 Initial Moisture Content 17.74 % Final Moisture Content 21.80 %
 Initial Density 98.60 lb/cu. ft Final Density 104.31 lb/cu. ft





Uncompahgre Engineering, LLC

P.O. Box 3945
Telluride, CO 81435
970-729-0683

SUBMISSIONS:

SUBMITTAL 2018-04-09

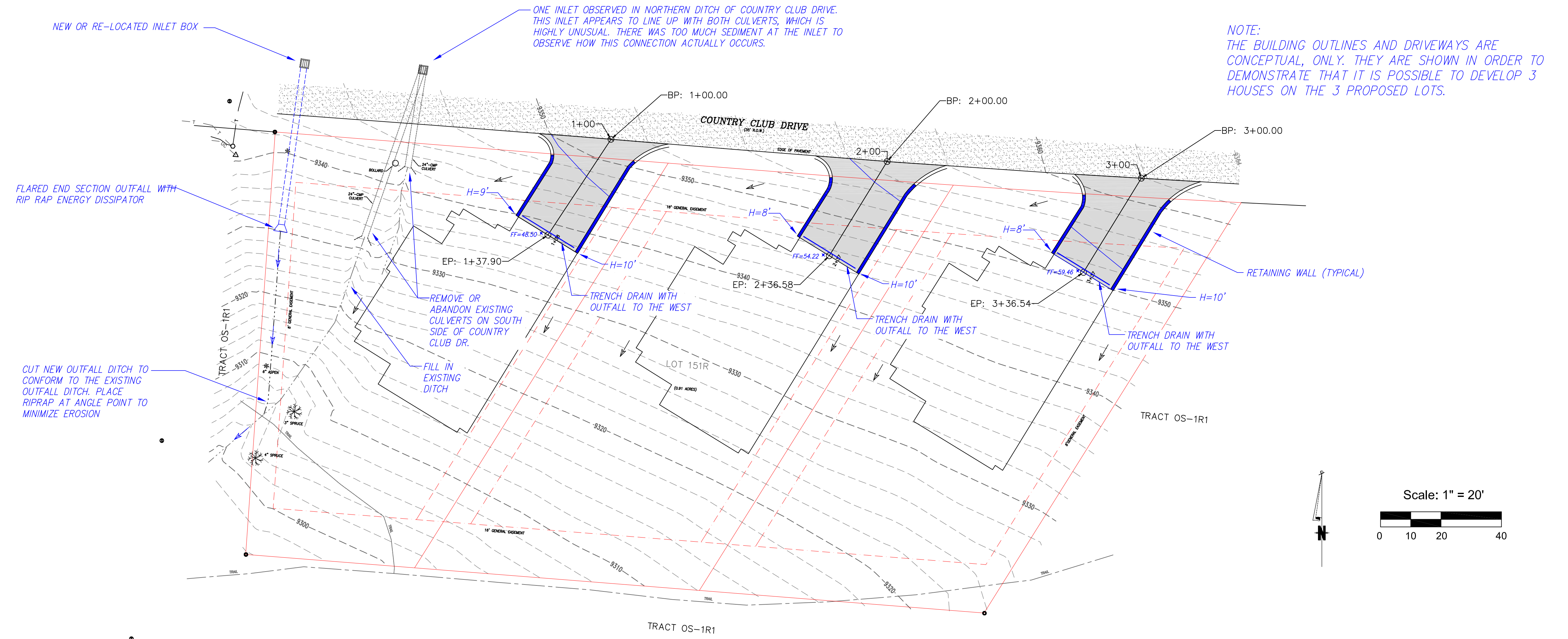
Lot 151R
Country Club Drive
Mtn. Village, CO

NOT FOR CONSTRUCTION

CONTRACTOR TO REVIEW AND COMPARE ALL CHAPTERS AND INTERDISCIPLINARY DRAWINGS AND REPORT ANY DISCREPANCIES TO THE ARCHITECT PRIOR TO ANY FIELD WORK BEING DONE IN ACCORDANCE WITH AIA DOCUMENT A201

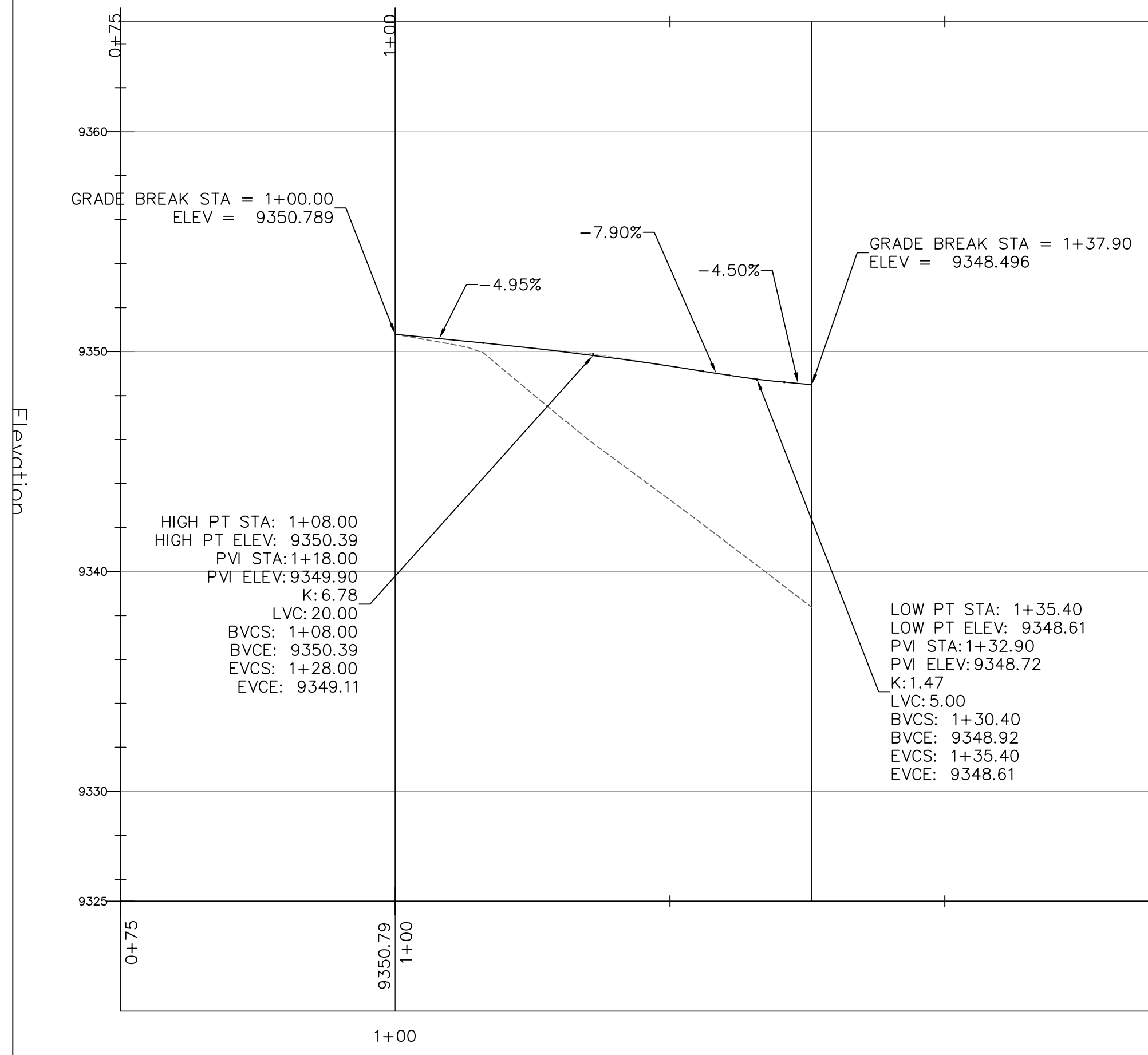
Grading and Drainage Plan
with
Driveway Profiles

C1



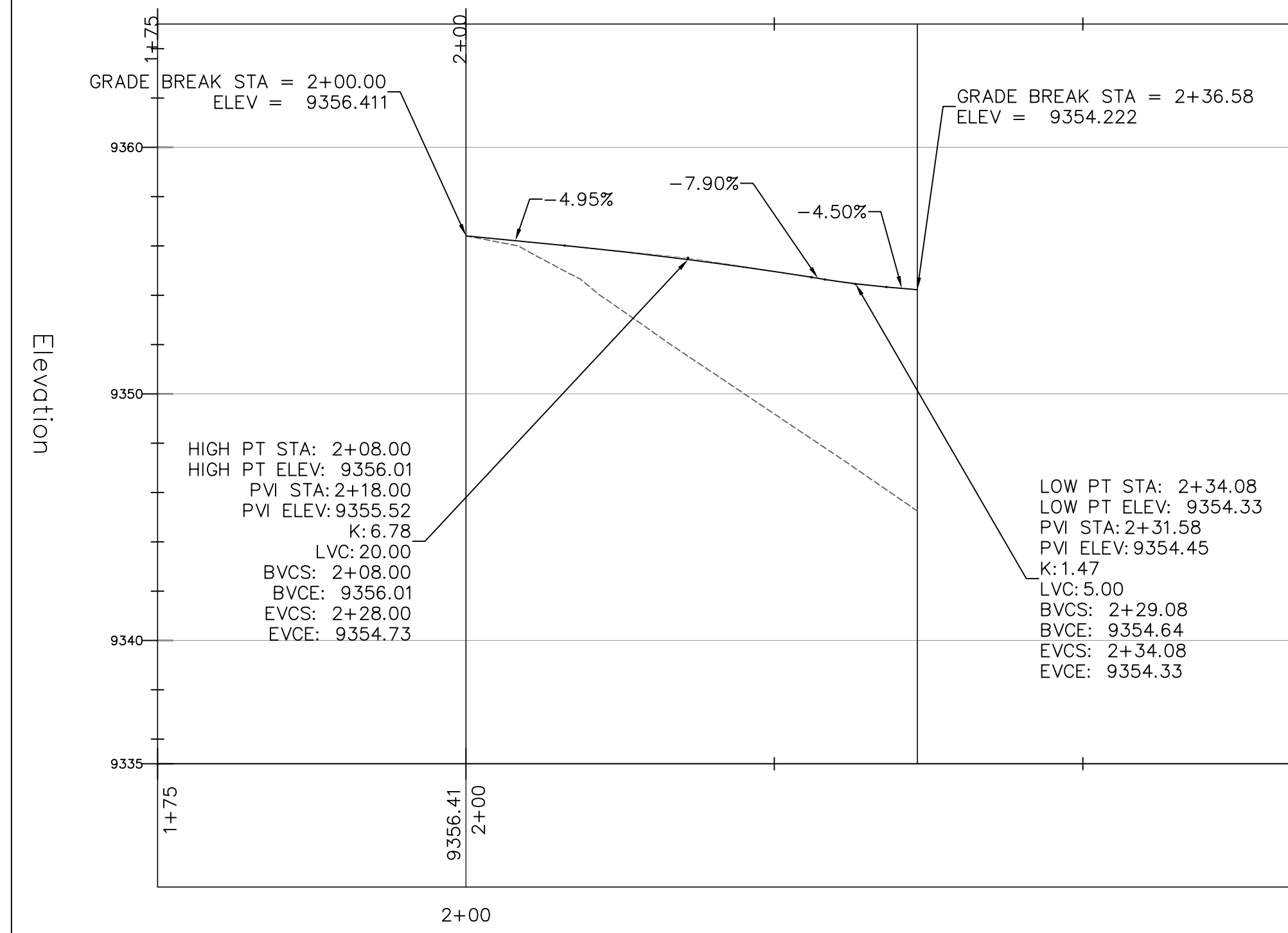
West Driveway Profile

Station



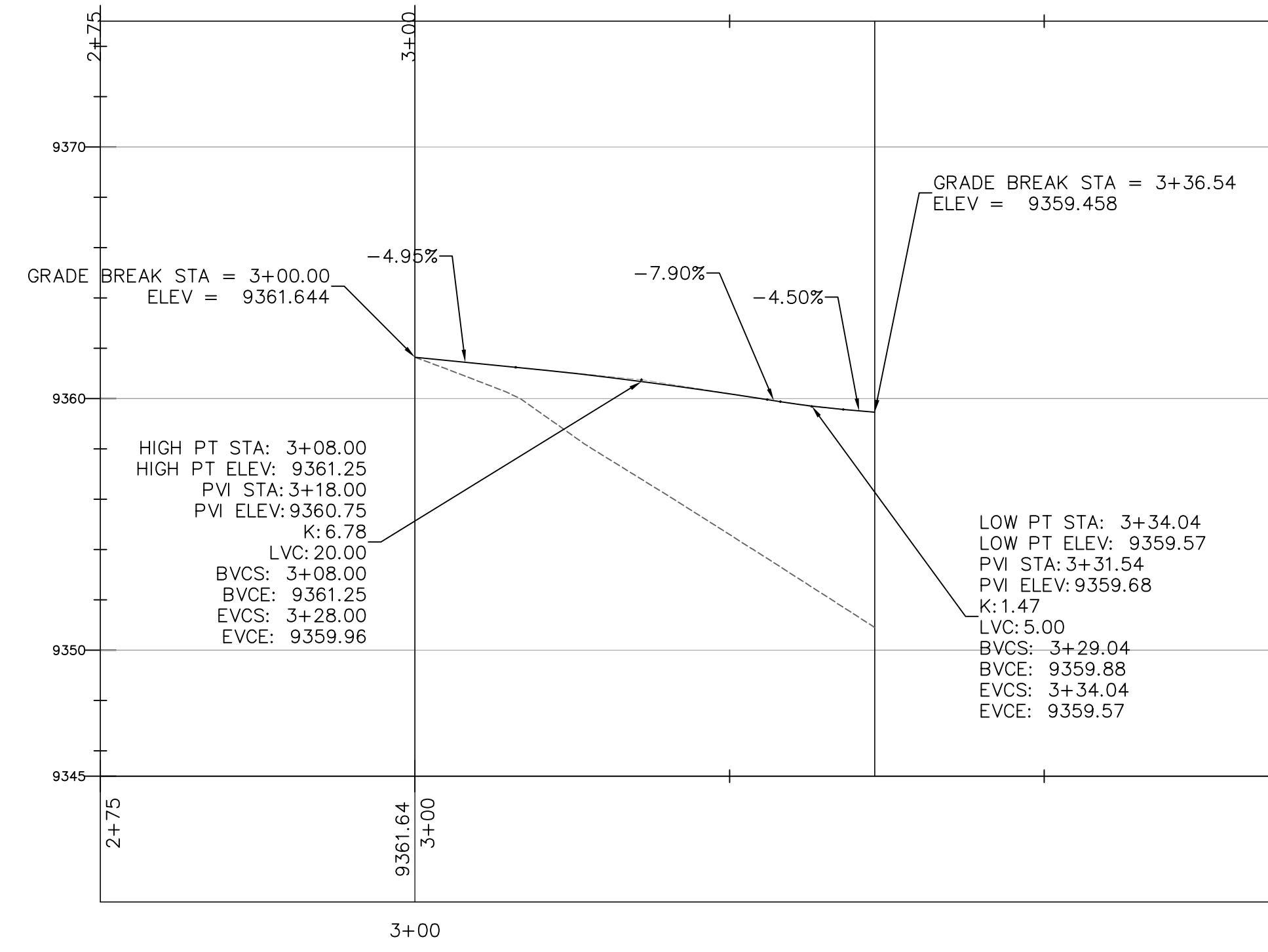
Middle Driveway Profile

Station

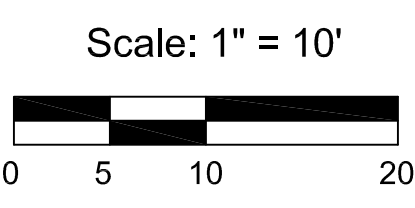


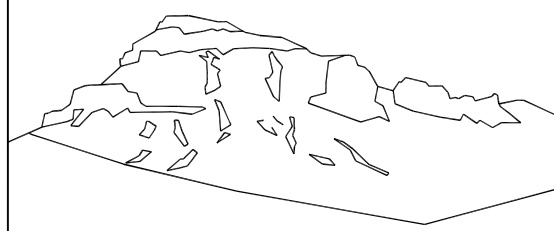
East Driveway Profile

Station



All 3 Profiles are 1"=10' with 2x Vertical Exaggeration





Uncompahgre Engineering, LLC

P.O. Box 3945
Telluride, CO 81435
970-729-0683

SUBMISSIONS:

SUBMITTAL 2018-04-09

Lot 151R
Country Club Drive
Mtn. Village, CO

NOT FOR CONSTRUCTION

CONTRACTOR TO REVIEW AND COMPARE ALL CHAPTERS AND INTERDISCIPLINARY DRAWINGS AND REPORT ANY DISCREPANCIES TO THE ARCHITECT PRIOR TO ANY FIELD WORK BEING DONE IN ACCORDANCE WITH AIA DOCUMENT A201

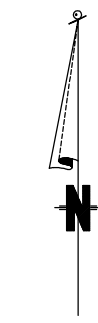
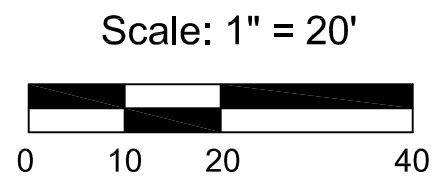
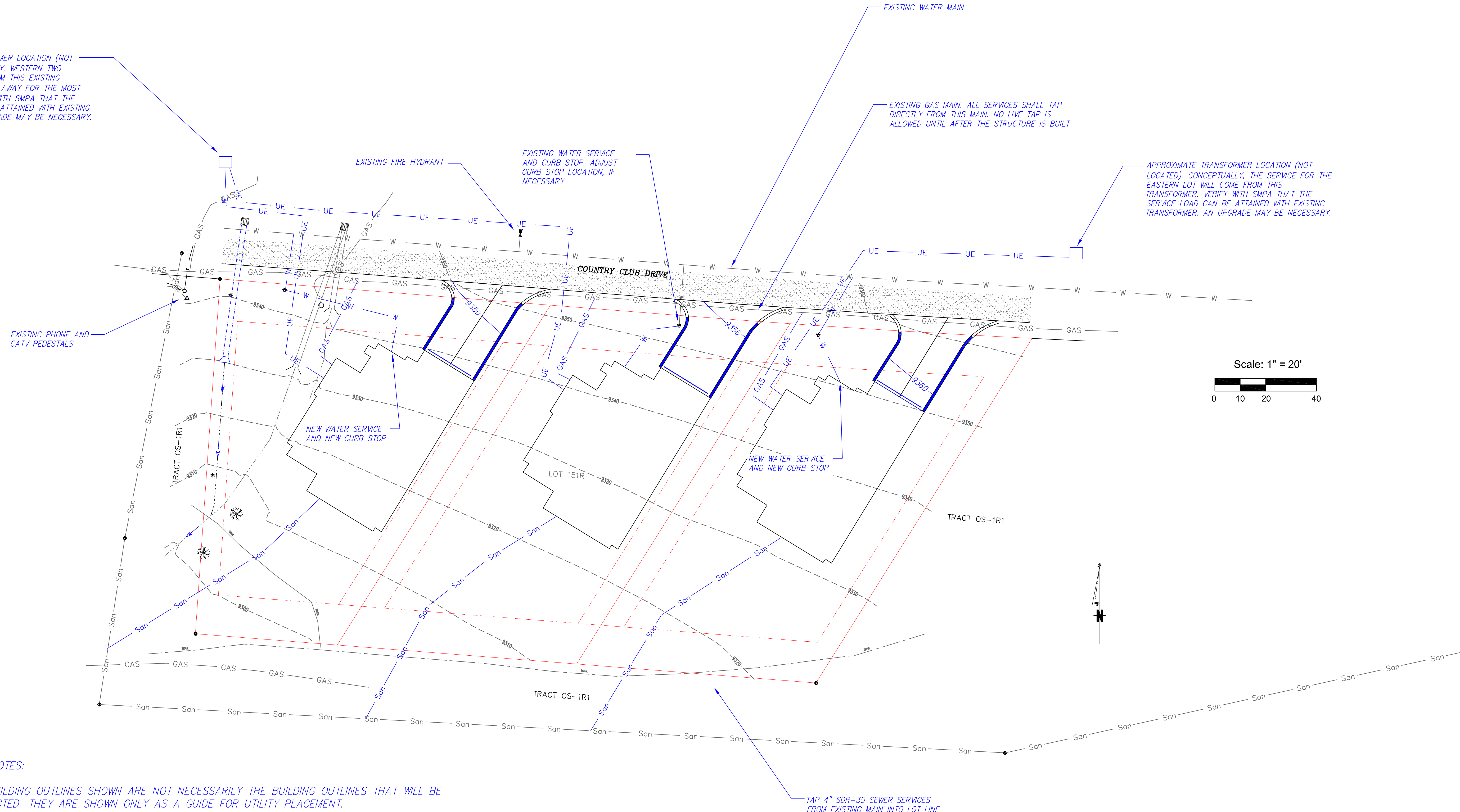
Utility Plan

C2

APPROXIMATE TRANSFORMER LOCATION (NOT LOCATED). CONCEPTUALLY, WESTERN TWO SERVICES WILL FEED FROM THIS EXISTING TRANSFORMER (TOO FAR AWAY FOR THE MOST EASTERN LOT). VERIFY WITH SMPA THAT THE SERVICE LOADS CAN BE ATTAINED WITH EXISTING TRANSFORMER. AN UPGRADE MAY BE NECESSARY.

EXISTING GAS MAIN. ALL SERVICES SHALL TAP DIRECTLY FROM THIS MAIN. NO LIVE TAP IS ALLOWED UNTIL AFTER THE STRUCTURE IS BUILT

APPROXIMATE TRANSFORMER LOCATION (NOT LOCATED). CONCEPTUALLY, THE SERVICE FOR THE EASTERN LOT WILL COME FROM THIS TRANSFORMER. VERIFY WITH SMPA THAT THE SERVICE LOAD CAN BE ATTAINED WITH EXISTING TRANSFORMER. AN UPGRADE MAY BE NECESSARY.



UTILITY NOTES:

1. THE BUILDING OUTLINES SHOWN ARE NOT NECESSARILY THE BUILDING OUTLINES THAT WILL BE CONSTRUCTED. THEY ARE SHOWN ONLY AS A GUIDE FOR UTILITY PLACEMENT.
2. SANITARY SEWER SERVICES AND WATER SERVICES ARE SHOWN TO THE BUILDING OUTLINE ALTHOUGH IT IS EXPECTED THAT THE SERVICES WILL ONLY BE STUBBED INTO THE LOTS AS PART OF THE SUBDIVISION.
3. GAS SERVICES ARE SHOWN, BUT NO LIVE GAS TAPS ARE ALLOWED UNTIL THE METER CAN BE SET ON THE CONSTRUCTED HOUSE. A WILL SERVE LETTER WILL BE OBTAINED FROM BLACK HILLS GAS TO SHOW THAT GAS WILL BE ABLE TO BE PROVIDED TO THE PROPOSED LOTS.
4. UNDERGROUND POWER IS ALSO SHOWN, BUT WILL NEED TO BE FURTHER DEVELOPED DUE TO THE LIMITATIONS WITH THE NUMBER OF 90 DEGREE BENDS IN CONDUIT. A WILL SERVE LETTER WILL BE OBTAINED FROM SMPA TO SHOW THAT POWER WILL BE ABLE TO BE PROVIDED TO THE PROPOSED LOTS.
5. POWER AND PHONE ARE NOT SHOWN AT THIS TIME. THOSE SERVICES ARE NOT CRITICAL, BUT THEY WILL BE FURTHER DEFINED. THE CATV WILL BE COORDINATED WITH TOWN OF MOUNTAIN VILLAGE (THE PROVIDER) AND THE PHONE WILL BE COORDINATED WITH CENTURY LINK.

ANCHOR MARIEMONT LIMITED PARTNERSHIP
128 East 2nd Street
Covington, KY 41011

May 18, 2018

Mountain Village Design Review Board
Mountain Village Town Council
c/o Mr. Sam Starr
Mountain Village Planning & Development Services Dept.
455 Mountain Village Blvd., Suite A
Mountain Village, CO 81435

VIA Email sstarr@mtnvillage.org

Re: Lot 151R, Town of MV Filing No.1

Dear Members of the Design Review Board and Town Council:

Our Limited Partnership owns Lot 143D, one of the single family residences directly across from Lot 151R. While we support the project concept of converting multi-family residences to single family, we want to make sure that the residential character of our portion of Country Club Drive is not ignored, and that the Mountain Village amenity known as Big Billie's Trail is maintained to the manner it was intended when the Open Space was originally platted.

In 2011, the three separate lots were re-platted to one multifamily lot (Lot 151R). As part of that re-plat, a significant Building Setback on the east side of the property was vacated. The Building Setback was created to protect the open space that provides access to the Big Billie's Trail. Upon vacating the Building Setback, the General Easement along the eastern boundary of Lot 151R became the sole remaining buffer between the trail and development on Lot 151R. Additionally, the Open Space lot that provides the access to Big Billie's was further reduced to the east when the "Rosewood" plan was approved (the OS-1R-1 was reconfigured to allow building to be very close to the trail).


Now, as part of the pending Lot 151R application to reestablish three separate lots, the applicant requests that the General Easement of 16' which exists throughout the MV be reduced to 8' on the eastern boundary of Lot 151R. We see this as "creep" of the allowable building envelope towards the Open Space and the trail. There is no valid reason to allow this. We strenuously object to any reduction of the General Easement.

The trail system throughout the Mountain Village is a vital amenity. Any encroachment on the trails in any location would be a disservice to all Mountain Village residents and our many visitors.

Please feel free to contact me if you have any questions.

Sincerely,

ANCHOR MARIEMONT LTD. PARTNERSHIP

By: 
Douglas S. Hynden

Cc: Nicole Pieterse, Esq., via email: nicole.rplaw@gmail.com
Michelle Haynes, Director of Community Development via e-mail: mhaynes@mtnvillage.org

**RESOLUTION OF THE TOWN COUNCIL
OF MOUNTAIN VILLAGE, RESOLUTION APPROVING A MAJOR SUBDIVISION TO
REPLAT LOT 151R INTO LOTS 151A 151B AND 151C**

RESOLUTION NO. 2018

- A. Retreat at Mountain Village LLC, A Limited Liability Company ("Owners") is the owner of record of real rproperties described as Lots 151R, Town of Mountain Village, according to the recorded replat filed 02-16-2011 in Plat Book 1 At Page 4436, County Of San Miguel, State Of Colorado
- B. The Owner has authorized Alpine Planning LLC to pursue the approval of the major subdivision application to replat Lot 151R into Lots 151A 151B and 151C ("Application").
- C. The Owners have addressed, or agreed to address, all conditions of approval of the Application imposed by Town Council.
- D. The Town Council finds that the major subdivision meets the criteria for decision set forth in Section 17.4.13 of the CDC as follows:
 - 1. The lots resulting from the replat are in compliance with Town Zoning and Land Use Regulations and Subdivision Regulations;
 - 2. The proposed subdivision is in general conformance with the goals, policies and provisions of the Comprehensive Plan because the lots and the surrounding area will remain single-family in nature, the densities remain low consistent with single family zoning, and the properties will otherwise look and feel the same;
 - 3. Subdivision access complies with Town standards and codes.
 - 4. Easements are not affected, or have been relocated to the satisfaction of the utility companies and/or the benefited party under the easement or, in the case of vacated easements, the easement is no longer necessary due to changed conditions, and the easement vacation has been consented to by the benefited party under the easement; and
 - 5. The proposed subdivision meets all applicable Town regulations and standards.

NOW, THEREFORE, BE IT RESOLVED THAT THE TOWN COUNCIL HEREBY APPROVES THE MAJOR SUBDIVISION AND AUTHORIZES THE MAYOR TO SIGN THE RESOLUTION SUBJECT TO THE FOLLOWING CONDITIONS:

- 1) The applicant will work with TSG and submit a sewer easement agreement to the town prior to recordation of the new plat.
- 2) Applicant will formalize continued public use of the Big Billie's Trail in its current location on the southwest corner of Lot 151R, as shown on Exhibit D by legal instruction or otherwise agree to have it relocated onto TSG property.
- 3) A Subdivision Improvements Agreement will be executed to the satisfaction of the Town Attorney consistent with 17.4.13.I.4 & 5 Utility Design Standards and Required Utility Improvements.
- 4) The Applicant will submit appropriate fees to staff for recordation with the San Miguel County Assessor's office within six months of approval.

- 5) Staff will review the replat document to verify consistency with CDC Sections 17.4.13.N. Plat Standards, and CDC Section 3. Plat Notes and Certifications, and provide redline comments to the applicant prior to execution of the final mylar.
- 6) The major subdivision approval is conditioned upon final approval of the concurrent rezone to single family zoning and single family density application by Town Council.
- 7) Staff has the authority to provide ministerial and conforming comments on the mylar prior to recordation.

Section 1. Resolution Effect

- A. This Resolution shall have no effect on pending litigation, if any, and shall not operate as an abatement of any action or proceeding now pending under or by virtue of the resolutions repealed or amended as herein provided and the same shall be construed and concluded under such prior resolutions.
- B. All resolutions, of the Town, or parts thereof, inconsistent or in conflict with this Resolution, are hereby repealed, replaced and superseded to the extent only of such inconsistency or conflict.

Section 2. Severability

The provisions of this Resolution are severable and the invalidity of any section, phrase, clause or portion of this Resolution as determined by a court of competent jurisdiction shall not affect the validity or effectiveness of the remainder of this Resolution.

Section 3. Effective Date

This Resolution shall become effective on August 18, 2016 (the “Effective Date”) as herein referenced throughout this Resolution.

Section 4. Public Meeting

A public meeting on this Resolution was held on the 14th day of June 2018 in the Town Council Chambers, Town Hall, 455 Mountain Village Blvd, Mountain Village, Colorado 81435.

Approved by the Town Council at a public meeting held on June 14, 2018.

Town of Mountain Village, Town Council

By: _____
Laila Benitez, Mayor

Attest:

By: _____
Jackie Kennefick, Town Clerk

Approved as to Form:

James Mahoney, Assistant Town Attorney



**PLANNING AND DEVELOPMENT SERVICES
DEPARTMENT**
455 Mountain Village Blvd.
Mountain Village, CO 81435
(970) 369-8250

Agenda Item No. 10

TO: Town Council
FROM: Sam Starr, Planner
FOR: Meeting of June 14, 2018
DATE: June 6, 2018
RE: First Reading, Setting of A Public Hearing and Council Vote on an Ordinance Approving (1) a Rezone of Lot 151R from Multi-Family to Single Family (2) Changing Four Condominium Unit Designations to Three Single Family Unit Designations to be Assigned to Each Replatted Lot (Lot 151A, Lot 151B, and Lot 151C) Per Community Development Code Sections 17.4.9 & 17.4.10.

PROJECT GEOGRAPHY

Legal Description: Lot 151R, Town of Mountain Village according to Plat Book 1, Page 4436 according to records of San Miguel County, Colorado.

Address: 239 Country Club Drive

Applicant/Agent: Alpine Planning LLC

Owner: The Retreat at Mountain Village III, LLC

Zoning: Multi Family

Existing Use: Vacant land

Proposed Use: Rezone and replat into three single family lots on Lot 151R

Lot Size: .909 acres

Adjacent Land Uses:

- **North:** Single Family
- **South:** Open Space
- **East:** Multi Family
- **West:** Multi Family

ATTACHMENTS

- Exhibit A: Applicant's Narrative
- Exhibit B: Ordinance

BACKGROUND

The owners of Lot 151R, 239 Country Club Drive have applied to replat the property into three (3) single family lots. In addition to the Major subdivision application the applicant submitted a rezoning and density transfer application, to rezone the property from multi-family zoning to single family zoning and change the zoning designation from four condominium units to three single family units having a resulting equal person equivalent density. Both applications have been received and are being reviewed concurrently. The minor subdivision application will be reviewed with the rezone and density transfer application by Town Council on June 14th, 2018.

CRITERIA AND ANALYSIS

The criteria for decision for the board to evaluate a rezone from the Multi-Family Zone District to Single-Family Zone District is listed below. The following criteria must be met for the review authority to approve a rezoning application:

- a. The proposed rezoning is in general conformance with the goals, policies and provisions of the Comprehensive Plan;
- b. The proposed rezoning is consistent with the Zoning and Land Use Regulations;
- c. The proposed rezoning meets the Comprehensive Plan project standards;
- d. The proposed rezoning is consistent with public health, safety and welfare, as well as efficiency and economy in the use of land and its resources;
- e. The proposed rezoning is justified because there is an error in the current zoning, there have been changes in conditions in the vicinity or there are specific policies in the Comprehensive Plan that contemplate the rezoning;
- f. Adequate public facilities and services are available to serve the intended land uses;
- g. The proposed rezoning shall not create vehicular or pedestrian circulation hazards or cause parking, trash or service delivery congestion; and
- h. The proposed rezoning meets all applicable Town regulations and standards.

The proposed rezone the property from Multi-Family to Single Family and change of unit designation from condominium to single family is consistent with the Comprehensive Plan which notes in Land Use Value Number 8, land uses are envisioned to fit into the surrounding neighborhood. (p. 35 of the Comprehensive Plan). The existing zoning and density of single family homes from 230 to 266 Country Club Drive demonstrate that this density transfer and rezone would be appropriate for the neighborhood character. Items F and G will be addressed in the Major Subdivision Application.

PROPOSED MOTION

I move to approve on first reading and set a public hearing for the July Town Council meeting, the rezone and density transfer application pursuant to CDC Sections 17.4.9 & 17.4.10 to rezone the property from the Multi-Family zone district to the Single-Family zone district and change the Zoning Designations from four condominium units to three single family units (one per each proposed new lot) with the resulting 12 person equivalent for the project with the findings found in the staff memo and the following conditions:

1. The approval is conditioned upon the Major subdivision plat approval by the Town Council.

/STS

Lot 151R Rezoning and Subdivision



BACKGROUND

The Retreat at Mountain Village III (“**Owner**”) desires to rezone Lot 151R (“**Property**”) from the Multi-family Zone District to the Single-family Zone District and to replat the Property to create three single-family lots as shown in Exhibit A.

The Property is located at 239 Country Club Drive as shown in Figure 1. The Property is located to the north of the Hole 1 Fairway, with the Big Billies Trail located along the property line and in a portion of the southern general easement.

The Property has a low USGS elevation of 9296 and a high elevation of 9362 with an overall elevation gain of 66 feet with slopes that are generally less than 30%. There are some slopes that are 30% or greater that are located in the westerly half of the Property as shown on the slope map in Exhibit B.

The Property has the following designated land uses:

Lot	Acreage	Zone District	Zoning Designation	Actual Units	Density Per Unit	Equivalent Units
151R	0.91	Multi-Family	Condo	4	3	12

The proposed land uses for the Property follows:

Lot	Acreage	Zone District	Zoning Designation	Actual Units	Density Per Unit	Equivalent Units
151R	0.91	Single-family	Single-family	3	4	12

There is no need to transfer density to or from the Property.

The Property was first platted in 1984 under the Mountain Village Filing No. 1 Plat at Reception Number 233115, with the designated use of a Condominium Lot with three condominium units. The Property was re-platted in 1987 to create three lots that allowed one detached single-family condominium on each lot. The Town approved a replat of the Property in 2011 that vacated the lot lines to create Lot 151R that is the current plat for the Property (Exhibit C).

REZONING

Rezoning Criteria for Decision

The proposed rezoning meets the Rezoning criteria for decision set forth in Community Development Code (“**CDC**”) Section 17.4.9(C) as set forth in the following sections.

General Conformance with the Comprehensive Plan

The Mountain Village Comprehensive Plan (“**Comprehensive Plan**”) Future Land Use Plan envisions the Property rezoned to the Single-family Zone District as shown in Figure 2. The Multi-family Zone District currently permits detached condominiums that are built as single-family dwellings. Detached condominiums are viewed as single-family development. So both the current zoning and the Comprehensive Plan contemplate the single-family land uses for the Property. There are no wetlands, trees or forests located on the Property. Steep slopes are addressed latter in this narrative.

Figure 1. Vicinity Map

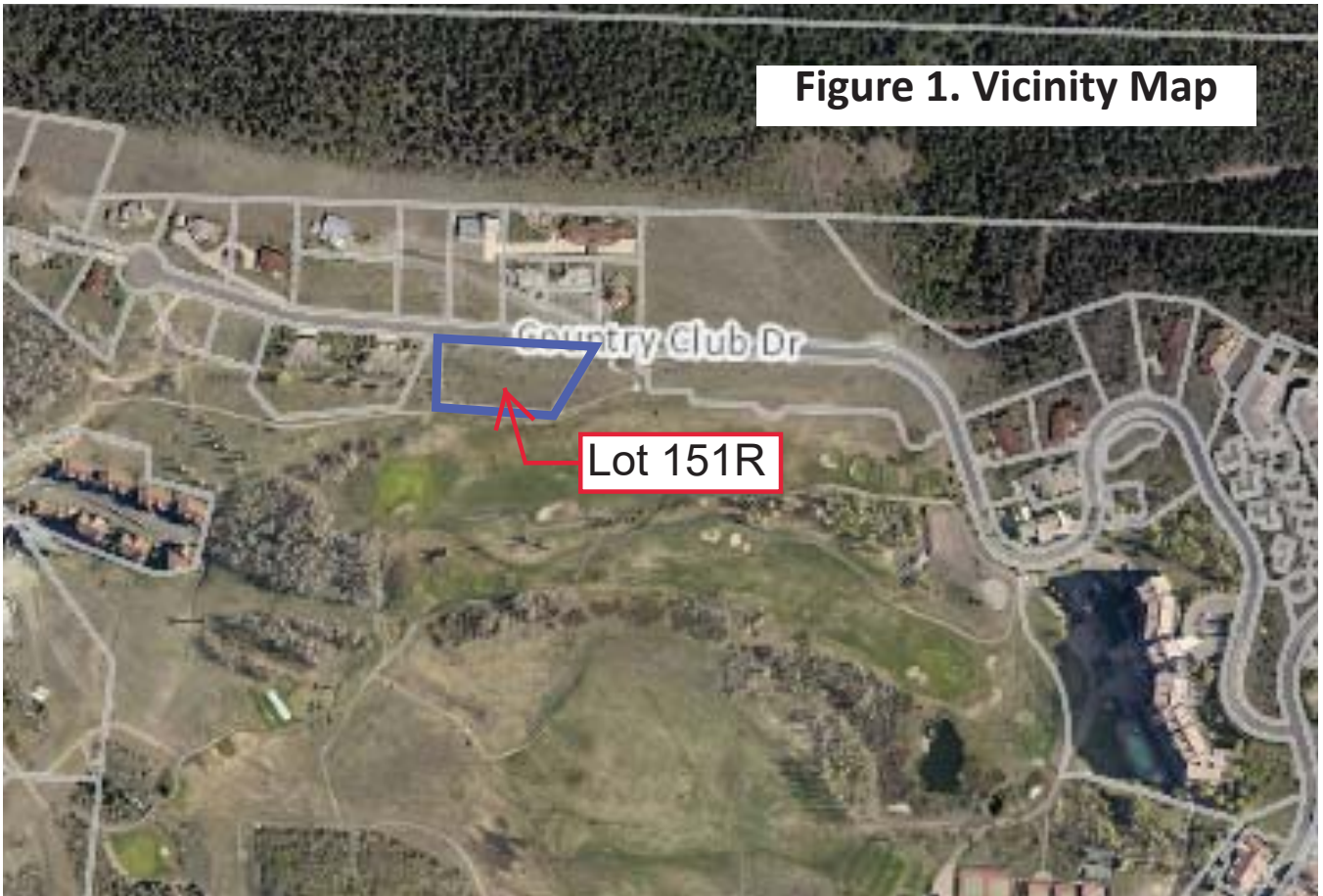
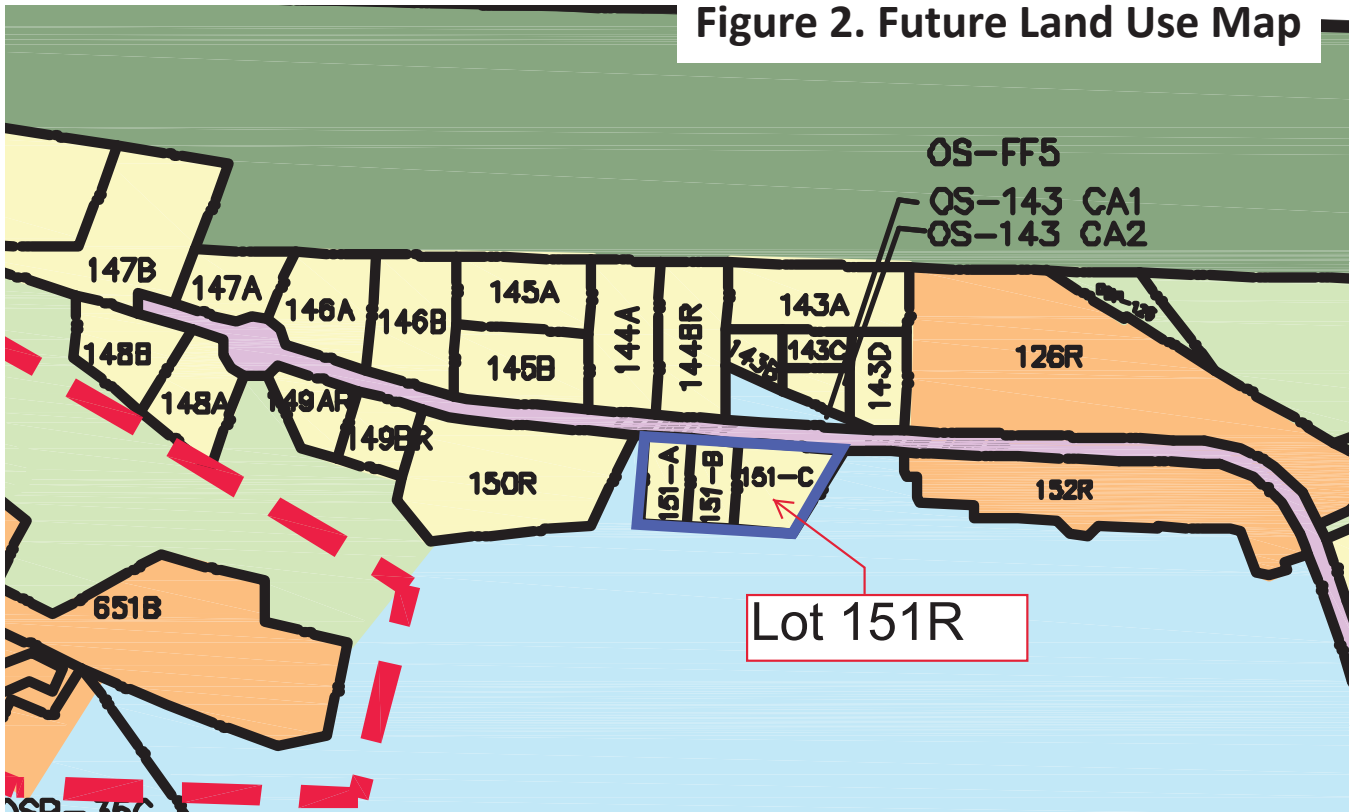


Figure 2. Future Land Use Map



Consistency with the Zoning and Land Use Regulations

The proposed rezoning and subdivision are consistent with the Zoning and Land Use Regulations contained in CDC Section 17.3. Single-family dwellings are permitted uses in the Single-family Zone District. The existing person equivalent density allows for the conversion of four condominium units to three single-family dwellings with no need to transfer density to or from the Property. The rezoning and subdivision do not impact platted open space. Building height and lot coverage will be in compliance with the CDC limitations. The owner is proposing to establish 16 foot general easements in between the proposed building envelopes with eight (8) feet on either side of the interior lot lines and to vacate the general easement on the east and west sides of the Property as discussed below.

General Easement Vacation

The Owner is seeking to vacate the eastern and western general easements from 16 feet to 8 feet as shown in Exhibit A. The main purposes of the general easement are to provide buffering to surrounding land uses and to maintain the ability to conduct any of the general easement allowed uses. The west and east sides of the Property abut TSG open space which provides ample buffering to surrounding land uses, with 64 feet to the development to the west, and over 127 feet to the Northlight property to the east. The Big Billies Trail will be provided a 16 foot general easement setback as it runs along the southerly Property boundary. The Owner has agreed to a plat note that requires landscape buffering in the western and eastern general easements of Lot 1 and Lot 3, respectively, to soften the development as viewed from surrounding development.

The general easement definition allows for the following uses, improvements and activities:

“...utilities, drainage, electrical service, communication service, ski slope maintenance, bicycle

access, skier access, roadway access, equestrian access, pedestrian access, golf cart access, snow making, waterways, slope maintenance, snow storage, retaining walls, snowmobile access, snow removal, snowcat access, water, sanitary sewer and storm sewer.”

These general easement uses and activities are not needed for the Property because all utilities have been established in the area and the surrounding open space allows for ski-related uses. We therefore believe that the eastern and western general easements may be reduced and vacated from 16’ to 8’ as shown on the proposed plat.

The Town has historically allowed for the vacation and reduction of the general easement to allow for desired development plans, with the most applicable example at Trails Edge Subdivision where the general easement was vacated where it adjoined open space to the north. Even Lot 151R had portions of the general easement vacated as shown in Exhibit E. We are similarly requesting the Town consider vacating the general easement as shown, with the general easement section of the CDC recognizing general easement vacations.

Comprehensive Plan Project Standards

The proposed rezoning will meet the Comprehensive Plan Project Standards because visual impacts will be minimized. The current and proposed zoning allowing a building height of 30 feet plus 5 feet for gabled roofs and for detached condominiums without size limitations pursuant to the Multi-family Zone District standards, subject to a 65% lot coverage. The Single-family Zone District limits lot coverage to 40%, so there is also a 20% reduction in allowed lot coverage with the rezoning. The single-family dwellings will have less scale and mass that is designed in accordance with the Zoning and Land Use Regulations and the Design Regulations. Environmental and geotechnical impacts will be minimized and mitigated consistent with the Comprehensive Plan and the CDC. Site specific issues will be addressed concurrent with the Design Review Process.

Rezoning Justification

The rezoning is justified because it is envisioned by the Future Land Use Map as shown in Figure 2.

Public Facilities and Services

The site survey in Exhibit D shows that water, natural gas and telecommunications are available in the Country Club Drive Right-of-Way. Electricity will have to be provided from the north of County Club Drive. Sewer is available in the TSG open space to the south. Fire protection is provided by the Telluride Fire Protection District. Police protection, street maintenance and general government services are available from the Town.

Circulation, Parking, Trash and Deliveries

The Property has access from Country Club Drive, with trash pickup and deliveries easily and safely accessible. Parking will be provided on each site in accordance with the Design Regulations.

SUBDIVISION

Criteria for Decision

The proposed development is classified as a Major Subdivision. The proposed subdivision complies with the Subdivision criteria for decision set forth in CDC Section 17.4.13(E)(1) as outlined in the following sections.

General Conformance with the Comprehensive Plan

The proposed subdivision generally conforms to the Comprehensive Plan as outlined under the rezoning section above.

Consistency with the Zoning and Land Use Regulations

The proposed subdivision is consistent with the Zoning and Land Use Regulations as set forth under the rezoning section above.

Density Allocation

The concurrent rezoning request is proposing to convert the four actual units and 12 person equivalent units of condominium density to 12 person equivalents of single-family density for the three (3) proposed lots.

Consistency with Subdivision Regulations

The proposed subdivision is consistent with the Subdivision Regulations as set forth below.

Adequate Public Facilities and Services

The site survey in Exhibit D shows that water, natural gas and telecommunications are available in the Country Club Drive Right-of-Way. Electricity will have to be provided from the north of County Club Drive. Sewer is available in the TSG open space to the south, with a draft easement to cross TSG land in process. Fire protection is provided by the Telluride Fire Protection District. Police protection, street maintenance and general government services are available from the Town. A draft civil plan for utilities is shown in Exhibit F.

Soil and Geologic Conditions

The approval of the Mountain Village Filing No. 1 plat and the original County PUD found that the development of the area avoids areas subject to geological hazards. A geotechnical report may be required by the Town Building Department as a part of the building permit process for each lot to ensure homes are designed in accordance with soil conditions that are present on the Property. A geotechnical report for the Property to the west, Lot 150, is shown in Exhibit E.

Subdivision Access

Each lot will be accessed from Country Club Drive and will be designed to meet the Driveway Standards contained in CDC Section 17.6.6(B) unless a variation is granted by the Design Review Board during the Design Review Process as allowed by Subsection 23. The draft access and grading plan is shown in Exhibit F.

Subdivision Design Standards and General Standards

The proposed subdivision complies with the Subdivision Design and General Standards set forth in CDC Section 17.4.13(F) as set forth in the following sections.

Minimum Frontage. Each lot has over 50 feet of frontage.

Vehicular and Utility Access. Vehicular and utility access is provided off of Country Club Road with the exception of sewer. The site survey shows the sewer line is located on TSG open space so we are working with TSG to create a new sewer line easement for the subdivision. This easement will be submit-

ted for Town review and approval in the near future.

Minimum Lot Size. The proposed lot sizes are envisioned by the Comprehensive Plan as shown in Figure 2. In addition, the proposed lot sizes are approximately 0.3 acres which is very similar to the lots to the north (Lots 143B, 143C and 143D) that have an average size of 0.22 acre.

Solar Access. Each lot will have great solar access to the south.

General Easement. A 16 foot general easement is provided on the north and south lot lines. The Owner is proposing to vacate the 16 foot western and eastern general easement and provide an 8 foot setback/general easement as outlined in the zoning discussion above. The general easements and setbacks as proposed will provide for adequate buffering and general easement uses. A 16 foot general easement is provided in between each building envelope in the subdivision, with 8 feet on either side of the lot line.

Design of Lots. The lots have been designed in accordance with the development pattern envisioned in the Comprehensive Plan; topographical considerations; convenient and safe access; provision of adequate building area that meets the zoning and subdivision requirements; utilities and views to the southwest.

Protection of Natural Features. There are no natural features on the site.

Topography of the Land. The subdivision has been designed to fit the topography of the land to the extent practical.

Areas Subject to Environmental Hazard. There are no environmental hazard areas in the Property.

Drainage. The Property survey shows two culverts in the northwest corner that are planned to be replaced with a new culvert as shown on the drainage plan in Exhibit F. Drainage from the proposed culvert is located in the proposed 8' general easement. The development of each lot will have to provide for the required drainage improvements as a part of the required Design Review Process.

Fire Protection. Fire protection is provided by the Telluride Fire Protection District. Hydrants have been installed along Country Club Drive as required by the original subdivision development of the area.

Street Improvements. Country Club Drive street improvements have already been installed. Each home will have to provide a new driveway onto Country Club Drive concurrent with development.

Water, Sewer and Utilities. Water, gas, telecommunications and electric utilities are available from Country Club Drive. The sewer line intended to serve Lot 151R and other lots to the west is located in TSG open space as discussed above.

Utility Design and Improvements. The Owner's team will need to work with the Town and utility agencies to create an overall utility plan with any needed subdivider improvements listed on a subdivision improvements agreement.

Required Dedications. There are no required land dedications for the subdivision. Big Billies Trail is located in the 16 foot general easement on proposed Lot 151R-3.

Maintenance of Common Areas. There are no common areas associated with the proposed subdivision.

Public Improvement Policy. The subdivision improvements agreement will be provided to the Town

after a utility plan is reviewed and approved by the utility agencies and the Town.

Steep Slope Regulations

The proposed subdivision has some area with slopes that are 30 percent or greater. CDC Section 17.6.1(C)(2)(a) states:

“Building and development shall be located off slopes that are thirty percent (30%) or greater to the extent practical.

i. In evaluating practicable alternatives, the Town recognizes that it may be necessary to permit disturbance of slopes that are 30% or greater on a lot to allow access to key viewsheds, avoid other environmental issues, buffer development and similar site-specific design considerations.”

Most of the lots on the south side of Country Club Drive contain steep slopes with the lots platted and density assigned to the site knowing such conditions existed. Disturbance to steep slopes is needed to allow for development envisioned by the Comprehensive Plan, access to key views and to allow for reasonable use of the Property. The Town has always envisioned the development of Lot 151 including the steep slopes areas given its size and the density permitted.

The intent of the Steep Slope Regulations is to protect water quality, visual resources and slope stability. In this case, there will be no adverse impacts to water quality, visual resources or slope stability due to the need to provide engineered plans, application of water quality protection measures, and height being limited due to the slopes dropping from Country Club Drive.

CDC 17.6.1(C)(2)(c) states:

The review authority shall only allow for disturbance to slopes thirty percent (30%) or greater if it is demonstrated that there is not a practicable alternative to avoiding such activities and if the following criteria are met:

- i. The proposed steep slope disturbance is in general conformance with the Comprehensive Plan;
- ii. The proposed disturbance is minimized to the extent practical;
- iii. A Colorado professional engineer or geologist has provided:
 - (a) A soils report or, for a subdivision, a geologic report; or
 - (b) An engineered civil plan for the lot, including grading and drainage plans.
- iv. And the proposal provides mitigation for the steep slope development in accordance with the engineered plans.

The Comprehensive Plan envisions the development of three single-family lots as proposed by the Owner. The general easement and setback areas for each lot will minimize steep slopes associated with the fill for Country Club Drive. A soils report for Lot 150R to the west has been provided to show the general soils conditions for the area. Each lot will be required to submit a geotechnical report with the building permit applications to show that each home has been designed to meet site specific soils conditions. A Colorado Professional Engineer has prepared the conceptual grading plans for the drive-ways and the drainage as shown in Exhibit F, with each lot also required to have a Colorado PE prepare the drainage and grading plans.

ORDINANCE NO. 2018-__

ORDINANCE OF THE TOWN COUNCIL OF THE TOWN OF MOUNTAIN VILLAGE, COLORADO APPROVING: (1) REZONE LOT 151R FROM MULTI-FAMILY TO SINGLE FAMILY (2) CHANGING FOUR CONDOMINIUM UNIT DESIGNATIONS TO THREE SINGLE FAMILY UNIT DESIGNATIONS TO BE ASSIGNED TO EACH REPLATTED LOT (LOT 151A, LOT 151B AND LOT 151C)

RECITALS

- A. The applicant and owner’s representative, Alpine Planning, LLC., has submitted an application for a rezoning and density transfer for the replat of Lots 151R into Lots 151A 151B and 151C. The owner proposed to rezone the property from multi-family to single family and change four condominium unit designations to three single family unit designation to be assigned one single family unit designation per each replatted lot pursuant to the requirements of the Community Development Code (“**CDC**”).
- B. Retreat at Mountain Village III, LLC. is the owner of Lot 151R.
- C. Replatted 151R results in Lot 151A, 151B and 151C (collectively the “**Property**”) and have the following physical addresses in respective order: 239 Country Club, 241 Country Club and 243 Country Club Drive.
- D. The Owner has authorized the Alpine Planning LLC. to pursue the approval of the major subdivision application to replat Lot 151R into Lots 151A 151B and 151C (the “Subdivision Application”). Concurrent with the Subdivision Application a rezoning and density transfer application to rezone the property from multi-family to single family and change the unit configuration from condominium unit designation to single family unit designation has been filed (the “Rezoning Application”).
- E. The Property has the following zoning designations pursuant to the Official Land Use and Density Allocation List and zoning as set forth on the Town Official Zoning Map:

Lot No.	Zone District	Zoning Designation	Actual Units	Person Equivalent per Actual Unit	Total Person Equivalent Density
Lot 151R	Multi Family	Condominium	4	3	12

- F. At a duly noticed public hearing held on June 7, 2018, the DRB considered the Applications, testimony and public comment and recommended to the Town Council that the Applications be approved with conditions pursuant to the requirement of the CDC.
- G. At its regularly scheduled meeting held on June 14, the Town Council conducted a public hearing on this Ordinance, pursuant to the Town Charter and after receiving testimony and public comment, closed the hearing and approved the Applications and this Ordinance on second reading.

H. This Ordinance rezones the Property as follows

Lot No.	Zone District	Zoning Designation	Actual Units	Person Equivalent per Actual Unit	Total Person Equivalent Density	Notes
Lot 151A	Single Family	Single Family	1	4	4	
Lot 151B	Single Family	Single Family	1	4	4	
Lot 151C	Single Family	Single Family	1	4	4	

I. The meeting held on June 14 was duly publicly noticed as required by the CDC Public Hearing Noticing Requirements, including but not limited to notification of all property owners within 400 feet of the Property, posting of a sign and posting on the respective agendas.

J. The Town Council hereby finds and determines that the Applications meet the Rezoning Process Criteria for Decision as provided in CDC Section 17.4.9(D) as follows:

Rezoning Findings

1. The proposed rezoning is in general conformance with the goals, policies and provisions of the Comprehensive Plan.
2. The proposed rezoning is consistent with the Zoning and Land Use Regulations.
3. The proposed rezoning meets the Comprehensive Plan.
4. The proposed rezoning is consistent with public health, safety and welfare, as well as efficiency and economy in the use of land and its resources.
5. The proposed rezoning is justified because of the specific policies in the Comprehensive Plan that contemplate the rezoning as applied for.
6. Adequate public facilities and services are available to serve the intended land uses.
7. The proposed rezoning shall not create vehicular or pedestrian circulation hazards or cause parking, trash or service delivery congestion.
8. The proposed rezoning meets all applicable Town regulations and standards.

K. The Town Council finds that the Applications meet the Rezoning Density Transfer Process criteria for decision contained in CDC Section 17.4.10(D)(2) as follows:

NOW, THEREFORE, BE IT RESOLVED THAT THE TOWN COUNCIL HEREBY APPROVES THE APPLICATION SUBJECT TO THE FOLLOWING CONDITIONS.

- 1) The approval is conditioned upon the Major subdivision plat approval by the Town Council.

Section 1. Effect on Zoning Designations

A. This Resolution changes the zoning from Single Family to Multi-Family on the Properties.

B. This Resolution changes the unit designation from Condominium to Single Family.

Section 2. Ordinance Effect

All ordinances, of the Town, or parts thereof, inconsistent or in conflict with this Ordinance, are hereby repealed, replaced and superseded to the extent only of such inconsistency or conflict.

Section 3. Severability

The provisions of this Ordinance are severable and the invalidity of any section, phrase, clause or portion of this Ordinance as determined by a court of competent jurisdiction shall not affect the validity or effectiveness of the remainder of this Ordinance.

Section 4. Effective Date

This Ordinance shall become effective on _____, 2018 following public hearing and approval by Council on second reading.

Section 5. Public Hearing

A public hearing on this Ordinance was held on the 19th of July, 2018 in the Town Council Chambers, Town Hall, 455 Mountain Village Blvd, Mountain Village, Colorado 81435.

INTRODUCED, READ AND REFERRED to public hearing before the Town Council of the Town of Mountain Village, Colorado on the 14th day of June, 2018.

TOWN OF MOUNTAIN VILLAGE

**TOWN OF MOUNTAIN VILLAGE,
COLORADO, A HOME-RULE
MUNICIPALITY**

By: _____
Laila Benitez, Mayor

ATTEST:

Jackie Kennefick, Town Clerk

HEARD AND FINALLY ADOPTED by the Town Council of the Town of Mountain Village,
Colorado this ____ day of **July, 2018**

**TOWN OF MOUNTAIN VILLAGE
TOWN OF MOUNTAIN VILLAGE,
COLORADO, A HOME-RULE
MUNICIPALITY**

By: _____
Laila Benitez, Mayor

ATTEST:

Jackie Kennefick, Town Clerk

Approved As To Form:

Jim Mahoney, Assistant Town Attorney

I, Jackie Kennefick, the duly qualified and acting Town Clerk of the Town of Mountain Village, Colorado ("Town") do hereby certify that:

1. The attached copy of Ordinance No. _____ ("Ordinance") is a true, correct and complete copy thereof.

2. The Ordinance was introduced, read by title, approved on first reading with minor amendments and referred to public hearing by the Town Council the Town ("Council") at a regular meeting held at Town Hall, 455 Mountain Village Blvd., Mountain Village, Colorado, on _____, 2018, by the affirmative vote of a quorum of the Town Council as follows:

Council Member Name	"Yes"	"No"	Absent	Abstain
Laila Benitez, Mayor				
Dan Caton, Mayor Pro-Tem				
Dan Jansen				
Bruce MacIntire				
Patrick Berry				
Natalie Binder				
Jack Gilbride				

3. After the Council's approval of the first reading of the Ordinance, notice of the public hearing, containing the date, time and location of the public hearing and a description of the subject matter of the proposed Ordinance was posted and published in the Telluride Daily Planet, a newspaper of general circulation in the Town, on _____, 2018 in accordance with Section 5.2b of the Town of Mountain Village Home Rule Charter.

4. A public hearing on the Ordinance was held by the Town Council at a regular meeting of the Town Council held at Town Hall, 455 Mountain Village Blvd., Mountain Village, Colorado, on _____, 2018. At the public hearing, the Ordinance was considered, read by title, and approved without amendment by the Town Council, by the affirmative vote of a quorum of the Town Council as follows:

Council Member Name	"Yes"	"No"	Absent	Abstain
Laila Benitez, Mayor				
Dan Caton, Mayor Pro-Tem				
Dan Jansen				
Bruce MacIntire				
Patrick Berry				
Natalie Binder				
Jack Gilbride				

5. The Ordinance has been signed by the Mayor, sealed with the Town seal, attested by me as Town Clerk, and duly numbered and recorded in the official records of the Town.

IN WITNESS WHEREOF, I have hereunto set my hand and affixed the seal of the Town this ____ day of _____, 2018.

Jackie Kennefick, Town Clerk

(SEAL)



PLANNING & DEVELOPMENT SERVICES

455 Mountain Village Boulevard, Suite A
Mountain Village, CO 81435
(970) 728-1392

TO: Town Council
FROM: Sam Starr, Planner
FOR: June 14, 2018 Meeting
DATE: June 7, 2018
RE: Consideration of a Resolution Approving a Conditional Use Permit to Allow a Mining Sluice and Trampoline on Lot OS-3X, Heritage Plaza.

PROJECT GEOGRAPHY

Legal Description: Open Space Parcel OS-3X
Address: Heritage Plaza Mountain Village, Colorado
Applicant/Agent: Telluride Ski and Golf, LLC
Owner: Town of Mountain Village
Zoning: Active Open Space
Existing Use: public use pedestrian plaza
Proposed Use: Temporary Amusement featuring a Panning Sluice and trampoline
Lot Area: 2.726 acres
Adjacent Land Uses:

- **North:** Village Center
- **South:** Village Center
- **East:** Village Center
- **West:** Village Center

ATTACHMENTS

- Exhibit A: Conditional Use Permit Application & Applicant Narrative
- Exhibit B: Location Map
- Exhibit C: Sluice Photo
- Exhibit D: Quad Jumper Trampoline Photo
- Exhibit E: Conditional Use Permit Resolution

BACKGROUND

Gravity Play Entertainment, LLC (Gravity Play) has been operating a bungee trampoline, sluice and ropes course business on Heritage Plaza for the past eight years. Owing to financial circumstance, Gravity Play will cease operations of all activities in the plaza. Telluride Ski and Golf, LLC (TSG) has purchased the equipment from Gravity Play, and seeks to resume the operation of the mining sluice, trampoline and ropes course. This action will require a new Conditional Use permit on account of the change in ownership. The CUP requests are separated into two memos and resolutions because the sluice and trampoline are being requested on town owned property, while the ropes course is being request on TSG owned property.

PROJECT DESCRIPTION

Exhibit C shows the mining sluice on the south side of Heritage Plaza operating during the summer season. The amusement is a working replica of an actual mining sluice and provides guests with a hands-on educational activity. This unit is self-contained, and will have a minimal water consumption impact.

The Ropes course as featured on Exhibit D has been a long, ongoing attraction in the Town of Mountain Village. It has been used for both team building activities, and entertainment for visitors to Mountain Village. TSG proposes no changes to the ropes course, and will continue to operate this feature in the same way that Gravity Play has for the past six years. This will be featured as a separate Conditional Use Permit, as it is on Lot OS-3U

The only departure from the Gravity Play summer activities is the trampoline; TSG has purchased a new trampoline called the Quad Jumper which can be seen in Exhibit E.

CRITERIA AND ANALYSIS

In approving the Application, the DRB and Town Council must find the request meets the conditional use permit criteria contained in CDC Section 17.4.14(D). The criteria are:

- a) The proposed conditional use is in general conformity with the policies of the principles, policies and actions set forth in the Comprehensive Plan;
- b) The proposed conditional use is in harmony and compatible with surrounding land uses and the neighborhood and will not create a substantial adverse impact on adjacent properties or on services and infrastructure;
- c) The design, development and operation of the proposed conditional use shall not constitute a substantial physical hazard to the neighborhood, public facilities, infrastructure or open space;
- d) The design, development and operation of the proposed conditional use shall not have significant adverse effect to the surrounding property owners and uses;
- e) The design, development and operation of the proposed conditional use shall not have a significant adverse effect on open space or the purposes of the facilities owned by the Town;

- f) The design, development and operation of the proposed conditional use shall minimize adverse environmental and visual impacts to the extent possible considering the nature of the proposed conditional use;
- g) The design, development and operation of the proposed conditional use shall provide adequate infrastructure;
- h) The proposed conditional use does not potentially damage or contaminate any public, private, residential or agricultural water supply source; and
- i) The proposed conditional use permit meets all applicable Town regulations and standards.

Overall, Planning and Development Services Staff find that the operation of the mining sluice, ropes course, and trampoline have brought much needed vitality to Heritage Plaza. This Conditional Use Permit is a continuation of existing activities, and also meets all the required conditions laid forth in the Community Development Code.

STAFF RECOMMENDATION

Staff recommends approval of the Conditional Use Permit.

DRB RECOMMENDATION

On the June 7, 2018 Design Review Board meeting, the DRB voted 4-0 to recommend approval of the Conditional Use Permit with the following conditions

- 1. The Applicant shall enter into a Plaza License Agreement ("PLA") with the Town before beginning operation of the business;
- 2. The Applicant shall be required to place and operate the use as stated in their application;
- 3. The Applicant shall be required to obtain an agreement releasing, indemnifying and holding the Town harmless from any liability that may arise from the use, installation, repair and/or maintenance of the business;
- 4. The Business shall be allowed to operate generally from June 11th to August 14th between the hours of 10 am to 6 pm; Sunday through Saturday with the exception of Wednesday when operating hours shall be between the hours of 11 am to 6 pm and a Town approved sign indicating the operational hours shall be posted on site;
- 5. The Town shall have the right to temporarily relocate the Business to an alternate location within Heritage Plaza (OS-3X) if there are conflicts with festivals, special events or other uses of the plaza;
- 6. The Business must be operated in compliance with an Operation Plan submitted to and approved by the Town that described the operating, repair, maintenance and safety procedures;
- 7. The Business shall be allowed to operate under this approval for three (3) years; thereafter the use shall be reviewed and may be renewed by staff on an annual basis;
- 8. The Applicant shall incorporate local mining history into the educational display case with collaboration with Telluride Historical Museum staff; and
- 9. Applicant work to accommodate any future plans or study results originating from the Village Center Subarea Committee.

MOTION.

I move to approve a Conditional Use Permit for the operation of the sluice and trampoline on Open Space Parcel OS-3X with the following conditions:

1. The Applicant shall enter into a Plaza License Agreement ("PLA") with the Town before beginning operation of the business;
2. The Applicant shall be required to place and operate the use as stated in their application;
3. The Applicant shall be required to obtain an agreement releasing, indemnifying and holding the Town harmless from any liability that may arise from the use, installation, repair and/or maintenance of the business;
4. The Business shall be allowed to operate generally from June 11th to August 14th between the hours of 10 am to 6 pm; Sunday through Saturday with the exception of Wednesday when operating hours shall be between the hours of 11 am to 6 pm and a Town approved sign indicating the operational hours shall be posted on site;
5. The Town shall have the right to temporarily relocate the Business to an alternate location within Heritage Plaza (OS-3X) if there are conflicts with festivals, special events or other uses of the plaza;
6. The Business must be operated in compliance with an Operation Plan submitted to and approved by the Town that described the operating, repair, maintenance and safety procedures;
7. The Business shall be allowed to operate under this approval for three (3) years; thereafter the use shall be reviewed and may be renewed by staff on an annual basis
8. The Applicant shall incorporate local mining history into the educational display case with collaboration with Telluride Historical Museum staff; and.
9. Applicant work to accommodate any future plans or study results originating from the Village Center Subarea Committee.



CONDITIONAL USE PERMIT APPLICATION

PLANNING & DEVELOPMENT SERVICES
 455 Mountain Village Blvd. Suite A
 Mountain Village, CO 81435
 970-728-1392
 970-728-4342 Fax
 cd@mntvillage.org

CONDIONAL USE PERMIT APPLICATION			
APPLICANT INFORMATION			
Name:		E-mail Address:	
Mailing Address:		Phone:	
City:	State:	Zip Code:	
Mountain Village Business License Number:			
PROPERTY INFORMATION			
Physical Address:		Acreage: 2.726	
Zone District:	Zoning Designations:	Density Assigned to the Lot or Site:	
Legal Description:			
Existing Land Uses:			
Proposed Land Uses:			
OWNER INFORMATION			
Property Owner:		E-mail Address:	
Mailing Address:		Phone:	
City:	State:	Zip Code:	
DESCRIPTION OF REQUEST			



CONDITIONAL USE PERMIT APPLICATION

PLANNING & DEVELOPMENT SERVICES
 455 Mountain Village Blvd. Suite A
 Mountain Village, CO 81435
 970-728-1392
 970-728-4342 Fax
 cd@mtnvillage.org

CONDIONAL USE PERMIT APPLICATION			
APPLICANT INFORMATION			
Name:		E-mail Address:	
Mailing Address:		Phone:	
City:	State:	Zip Code:	
Mountain Village Business License Number:			
PROPERTY INFORMATION			
Physical Address:		Acreage: 2.726	
Zone District:	Zoning Designations:	Density Assigned to the Lot or Site:	
Legal Description:			
Existing Land Uses:			
Proposed Land Uses:			
OWNER INFORMATION			
Property Owner:		E-mail Address: cd@mtnvillage.org	
Mailing Address:		Phone: 728-1392	
City:	State:	Zip Code:	
DESCRIPTION OF REQUEST			



CONDITIONAL USE PERMIT APPLICATION

PLANNING & DEVELOPMENT SERVICES
 455 Mountain Village Blvd. Suite A
 Mountain Village, CO 81435
 970-728-1392
 970-728-4342 Fax
 cd@mtnvillage.org

CONDIONAL USE PERMIT APPLICATION			
APPLICANT INFORMATION			
Name:		E-mail Address:	
Mailing Address:		Phone:	
City:	State:	Zip Code:	
Mountain Village Business License Number:			
PROPERTY INFORMATION			
Physical Address:		Acreage:	
Zone District:	Zoning Designations:	Density Assigned to the Lot or Site:	
Legal Description:			
Existing Land Uses:			
Proposed Land Uses:			
OWNER INFORMATION			
Property Owner:		E-mail Address:	
Mailing Address:		Phone:	
City:	State:	Zip Code:	
DESCRIPTION OF REQUEST			

Carson Taylor
Director – Skier Services
Telluride Ski & Golf, LLC
April 23, 2018

Community Development Department
Planning Division
Town of Mountain Village
455 Mountain Village Blvd
Mountain Village, CO 81435

Dear Community Development Department:

The Telluride Adventure Center offers a multitude of easily accessible activities for spring, summer, and fall visitors alike. Starting this summer (2018) we have taken ownership of the historically offered adventure activities in Heritage Plaza and intend on operating the ropes course, mining sluice, and bungee trampoline with the service and professionalism standards set forth by the Telluride Ski & Golf Resort.

Our application request that all activities remain in their historical locations (see attached) as we continue to work hand in hand with AE COM and the Village Center Sub Area Committee on a long-term solution for the location(s) of the various summer activities. The Adventure Center is the natural business unit within Telluride Ski and Golf to oversee the sales, fulfillment, and operations of the summer activities per our 3-year tenure with the previous operator having already managed all aspects of the marketing, sales, fulfillment, and liability capture for all participating guests.

The primary goal in taking ownership of these summer activities is to foster a vibrant atmosphere in TMV's Heritage Plaza and further support the family -oriented activity demands of our summer guest demographic. The availability of these activities in line of sight and short walking distance from the Mountain Village Gondola Plaza draws ideal volumes of summer guests to businesses in the core, which in turn increases sales tax revenues for TMV and sales revenues for TMV merchants. We believe that maintaining the historical locations of the ropes course, mining sluice, and bungee trampoline summer activities in Heritage Plaza promote economic, social, cultural, and entertainment values that are otherwise being neglected.

For all activities, we intend to deploy a similar approach to marketing the summer, adventure activities as we do with our winter lift access segments i.e. bi-weekly e-newsletter, geo-targeted social media ad campaigns, direct mail, summer tourism guide (TTB), etc... We are also working closely with Bill Kight at the TMV to provide as much synergy in the marketing and communication efforts for all summer activities available at the Adventure Center.

Our operational objectives detail a June 11, 2018 opening, with a 7 day operational schedule (10am – 6pm) through September 3, 2018 (Labor Day). After Labor Day, we will remain open as business demands see it fit - with a potential weekend only operational schedule as demand dissipates. Signage for each activity is based from historical standards utilizing existing resources from previous years with all sales stemming from the Telluride Adventure Center located beneath the Mountain Village Gondola Plaza in what is the winter's lift ticket, pass, and ski school office.

Carson Taylor
Director – Skier Services



Area: 241.24 ft²
Perimeter: 80.92 ft

7.43 ft

565

2.726

TOWN

8223.44

TSG

697

562

Gondola

4.493

100 ft

21.69 ft

21.90 ft

38.79 ft

Area: 858.20 ft²
Perimeter: 122.39 ft

7013.16

TSG



christy sports
your ski and board shop

christy sports
your ski and board shop

christy sports
your ski and board shop

TELLURIDE

40% OFF
SKIS, BOOTS
& BINDINGS

40% OFF
CORRECTED
SPAREL

TELLURIDE COFFEE

it's easy as 1-2-3 to put
real gemstones in your hands.

- 1. Select a bag of mining rough enriched with real gemstones from around the world.
- 2. Place part of the rough from the bag in a screen bottom bag.
- 3. Dip the bag in the slates and watch the gemstones appear as the soil washes away.



**RESOLUTION OF THE TOWN COUNCIL
OF THE TOWN OF MOUNTAIN VILLAGE,
MOUNTAIN VILLAGE, COLORADO
APPROVING A CONDITIONAL USE PERMIT FOR THE INSTALLATION OF MINING
SLUICE AND TRAMPOLINE ATTRACTIONS ON ACTIVE OPEN SPACE, OS-3X**

Resolution No. 2018-0614-_____

1. The Town of Mountain Village (Owner) is the owner of record of real property described as Tract OS-3X, commonly referred to as Heritage Plaza; and
2. The Owner has consented to Telluride Ski and Golf, LLC (Applicant) pursuing the approval of a Conditional Use Permit to allow for the installation of mining sluice and trampoline attractions on Tract OS-3X, Town of Mountain Village and the Applicant has submitted such application requesting approval of the Conditional Use Permit; and
3. The proposed development is in compliance with the provisions of Section 14.4.14 of the Community Development Code (CDC); and
4. The Design Review Board (DRB) considered this application, along with evidence and testimony, at a public meeting held on June 7, 2018. Upon concluding their review, the DRB voted in favor of the Conditional Use Permit and recommended approval to the Town Council with conditions to be considered by the Town Council; and
5. The Town Council considered and approved this application subject to certain conditions as set forth in this resolution, along with evidence and testimony, at a public meeting held on June 14, 2018; and
6. The public hearings referred to above were preceded by publication of public notice of such hearings on such dates and/or dates from which such hearings were continued by mailing of public notice to property owners within four hundred feet (400') of the Property and posting the Property, as required by the CDC; and
7. The Applicant has addressed, or agreed to address and/or abide by, all conditions of approval of the Application imposed by Town Council based upon a recommendation for approval by the DRB; and
8. The Town Council finds the Application meets the Conditional Use Permit requirements contained in CDC Section 17.4.14 as follows:
 1. The proposed conditional use is in general conformity with the policies of the principles, policies and actions set forth in the Comprehensive Plan;
 2. The proposed conditional use is in harmony and compatible with surrounding land uses and the neighborhood and will not create a substantial adverse impact on adjacent properties or on services and infrastructure;
 3. The design, development and operation of the proposed conditional use shall not constitute a substantial physical hazard to the neighborhood, public facilities, infrastructure or open space;
 4. The design, development and operation of the proposed conditional use shall not have significant adverse effect to the surrounding property owners and uses;

5. The design, development and operation of the proposed conditional use shall not have a significant adverse effect on open space or the purposes of the facilities owned by the Town;
6. The design, development and operation of the proposed conditional use shall minimize adverse environmental and visual impacts to the extent possible considering the nature of the proposed conditional use;
7. The design, development and operation of the proposed conditional use shall provide adequate infrastructure;
8. The proposed conditional use does not potentially damage or contaminate any public, private, residential or agricultural water supply source; and
9. The proposed conditional use permit meets all applicable Town regulations and standards.

NOW, THEREFORE, BE IT RESOLVED THAT THE TOWN COUNCIL HEREBY APPROVES A CONDITIONAL USE PERMIT TO ALLOW FOR THE INSTALLATION OF MINING SLUICE, AND TRAMPOLINE ATTRACTIONS ON OS-3X AND AUTHORIZES THE MAYOR TO SIGN THE RESOLUTION SUBJECT TO CONDITIONS SET FORTH IN SECTION 1 BELOW:

1. The Applicant shall enter into a Plaza License Agreement ("PLA") with the Town before beginning operation of the business;
2. The Applicant shall be required to place and operate the use as stated in their application;
3. The Applicant shall be required to obtain an agreement releasing, indemnifying and holding the Town harmless from any liability that may arise from the use, installation, repair and/or maintenance of the business;
4. The Business shall be allowed to operate generally from June 11th to August 14th between the hours of 10 am to 6 pm; Sunday through Saturday with the exception of Wednesday when operating hours shall be between the hours of 11 am to 6 pm and a Town approved sign indicating the operational hours shall be posted on site;
5. The Town shall have the right to temporarily relocate the Business to an alternate location within Heritage Plaza (OS-3X) if there are conflicts with festivals, special events or other uses of the plaza;
6. The Business must be operated in compliance with an Operation Plan submitted to and approved by the Town that described the operating, repair, maintenance and safety procedures;
7. The Business shall be allowed to operate under this approval for three (3) years; thereafter the use shall be reviewed and may be renewed by staff on an annual basis; and
8. The Applicant shall incorporate local mining history into the educational display case and work to promote the Telluride Historical Museum with the collaboration of their staff.
9. Applicant work to accommodate any future plans or study results originating from the Village Center Subarea Committee.

Be It Further Resolved that OS-3X may be developed as submitted in accordance with Resolution No. 2018-0614-__

Approved by the Town Council at a public meeting June 14, 2018.

Town of Mountain Village, Town Council

By: _____
Laila Benitez, Mayor

Attest:

By: _____
Jackie Kennefick, Town Clerk

Approved as to Form:

James Mahoney, Assistant Town Attorney



PLANNING AND DEVELOPMENT SERVICES

455 Mountain Village Blvd.
Mountain Village, CO 81435
(970) 728-1392

TO: Town Council
FROM: Sam Starr, Town Planner
FOR: June 14, 2018 Meeting
DATE: June 7, 2018
RE: Consideration of a Resolution Approving a Conditional Use Permit to Allow a Ropes Course on Lot OS-3U

PROJECT GEOGRAPHY

Legal Description: OS-3U, Telluride Mountain Village
Address: No address assigned to Active Open Space
Applicant/Agent: Telluride Ski and Golf, LLC
Owner: Telluride Ski Resort
Zone District: Village Center
Zoning Designation: Active Open Space
Existing Use: Active Open Space
Proposed Use: Active Open Space
Adjacent Land Uses:

- **North:** Active Open Space, Village Center
- **South:** Active Open Space, Ski Area
- **East:** Active Open Space, Single Family
- **West:** Active Open Space, Village Center

ATTACHMENTS

- Exhibit A: CUP Application and Applicant Narrative
- Exhibit B: Ropes Course Photo
- Exhibit C: Resolution

BACKGROUND

Gravity Play Entertainment, LLC (Gravity Play) has been operating a bungee trampoline, sluice and ropes course business on Heritage Plaza for the past eight years. Owing to financial circumstance, Gravity Play will cease operations of all activities in the plaza. Telluride Ski and Golf, LLC (TSG) has purchased the equipment from Gravity Play, and seeks to resume the operation of the mining sluice, trampoline and ropes course. This action will require a new Conditional Use permit on account of the change in ownership.

CRITERIA AND ANALYSIS

In approving the Application, the DRB and Town Council must find the request meets the conditional use permit criteria contained in CDC Section 17.4.14(D). The criteria are:

- a) The proposed conditional use is in general conformity with the policies of the principles, policies and actions set forth in the Comprehensive Plan;
- b) The proposed conditional use is in harmony and compatible with surrounding land uses and the neighborhood and will not create a substantial adverse impact on adjacent properties or on services and infrastructure;
- c) The design, development and operation of the proposed conditional use shall not constitute a substantial physical hazard to the neighborhood, public facilities, infrastructure or open space;
- d) The design, development and operation of the proposed conditional use shall not have significant adverse effect to the surrounding property owners and uses;
- e) The design, development and operation of the proposed conditional use shall not have a significant adverse effect on open space or the purposes of the facilities owned by the Town;
- f) The design, development and operation of the proposed conditional use shall minimize adverse environmental and visual impacts to the extent possible considering the nature of the proposed conditional use;
- g) The design, development and operation of the proposed conditional use shall provide adequate infrastructure;
- h) The proposed conditional use does not potentially damage or contaminate any public, private, residential or agricultural water supply source; and
- i) The proposed conditional use permit meets all applicable Town regulations and standards.

2. It shall be the burden of the applicant to demonstrate that submittal material and the proposed development substantially comply with the conditional use permit review criteria.

The ropes course has been a long, ongoing attraction in the town. Moreover, such uses are common in ski resort communities to provide attractions in summer months. This Conditional Use Permit is a continuation of existing activities, and also meets all the required conditions laid forth in the Community Development Code.

STAFF RECOMMENDATION

Staff recommends council approve the Conditional Use Permit.

MOTION

I move to approve a Conditional Use Permit for the operation of the Ropes Course on Open Space Parcel OS-3U with the following conditions:

- 1. The Applicant shall maintain adequate bike traffic access from the bottom of the bike park to the Village Center plazas by working with plaza services to explore the option of rerouting mountain bicyclists for the safety of ropes course attendees and trail users. Additional options include exploring a range of fencing materials.

2. The Applicant shall secure the structure, including, without limitation, the pool, ladders, and other elements that might attract public access when closed.
3. In the event of water limitations or restrictions, the Applicant shall close the pool portion of the ropes course structure.
4. The Applicant shall re-surface all disturbed areas with landscaping and provide seating for spectators.
5. The Applicant shall provide an erosion control and drainage plan to ensure protection of the wetlands in the surrounding area.
6. The applicant shall revise the site and grading plan to have appropriate finished grade material, benches and simple landscaping to improve the appearance of the ropes course, site grading and the existing condition of the site.
7. The Conditional Use Permit shall be valid for a period of three years (3) with an annual review by the Planning Division staff, with the applicant responding to any valid issues as they arise during operation or the annual review.
8. Pending input from future plaza plans, applicant shall remain flexible to move additional programming into Sunset Plaza and/or Telluride Conference Center Plaza.

Carson Taylor
Director – Skier Services
Telluride Ski & Golf, LLC
April 23, 2018

Community Development Department
Planning Division
Town of Mountain Village
455 Mountain Village Blvd
Mountain Village, CO 81435

Dear Community Development Department:

The Telluride Adventure Center offers a multitude of easily accessible activities for spring, summer, and fall visitors alike. Starting this summer (2018) we have taken ownership of the historically offered adventure activities in Heritage Plaza and intend on operating the ropes course, mining sluice, and bungee trampoline with the service and professionalism standards set forth by the Telluride Ski & Golf Resort.

Our application request that all activities remain in their historical locations (see attached) as we continue to work hand in hand with AE COM and the Village Center Sub Area Committee on a long-term solution for the location(s) of the various summer activities. The Adventure Center is the natural business unit within Telluride Ski and Golf to oversee the sales, fulfillment, and operations of the summer activities per our 3-year tenure with the previous operator having already managed all aspects of the marketing, sales, fulfillment, and liability capture for all participating guests.

The primary goal in taking ownership of these summer activities is to foster a vibrant atmosphere in TMV's Heritage Plaza and further support the family -oriented activity demands of our summer guest demographic. The availability of these activities in line of sight and short walking distance from the Mountain Village Gondola Plaza draws ideal volumes of summer guests to businesses in the core, which in turn increases sales tax revenues for TMV and sales revenues for TMV merchants. We believe that maintaining the historical locations of the ropes course, mining sluice, and bungee trampoline summer activities in Heritage Plaza promote economic, social, cultural, and entertainment values that are otherwise being neglected.

For all activities, we intend to deploy a similar approach to marketing the summer, adventure activities as we do with our winter lift access segments i.e. bi-weekly e-newsletter, geo-targeted social media ad campaigns, direct mail, summer tourism guide (TTB), etc... We are also working closely with Bill Kight at the TMV to provide as much synergy in the marketing and communication efforts for all summer activities available at the Adventure Center.

Our operational objectives detail a June 11, 2018 opening, with a 7 day operational schedule (10am – 6pm) through September 3, 2018 (Labor Day). After Labor Day, we will remain open as business demands see it fit - with a potential weekend only operational schedule as demand dissipates. Signage for each activity is based from historical standards utilizing existing resources from previous years with all sales stemming from the Telluride Adventure Center located beneath the Mountain Village Gondola Plaza in what is the winter's lift ticket, pass, and ski school office.

Carson Taylor
Director – Skier Services



CONDITIONAL USE PERMIT APPLICATION

PLANNING & DEVELOPMENT SERVICES
 455 Mountain Village Blvd. Suite A
 Mountain Village, CO 81435
 970-728-1392
 970-728-4342 Fax
 cd@mtnvillage.org

CONDIONAL USE PERMIT APPLICATION			
APPLICANT INFORMATION			
Name:		E-mail Address:	
Mailing Address:		Phone:	
City:	State:	Zip Code:	
Mountain Village Business License Number:			
PROPERTY INFORMATION			
Physical Address:		Acreage: 2.726	
Zone District:	Zoning Designations:	Density Assigned to the Lot or Site:	
Legal Description:			
Existing Land Uses:			
Proposed Land Uses:			
OWNER INFORMATION			
Property Owner:		E-mail Address:	
Mailing Address:		Phone:	
City:	State:	Zip Code:	
DESCRIPTION OF REQUEST			



CONDITIONAL USE PERMIT APPLICATION

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APPLICANT INFORMATION			
Name:		E-mail Address:	
Mailing Address:		Phone:	
City:	State:	Zip Code:	
Mountain Village Business License Number:			
PROPERTY INFORMATION			
Physical Address:		Acreage: 2.726	
Zone District:	Zoning Designations:	Density Assigned to the Lot or Site:	
Legal Description:			
Existing Land Uses:			
Proposed Land Uses:			
OWNER INFORMATION			
Property Owner:		E-mail Address: cd@mtnvillage.org	
Mailing Address:		Phone: 728-1392	
City:	State:	Zip Code:	
DESCRIPTION OF REQUEST			



CONDITIONAL USE PERMIT APPLICATION

PLANNING & DEVELOPMENT SERVICES
 455 Mountain Village Blvd. Suite A
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CONDIONAL USE PERMIT APPLICATION			
APPLICANT INFORMATION			
Name:		E-mail Address:	
Mailing Address:		Phone:	
City:	State:	Zip Code:	
Mountain Village Business License Number:			
PROPERTY INFORMATION			
Physical Address:		Acreage:	
Zone District:	Zoning Designations:	Density Assigned to the Lot or Site:	
Legal Description:			
Existing Land Uses:			
Proposed Land Uses:			
OWNER INFORMATION			
Property Owner:		E-mail Address:	
Mailing Address:		Phone:	
City:	State:	Zip Code:	
DESCRIPTION OF REQUEST			



Area: 241.24 ft²
Perimeter: 80.92 ft

7.43 ft

565

2.726

TOWN

8223.44

TSG

697

562

Gondola

4.493

Area: 858.20 ft²
Perimeter: 122.39 ft

00 ft

21.69 ft

38.79 ft

21.90 ft

7013.16

TSG

**RESOLUTION OF THE TOWN COUNCIL
OF THE TOWN OF MOUNTAIN VILLAGE,
MOUNTAIN VILLAGE, COLORADO
APPROVING A CONDITIONAL USE PERMIT FOR THE INSTALLATION OF A
TEMPORARY ROPES COURSE STRUCTURE ON ACTIVE OPEN SPACE, OS-3U**

Resolution No. 2018-0614-_____

- A. TSG Ski & Golf, LLC is the owner of record of real property described as Tract OS-3U, Town of Mountain Village (Owner); and
- B. The Owner has applied as the “Applicant” to pursue the approval of the Conditional Use Permit to allow for the installation of a temporary ropes course structure on Tract OS-3U; and
- C. The proposed development is in compliance with the provisions of Section 14.4.14 of the Community Development Code (CDC); and
- D. The Design Review Board (DRB) considered this application, along with evidence and testimony, at a public meeting held on June 7, 2018. Upon concluding their review, the DRB voted in favor of the Conditional Use Permit and recommended approval to the Town Council subject to certain conditions as set forth in this resolution; and
- E. The Town Council considered and approved this application, along with evidence and testimony, at a public meeting held on June 14, 2018; and
- F. The public hearings referred to above were preceded by publication of public notice of such hearings on such dates and/or dates from which such hearings were continued by mailing of public notice to property owners within four hundred feet (400') of the Property, as required by the CDC; and
- G. After the public hearings referred to above, the DRB and the Town Council each individually considered the Application submittal materials, and all other relevant materials, public letters and public testimony, and approved the Application with conditions as set forth in this Resolution; and
- H. The Applicant has addressed, or agreed to address, all conditions of approval of the Application imposed by Town Council based upon a recommendation for approval by the DRB; and
- I. The Town Council finds the Application meets the Conditional Use Permit requirements contained in CDC Section 17.4.14 as follows:
 - 1. The proposed conditional use is in general conformity with the policies of the principles, policies and actions set forth in the Comprehensive Plan;
 - 2. The proposed conditional use is in harmony and compatible with surrounding land uses and the neighborhood and will not create a substantial adverse impact on adjacent properties or on services and infrastructure;
 - 3. The design, development and operation of the proposed conditional use shall not constitute a substantial physical hazard to the neighborhood, public facilities, infrastructure or open space;
 - 4. The design, development and operation of the proposed conditional use shall not have significant adverse effect to the surrounding property owners and uses;

5. The design, development and operation of the proposed conditional use shall not have a significant adverse effect on open space or the purposes of the facilities owned by the Town;
6. The design, development and operation of the proposed conditional use shall minimize adverse environmental and visual impacts to the extent possible considering the nature of the proposed conditional use;
7. The design, development and operation of the proposed conditional use shall provide adequate infrastructure;
8. The proposed conditional use does not potentially damage or contaminate any public, private, residential or agricultural water supply source; and
9. The proposed conditional use permit meets all applicable Town regulations and standards.

NOW, THEREFORE, BE IT RESOLVED THAT THE TOWN COUNCIL HEREBY APPROVES A CONDITIONAL USE PERMIT TO ALLOW FOR THE INSTALLATION OF A TEMPORARY ROPES COURSE STRUCTURE ON OS-3U AND AUTHORIZES THE MAYOR TO SIGN THE RESOLUTION SUBJECT TO CONDITIONS SET FORTH IN SECTION 1 BELOW:

1. The Applicant shall maintain adequate bike traffic access from the bottom of the bike park to the Village Center plazas by working with plaza services to explore the option of rerouting mountain bicyclists for the safety of ropes course attendees and trail users. Additional options include exploring a range of fencing materials.
2. The Applicant shall secure the structure, including, without limitation, the pool, ladders, and other elements that might attract public access when closed.
3. In the event of water limitations or restrictions, the Applicant shall close the pool portion of the ropes course structure.
4. The Applicant shall re-surface all disturbed areas with landscaping and provide seating for spectators.
5. The Applicant shall provide an erosion control and drainage plan to ensure protection of the wetlands in the surrounding area.
6. The applicant shall revise the site and grading plan to have appropriate finished grade material, benches and simple landscaping to improve the appearance of the ropes course, site grading and the existing condition of the site.
7. The Conditional Use Permit shall be valid for a period of three years (3) with an annual review by the Planning Division staff, with the applicant responding to any valid issues as they arise during operation or the annual review.
8. Pending input from future plaza plans, applicant shall remain flexible to move additional programming into Sunset Plaza and/or Telluride Conference Center Plaza.

Be It Further Resolved that OS-3U may be developed as submitted in accordance with Resolution NO. 2018-0614-__

Approved by the Town Council at a public meeting June 14, 2018.

Town of Mountain Village, Town Council

By: _____
Laila Benitez, Mayor

Attest:

By: _____
Jackie Kennefick, Town Clerk

Approved as to Form:

James Mahoney, Assistant Town Attorney

Dear Mountain Village Town Council,

Sheep Mountain Alliance appreciates the Council's past support of the San Juan Mountains Wilderness Bill, which was introduced to Congress last month. We believe that the current bill does an excellent job of toeing the line between compromise and protection, as it includes new provisions that are the result of extensive work with mountain biking groups and the Ouray Silver Mine. The major changes to this bill are the following:

- Expanded mountain biking opportunities have been created to allow for continued use of an informal trail system in Ophir Valley within the Sheep Mountain Special Management Area.
- We have made minor alterations to the boundary of the White House and Liberty Bell additions to accommodate the safety-related requests of the Ouray Silver Mine

We hope that the Mountain Village Town Council will express its thanks to Senator Bennet for reintroducing the Bill, and ask that Senator Gardner and Congressman Tipton add their support to see it through Congress.

In addition, please consider writing to the GMUG National Forest in support of Sheep Mountain Alliance's wilderness recommendations. In our area, these wilderness recommendations align closely with the proposed borders of the recently introduced San Juan Mountains Wilderness Bill. A couple of other additions include a small area on the far west side of the Lizard Head Wilderness, in East Beaver Creek, and an area around Lone Cone to be recommended for Special Management Designation. We believe that both of these areas, which currently lack substantive special designation, are worthy of protection, and we have endeavoured to ensure that no conflicting uses exist within these areas. The wilderness inventory process only happens every 30 or so years and this is a chance to make sure that any lands we think might be worthy of protection are included before further development renders them incompatible with wilderness values. I am happy to answer any questions the council may have via phone at (617) 285-4715, or via email at lexi@sheepmountainalliance.org.

Thank you for your time,
Lexi Tuddenham
Executive Director
Sheep Mountain Alliance

GMUG National Forest Recommended Wilderness and Special Interest Areas

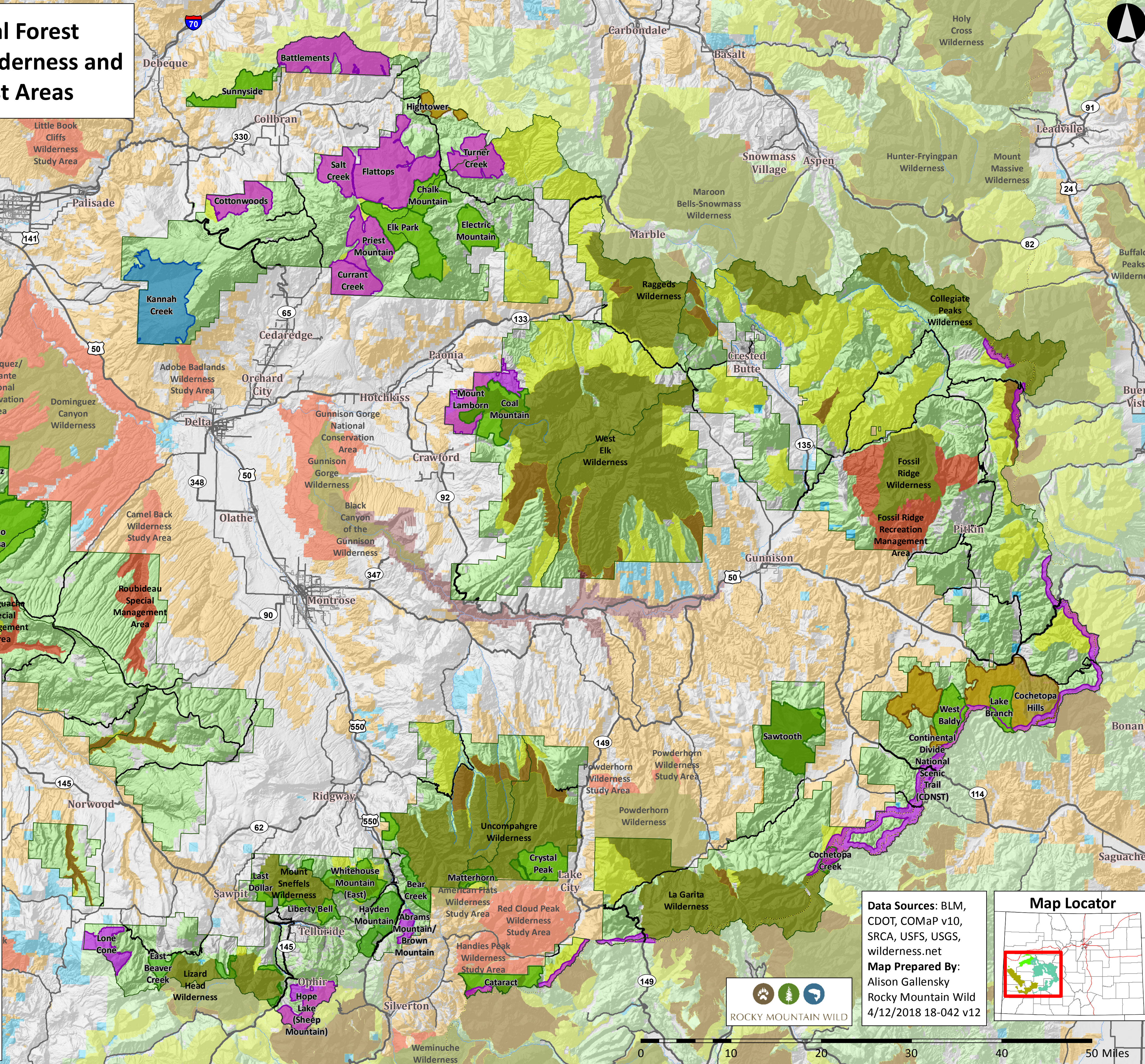


Legend

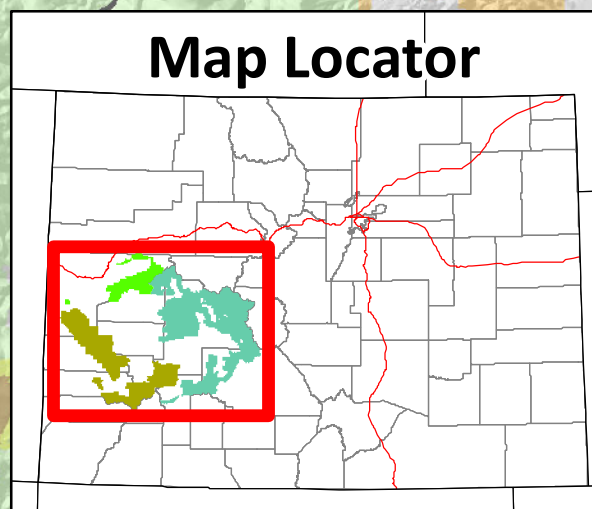
- Forest Service District
- CDNST
- Recommended Wilderness
- Special Interest Area
- Linkage Area
- Watershed Protection Area
- Upper Tier Roadless Area
- Roadless Area (FS)
- Other Protected Areas
- Designated Wilderness

Land Ownership

- USFS
- BLM
- NPS
- State
- Other Public
- Private/Tribe



Data Sources: BLM, CDOT, COMaP v10, SRCA, USFS, USGS, wilderness.usg
Map Prepared By: Alison Gallensky
 Rocky Mountain Wild
 4/12/2018 18-042 v12



The Wilderness Society • High Country Conservation Advocates • Rocky Smith • Wilderness Workshop
• Great Old Broads for Wilderness • Western Environmental Law Center • Rocky Mountain Wild •
Defenders of Wildlife • Ridgway Ouray Community Council

Forest Planning Team
GMUG National Forest
2250 Highway 50
Delta, CO 81416

March 6, 2018

Dear GMUG Planning Team,

Please accept these comments on the draft wilderness evaluation criteria from The Wilderness Society, High Country Conservation Advocates, Rocky Smith, Wilderness Workshop, Great Old Broads for Wilderness, Western Environmental Law Center, Rocky Mountain Wild, Defenders of Wildlife, and Ridgway Ouray Community Council. The Grand Mesa-Uncompahgre-Gunnison National Forest (GMUG) posted the draft evaluation criteria online¹ on February 20, 2018 and set March 6, 2018 as the deadline for submitting comments. Thank you for the opportunity to provide feedback on the draft evaluation criteria.

Criterion 1: Apparent Naturalness

The guiding principle in evaluating the apparent naturalness of a polygon is whether the overall area appears to be affected primarily by the forces of nature, with the imprints of modern human activity substantially unnoticeable. The standard for this criterion is how natural the area would appear to an average, reasonable person.² The most common mistake in evaluating apparent naturalness is to assess the degree to which the area is ecologically unblemished, which is a distinctly different inquiry than assessing whether the area looks natural, or, put another way, does not appear substantially modified by past human activities. For the most part, we like how the GMUG framed Criterion 1 as the questions are designed to discern past management activities that make the landscape look anthropomorphically modified. Question 1a, however, would benefit from further clarification that the inquiry is not about ecological purity of the area but rather about its natural appearance. See Exhibit 1. We recommend that you modify the first evaluation consideration under Question 1a to say: “Does the composition of plant and animal communities appear substantially unnatural (for example, past management activities have created a plantation style forest with trees of a uniform species, age, and planted in rows)?”

¹ <https://www.fs.usda.gov/detail/gmug/landmanagement/planning/?cid=fseprd500301>

² See Gila National Forest Draft Wilderness Evaluation Process Paper, Page 5. Published October 2017. Also see Exhibit 1 that contains relevant excerpts from the *Q&As Relating to Wilderness Planning Under Chapter 70 of the 2015 Planning Rule Directives, Version 1.1*.

Criterion 2: Solitude OR Primitive and Unconfined Recreation

While the text on page 6 emphasizes that this criterion is solitude OR primitive or unconfined recreation, the text on pages 1-3 (in the section describing how to rank evaluation polygons) seems to conflate the two concepts. The process paper should make clear that a polygon need not have both of these characteristics, and that the polygon should receive a rank for this criterion that reflects the higher of the individual ranks for solitude and unconfined primitive recreation.

Under Question 2b, the draft paper defines high-quality primitive and unconfined recreation as activities that typically are “challenging and/or require elevated self-reliance...[with] a lack of facilities and equipment, as well as a lack of rule/regulations.” Draft paper, page 6. We disagree that a precursor to high quality primitive or unconfined recreation is lack of equipment or rules. In fact, most people who recreate in wild places carry backpacks or use other types of equipment (e.g., hunters use rifles; skiers use skis; some winter visitors use snowshoes, hikers use hiking poles and crampons), and some wilderness-based activities are governed by widely accepted rules (e.g., hunters and anglers must have licenses).^{3,4} We recommend that you modify this definition by removing the second sentence.

In the third bullet under Question 2b, we suggest you use the list provided in FSH 1909.12, chapter 70, section 72.1 (2)(b) of examples of primitive/unconfined recreational activities. These are: observing wildlife, hiking, backpacking, horseback riding, fishing, hunting, floating, kayaking, cross-country skiing, camping, and enjoying nature.

Criterion 4: Unique and outstanding qualities

Question 4a: In addition to the bullet provided, we suggest that you add the following additional bullets:

- Does the polygon contain or overlap with Potential Conservation Areas designated by the Colorado Natural Heritage Program?⁵
- Does the polygon contain ecosystems that are underrepresented in the current network of protected area, at the forest, regional or national scale? Given climate change, the presence of under-protected ecosystems is becoming an increasingly important and unique characteristic.⁶
- Does the area provide a unique or outstanding ecological function (for instance, serves as an important wildlife corridor or nesting area)?

³ The Wilderness Act itself in fact imposes rules and regulations on managers and users of Wilderness areas.

⁴ We suspect that this question may flow from The Wilderness Act’s use of the word untrammled which some define as uncontrolled, unconfined or without human modifications or manipulations. For a discussion of the word untrammled, see Kevin Proescholdt, *Untrammled Wilderness*, in *Minnesota History*, Vol. 61, Fall 2008, pp. 114-123 available at <http://wildernesswatch.org/pdf/Untrammled.pdf>.

⁵ See http://www.cnhp.colostate.edu/download/gis/pca_reports.asp.

⁶ See Appendix 1 of the letter submitted by TWS et al on January 17, 2017 and reattached here as Exhibit 2. The last section starting on page 43 provides an example of how the information can be incorporated into potential wilderness area narratives. *Also see* Dietz et al, 2015 (“Human population growth, climate change, and pressure for development and extraction of natural resources make wilderness and other protected areas increasingly vital to conserve biological diversity.”)

Criterion 5: Manageability

The evaluation of “the degree to which the area may be managed to preserve its wilderness characteristics” is meant to address whether and how the geographical shape and configuration of the area and any governing legal requirements might frustrate wilderness management. FSH 1909.12, Chap. 70, Sec. 72.1(5). For instance, numerous cherry-stemmed roads that create narrow fingers, or narrow strips connecting different parts of the area may frustrate wilderness management. Similarly, legally established rights or uses within the area (e.g., rights of access to private land inholdings or energy leases) may also frustrate wilderness management. Agency-authorized uses such as motorized recreation are not rights or uses established by law and are not relevant to the evaluation of manageability. Similarly, demographic factors such as distance to and size of nearby population centers are also not relevant. Current and future management of polygons is appropriately considered in the analysis phase. Lastly, note that manageability concerns that are identified in the evaluation can sometimes be addressed by adjusting the boundaries of the polygon.

Given the intent of the manageability inquiry, several of the bullets under this criterion should be removed, clarified, or modified because they are not relevant as drafted. We recommend the following changes to the bulleted questions provided in the draft process paper. Italicized text denote our comments. Recommended modifications are denoted with strikethrough text for words that should be removed, and bolded text for words that should be added.

- How could the shape/size of the polygon aid or impede the ability to manage the polygon to preserve its wilderness characteristics? *We recommend adding:* Can any manageability problems be minimized by adjusting the polygon’s boundaries?
- How could the terrain of the polygon aid or impede the ability to manage the polygon to preserve its wilderness characteristics? *We are not sure how terrain could aid or impede the agency’s ability to manage an area to preserve its wilderness characteristics. Either provide clarification on how terrain is relevant or delete.*
- What is the presence and extent of existing rights of use in the polygon? (mineral rights, water rights, easements, leases).
- How could the polygon’s amount and variety (motorized, mechanized, non-motorized) of access routes aid or impede the ability to manage the polygon to preserve its wilderness characteristics? *This question should be removed as current management or future management tradeoffs are inappropriate to consider in the evaluation phase as discussed above.*
- What is the extent of non-Federal lands and non-federal access ~~adjacent~~ **within** to the polygon? Would the presence of these lands/access aid or impede the ability to manage the polygon to preserve its wilderness characteristics? *This question should be modified or clarified. While the distribution, extent, and type of non-federal lands within the polygon is relevant to this inquiry, we do not understand how the tenure of lands outside of the polygon is relevant.*
- What is the general management of adjacent lands, and what entities administer those lands? *This question should be removed because it is not relevant to the inquiry about manageability. If*

the lands currently qualify for wilderness under the current management scheme of adjacent lands, then presumably they will continue to possess wilderness characteristics in the future.

- What are the current types and extent of ~~management~~ **legal** restrictions within the polygon (i.e., designated critical habitat), **and to what degree do they affect the agency's ability to manage the polygon** to preserve its wilderness characteristics?
- Are there "cherry-stemmed" roads or other linear features immediately adjacent to the polygon? If so, what would be their influence on the polygon itself? *We presume that the purpose of this question is to look at the cherry-stemmed features that may result in a convoluted polygon boundary. If this is the case, we recommend removing it as the concept is adequately addressed in the first question related to size and configuration of the area. If we misunderstand the intent of the question, please clarify.*
- Does the polygon include any Colorado Roadless Areas? *This question could be removed because it is covered by the bullet above about current legal restrictions.*
- Ancillary considerations: Existing recreation activities (motorized, mechanized, and non-motorized), grazing activities, mining activities, cultural and traditional uses, special uses, current management, etc. *This bullet should be removed as current management or future management trade-offs are inappropriate to consider in the evaluation phase as discussed above.*

Wilderness Characteristics Summary Ratings

Our comments above on specific criteria apply to this section on pages 2-3, and hence will not be repeated here. We strongly recommend that the GMUG create a table that describes conditions that would merit ranks of outstanding, high, moderate, or low for each criterion. For instance, see the ranking framework drafted by the Gila National Forest in its Draft Wilderness Evaluation Process Paper, starting at page 5.⁷ In doing this, the public can easily see how each criterion was ranked and why. Lastly, it is inappropriate to consider proximity to population centers, roads, and private lands in ranking areas for the degree to which they have wilderness character. See draft process paper, page 2. This criterion has no basis in statute, regulation or policy, and should be removed.

Thank you very much for the opportunity to comment on the draft wilderness evaluation process paper. We look forward to commenting on the draft evaluation report when it becomes available. As always,

⁷ *Supra*, Starting at page 5. While we like the framework that the Gila created, there are elements of the Gila's process paper that we recommended be changed. For instance, we disagreed with the Gila National Forest's approach to manageability, and prefer a ranking system with high/medium/low values as opposed to numeric rankings. Exhibit 3 is an excerpt from the comment letter submitted to the Gila National Forest on the draft evaluation process paper by TWS et al in December 2017.

please do not hesitate to contact us if you have questions, and thank you for your hard work on the forest plan revision process.

With regards,

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jimphoto@montrose.net

Cited references

Dietz, M.S., R.T. Belote, G.H. Aplet, & J.L. Aycrigg. 2015. *The world's largest wilderness protection network after 50 years: An assessment of ecosystem representation in the U.S. National Wilderness Preservation System*. *Biological Conservation*, 184: 431-438. Available at <http://www.sciencedirect.com/science/article/pii/S0006320715000944>.

Exhibit 1: Excerpts from the Q&As Relating to Wilderness Planning Under Chapter 70 of the 2015 Planning Rule Directives, Version 1.1

Q: *In conducting an evaluation of “apparent naturalness,” the directives provide the following example for determining “if plant and animal communities appear substantially unnatural”: “past management activities have created a plantation style forest with trees of a uniform species, age, and planted in rows.” FSH 1909.12, Chap. 70, Sec. 72.1(1)(a). What are some other examples of relevant considerations for this evaluation factor?*

A: The determination of whether plant and animal communities in an area “appear substantially unnatural” is a professional judgement within the discretion of the Responsible Official, as informed by the Interdisciplinary Team and public input. One possible interpretation of “apparent naturalness” could be based on whether the area “looks natural” to a reasonable person. Using the example provided, a plantation style forest would likely not look natural to a reasonable person and therefore is a relevant factor to consider when evaluating whether the plant and animal communities in an area appear substantially unnatural. Another example might be the presence of invasive non-native species in an area that are so extensive that it dominates the landscape in a readily apparent manner. Other relevant examples may exist and are best identified at the local level. In all instances, such considerations should be well documented.

Q: *In conducting an evaluation of “apparent naturalness,” should stand composition that is significantly different from historic conditions be taken into consideration?*

A: Possibly. If the current stand composition reflects the effects of past management activities (i.e. fire suppression, timber harvest, or other activities), those effects may be taken into account in your evaluation. The ultimate questions are within the Responsible Official’s judgment. Does it appear that the imprints of human management intervention are substantially unnoticeable? Or, has past management left the area with clear indications that the area has been subject to human intervention in the past? See FSH 1909.12, Chap. 70, Sec. 72.1. For example, if fire suppression has not altered the species composition, but has left the stands more dense than they would otherwise have been, that might not weigh as heavily against apparent naturalness, since it may not be as noticeable. On the other hand, if past fire suppression has allowed displacement of fire-dependent species with less fire tolerant species, that change might weigh more heavily against the apparent naturalness of that area because the effects of past human management are more noticeable. It is important to remember, however, that it is difficult in most cases to tie a particular change in stand composition to actual human intervention as opposed to natural variability and change over time. If there is insufficient information to tie particular changes

in stand composition to human intervention, it might not weigh as heavily against your evaluation of the apparent naturalness of the area.

Exhibit 2: Ecosystem Representation of Protected Areas in the GMUG National Forests

Appendix 1: Ecosystem Representation of Protected Areas in the GMUG National Forests

These comments address the role of ecosystem representation in the GMUG National Forests' land management planning process – particularly its evaluation of areas that may be suitable for inclusion in the National Wilderness Preservation System (NWPS). As explained below and illustrated by the accompanying maps and data, the GMUG National Forests hosts numerous ecosystem types that are poorly-represented in the NWPS both regionally and nationally. Given the central importance of ecosystem diversity to conserving biological diversity and satisfying the requirements of the 2012 National Forest System Land Management Planning Rule, 36 C.F.R. part 219, the ongoing wilderness evaluation and planning process presents a crucial opportunity for the GMUG National Forests to increase the diversity of ecosystems that are protected as part of the NWPS or through other special designations.

I. Ecological Importance of Ecosystem Representation in Wilderness and Other Protected Areas

Wilderness and other protected conservation areas are the cornerstones of most regional, national, and international efforts to conserve biological diversity and ecological processes of natural ecosystems (Bertzky *et al.* 2012). Research has shown that protected areas reduce the loss, degradation, and fragmentation of natural habitats (Bruner *et al.* 2001; Naughton-Treves *et al.* 2005) and slow the rate of extinction of threatened species that occur therein (Butchart *et al.* 2012). Conversely, federal public lands in the United States that are managed for a variety of uses including mining, logging, and motorized recreation – and not primarily for conservation purposes – do not have the same benefits. Recognizing the central importance of protected areas in conserving biological diversity, the International Convention on Biological Diversity recommends that at least 17% of the world's terrestrial areas be conserved by 2020 (Woodley *et al.* 2012). To that end, the NWPS already serves as the world's largest national system of highly-protected conservation areas.¹

Wilderness and other protected areas, however, can help achieve biodiversity targets only if they are located in the right places – that is, if they are ecologically representative of terrestrial ecosystems. This “representation” approach assumes that for protected areas to conserve genetic, species, and community diversity – as well as the composition, structure, function, and evolutionary potential of natural systems – they

¹ The NWPS contains 21 million hectares in 690 units, covering nearly 1/5 of what the International Union for Conservation of Nature (IUCN) classifies as “category 1 areas,” or the most natural and highly protected areas worldwide. By contrast, the IUCN classifies general Forest Service matrix lands as “GAP Status 3” – “Area having permanent protection from conversion of natural land cover for the majority of area. Subject to extractive uses of either broad, low-intensity type (eg. Logging) or localized intense type (eg. Mining).” – which is not considered a “protected” category for biodiversity purposes.

must encompass the full variety of ecosystems (Olson & Dinerstein 1998; Margules & Pressey 2000). In other words, protection of distinct ecological communities in turn protects the species that rely on them and the natural ecological processes that are characteristic of those ecosystems (Rodrigues *et al.* 2004; Bunce *et al.* 2013). According to the Convention on Biological Diversity, the percentage of terrestrial ecosystems protected by 2020 (with a target of 17%) is one indicator of how well ecosystems are represented throughout the global network of protected conservation areas (Woodley *et al.* 2012).

Despite its importance, our analysis of ecosystem representation in the NWPS (Dietz *et al.* 2015) – which is described in detail below – shows that the NWPS suffers from a significant under-representation of many ecosystems. Over 20% (117) of the 553 types of unique ecosystems occurring on federal lands in the contiguous United States are not included in the NWPS. Even more concerning is that less than half of those 553 ecosystems are more than nominally represented: only 244 ecosystem types have at least 5% of their federal land area protected in the NWPS. And at a more reasonable 20% target for biodiversity conservation purposes, that number falls to only 113 ecosystems with at least 20% of their federal land area protected in the NWPS. 95% of that diversity was achieved by 1994, and wilderness designations over the past 15 years have added only 1 new ecosystem type above the 20% threshold. Moreover, there is not a clear correlation between how rare an ecosystem is on federal lands and how well it is represented in the NWPS. We found that there are many ecosystem types that are common on federal lands (covering over 100,000 hectares) but are poorly represented in the NWPS.

With the Wilderness Act over 50 years old (signed into law on September 3, 1964), it is important to begin to remedy this under-representation of ecosystems in the NWPS. Human population growth, climate change, and pressure for development and extraction of natural resources make wilderness and other protected areas increasingly vital to conserve biological diversity. Given those pressures and stressors, we must establish a network of connected wilderness and other protected areas that represent the full expression of ecosystem diversity.

II. Regulatory Requirements to Evaluate Ecosystem Representation

Given the regional, national, and global importance of ecosystem representation in the NWPS and other protected areas, the 2012 National Forest System Land Management Planning Rule requires the Forest Service to evaluate and incorporate ecosystem representation into its forest assessment and planning processes. Indeed, protecting ecosystem diversity is a central purpose of forest planning under the Rule:

Plans will guide management of [National Forest System] land so that they are ecologically sustainable and contribute to social and economic sustainability; ***consist of ecosystems and watersheds with*** ecological

integrity and ***diverse plant and animal communities***; and have the capacity to provide people and communities with ecosystem services and multiple uses that provide a range of social, economic, and ecological benefits for the present and into the future.

36 C.F.R. § 219.1(c) (emphasis added).

To satisfy the 2012 Planning Rule’s ecosystem diversity mandate, forests are first required to identify and evaluate existing designated areas, including wilderness, and the potential need and opportunity for additional designated areas as part of the assessment phase. *Id.* § 219.6(b)(15). In doing so, the assessment should consider, among other things, whether there are “specific land types or ecosystems present in the plan area that are not currently represented or minimally represented within the wilderness system or system of research natural areas.” Forest Service Handbook (FSH) 1909.12, ch. 10, § 14 (Feb. 14, 2013 draft).

Next, during the plan development or revision phase, the Forest Service is required to “[i]dentify and evaluate lands that may be suitable for inclusion in the [NWPS] and determine whether to recommend any such lands for wilderness designation.” 36 C.F.R. § 219.7(c)(2)(v). In evaluating potential wilderness areas, the agency must, among other things, “[e]valuate the degree to which the area may also contain ecological, geological, or other features of scientific, educational, scenic, or historical value.” FSH 1909.12, ch. 70, § 72.1(4); *see also* 16 U.S.C. § 1131(c)(4) (wilderness, as defined by the Wilderness Act of 1964, “may also contain ecological, geological, or other features of scientific, educational, scenic, or historical value”). “Such features or values may include [r]are plant or animal communities or rare ecosystems,” with rare being “determined locally, regionally, nationally, or within the system of protected designations.” FSH 1909.12, ch. 70, § 72.1(4).

In addition to identifying and evaluating areas to recommend for wilderness designation, the 2012 Planning Rule also requires the agency to “[i]dentify existing designated areas other than [wilderness] and determine whether to recommend any additional areas for designation.” 36 C.F.R. § 219.7(c)(2)(vii). Those special designations may include, for example, ecological areas, botanical areas, or Research Natural Areas (RNAs), which are designed to “[m]aintain a wide spectrum of high quality representative areas that represent the major forms of variability . . . that, in combination, form a national network of ecological areas for research, education, and maintenance of biological diversity . . . [and s]erve as a baseline area for measuring long-term ecological changes.” Forest Service Manual 4063.02; *see also* 36 C.F.R. § 219.19 (Forest Service may designate RNAs as part of planning process).

Complementing the requirement to consider ecosystem representation in determining suitability for wilderness and other special designations, the 2012 Planning Rule directs that plans generally provide for ecological sustainability and integrity and “the diversity

of plant and animal communities and the persistence of native species.” 36 C.F.R. §§ 219.8-219.9. The Forest Service cannot satisfy those substantive mandates without adequately protecting ecosystem diversity in the plan area. For example, plans “must include plan components, including standards or guidelines, to maintain or restore the diversity of ecosystems and habitat types[, including r]are . . . plant and animal communities.” *Id.* § 219.9(a)(2). With conflicting management and resource demands and human-caused stressors such as climate change that threaten ecosystem diversity and integrity, plans simply cannot restore or maintain the diversity of plant and animal communities absent a robust network of protected areas that adequately represent that diversity.

Collectively, these various procedural and substantive mandates commit the agency to a meaningful evaluation and consideration of under-represented and rare ecosystems, and to formulating and adopting plan components, recommendations, and designations that adequately protect and preserve the forest’s diversity of plant and animal communities. In doing so, the agency is required to use “the best available scientific information.” *Id.* § 219.3. As described in the methodology section below, we believe our analysis of ecosystem representation represents the best available scientific information, and we encourage the Forest Service to incorporate it into its wilderness evaluation and the broader planning process.

III. Methods and Analysis of Ecosystem Representation

We conducted an analysis of ecosystem representation in wilderness at the national- and forest-level scales to provide the best available scientific information for the ongoing wilderness evaluation and forest planning processes.

According to the U.S. Geological Survey (USGS), the contiguous United States contains 565 terrestrial, non-developed ecosystems. In this study, we analyzed representation of those ecosystems by comparing their areas in the NWPS with their areas on federal land at both the national and forest levels in order to calculate a percent representation:

Equation 1: *(area of ecosystem in the NWPS/area of ecosystem on federal land)*100²*

Equation 2: *(area of ecosystem in the NWPS on the GMUG NF/area of ecosystem on the GMUG NF)*100*

We conducted these calculations at the finest scale for which consistent, spatially-explicit vegetative land-cover data is available: the 6th level of the National Vegetation

² We used federal land, as opposed to all land, within the contiguous United States to better assess where ecosystems are under-represented on lands potentially available for wilderness designation.

Classification System (NVCS 2008).³ That data is from the USGS Gap Analysis Program (GAP) national land-cover data version 2 at 30-meter resolution (USGS 2011).

We obtained spatial data of the NWPS from the University of Montana College of Forestry and Conservation's Wilderness Institute at wilderness.net, which maintains the most up-to-date spatial data on wilderness areas. To map federal land area, we used the U.S. Protected Areas Database (PAD-US) version 1.3 (USGS 2012), which includes geographic boundaries, land ownership, land management, management designation, parcel name, area, and protection category.⁴

We overlaid the NWPS and all federal lands with land-cover data in a Geographic Information System (ArcGIS 10.2) to calculate and compare the total area of each ecosystem within the NWPS and federal land. We then calculated the percent of each ecosystem within the NWPS based on all area occurring on federal land (Equation 1, above).⁵ This was part of a national assessment that we conducted (Dietz *et al.* 2014 (*in revision*)).

We did the same calculations at the forest level. We extracted land-cover data and clipped it to the forest boundary, and then calculated the percent of each ecosystem within the GMUG's 10 existing wilderness areas based on all federal land area occurring on the Forest (Equation 2, above).

Next we classified representation for each scale into four classes (<5%, 5-9.9%, 10-19.9%, ≥20%) and mapped them across the entire national forest. We considered ecosystems with <19.9% of their total area in the NWPS as inadequately represented.

We then brought the Colorado Roadless Areas (CRAs) for the GMUG National Forest into Arc and created a new shapefile that included only the CRAs. This allowed us to focus our analysis on the areas that are potentially suitable for wilderness designation by tabulating the area of each ecosystem occurring within each CRA (see attached matrix, "Ecosystem Composition of Colorado Roadless Areas.xlsx"). Values within the matrix are the estimated acres of each ecosystem occurring within each CRA.

We used these data to calculate the proportion (%) of each CRA that is composed of ecosystems inadequately represented in the NWPS by each of the 3 lower

³ The NVCS classifications are as follows: 1) Class; 2) Subclass; 3) Formation; 4) Division; 5) Macrogroup; **6) Group (a.k.a. ecological system, to which we refer in this study as "ecosystem")**; 7) Alliance; and 8) Association.

⁴ The PAD-US is a national inventory of terrestrial and marine protected areas that are managed to preserve biological diversity and other natural, recreation, and cultural uses.

⁵ For example, when we say "boreal aspen-birch forest has 19% representation in NWPS," we mean that 19% of all federal land encompassing that ecosystem type is protected as wilderness in the NWPS.

representation classes (<5%, 5-9.9%, 10-19.9%) and for both scales of representation. For example, we calculated that 99% of Calamity Basin is in under-represented ecosystem types.

IV. Results

Our analysis shows that a majority of the CRAs contain high proportions of inadequately represented ecosystems at both the forest-level and national scales (Tables 1 & 2; Maps 2 & 3). Additionally, all of the CRAs contain at least one underrepresented ecosystem. Out of the 76 CRAs on the GMUG, over half of the units are mostly (>50%) composed of underrepresented ecosystems on both forest and federal levels. Additionally, over 550,000 acres of the 898,819 acres of CRAs on the forest are underrepresented on forest and federal levels.

In many instances, the addition of one CRA would elevate particular ecosystems into adequate representation (Table 4). For example, adding Kannah Creek CRA into the NWPS would elevate the Inter-Mountain Basins Mat Saltbush Shrubland into adequate representation (>20% representation). Even one of the more prevalent ecosystems on the GMUG, the Colorado Plateau Pinyon-Juniper Woodland, could achieve adequate representation with the addition of 3 CRAs (Kannah Creek, Sunnyside, and Kelso Mesa). In addition to these ecosystems, 7 others could achieve adequate representation on the forest level with the addition of one CRA.

More broadly, our analysis found that only 11 of the 47 ecosystem types found on the GMUG are adequately represented in wilderness on the forest level (Table 3, Tabs 1 & 2). The story is even more extreme on the federal level, with only 7 out of the 47 ecosystems showing adequate representation (Table 3, Tabs 1 & 3). Underrepresented ecosystems on the forest level cover over 58% (1,718,474 acres) of the GMUG, with federally underrepresented ecosystems spanning over 41% (742,213 acres) of the forests.

Notably, many under-represented ecosystem types on the GMUG are also some of the most common (Table 3, Tabs 2 & 3). The most prevalent ecosystem on the GMUG, the Rocky Mountain Aspen Forest and Woodland, covers over 17% (524,280 acres) of the GMUG but is underrepresented on the both forest and federal levels. Four other ecosystems span over 100,000 acres of the forest but are inadequately represented on forest and federal levels and include the Rocky Mountain Gambel Oak-Mixed Montane Shrubland, the Rocky Mountain Lodgepole Pine Forest, the Inter-Mountain Basins Montane Sagebrush Steppe, and the Colorado Plateau Pinyon-Juniper Woodland.

The attached maps and tables depict these results in detail, showing the following:

Map 1 “CO Roadless Units, GMUG National Forest”: Depicts each unit (polygon) in CRA inventory, outlined in black with hash marks, and with the forest boundary shaded green.

Map 2 “Ecosystem Representation on the Federal Level”: Color depiction of the results of Equation 1 (above), showing the level of representation in the NWPS of each ecosystem type at the national scale. For example, areas shown in red depict ecosystems that are represented in the NWPS at less than 5% of all available federal land. [CRAs outlined in black with cross-hatching]

Map 3 “Ecosystem Representation on the Forest Level”: Color depiction of the results of Equation 2 (above), showing the level of representation in the NWPS of each ecosystem type at the forest level. [CRAs outlined in black with cross-hatching]

Table 1, Tabs 1 & 2 “GMUG CRAs Representation”: Proportion (%) and acreage of each CRA composed of under-represented ecosystem types on the GMUG National Forest based on forest-level (Tab 1) or national-level (Tab 2) representation. Representation of each ecosystem type was quantified based on all available area on federal land and the individual forest. All ecosystems with <20% representation in the NWPS at each scale were broken into 3 levels of representation (<5%, 5-9.9%, and 10-19.9%). This table allows one to prioritize CRAs by proportion of land area as well as acreage that is composed of underrepresented ecosystems, at three levels.

Table 2 “Ecosystem Composition of Colorado Roadless Areas”: Values within the matrix are the estimated acres of each ecosystem type occurring within each CRA. This table depicts the specific ecosystem composition of each CRA.

Table 3, Tabs 1-3 “GMUG National Forest Ecosystems Representation”: These tables depict which ecosystems are under-represented at the forest-level and national scales. Tab 1 shows a complete list of ecosystem types found on the GMUG National Forest, and the proportion of each type in the NWPS at the forest-level and national scales. Tabs 2 and 3 show representation breakdowns at the three levels (<5%, 5-9.9%, and 10-19.9%) at the forest-level and national scales.

Table 4 “CRA Analysis of Ecosystem Composition”: This table shows the estimated acres of each ecosystem type occurring within each CRA unit. This table also shows how many acres of additional protection are needed to elevate a particular ecosystem into adequate representation, and how many units would be needed (if applicable) to achieve adequate representation on the forest level.

V. Recommendations

Sufficient ecosystem representation in the NWPS and other protected areas is crucial to achieving ecological integrity of the diverse plant and animal communities found in the GMUG. As described above and depicted in the attached maps and tables, our analysis shows that under-representation of ecosystems in the NWPS is a significant problem on the GMUG. Our analysis also shows that the vast majority of lands in the CRAs contain under-represented ecosystem types. Thus, the ongoing wilderness evaluation and planning process presents the Forest Service with a critical opportunity to prioritize protection of ecosystem diversity and begin to remedy the under-representation of numerous ecosystem types in the NWPS.

To that end, we urge the GMUG to use the representation information in the attached tables and maps and described above to evaluate the importance of each inventoried area in achieving diverse ecosystem representation in wilderness at the regional and national scales.⁶ In addition, the forest should use this information more broadly in its planning process and determinations whether to designate or recommend for designation other areas such as RNAs, ecological or botanical areas, etc. As described above, we believe that this information is the best available science on ecosystem representation, which the agency is legally required to use in its planning process.

If you have any questions about the analysis or data, or would like to have the data in another format, please contact Phil Hartger (phil_hartger@twc.org).

⁶ For example, Region 5 has made exceptional efforts to incorporate our analysis into the wilderness evaluation processes for the Inyo, Sequoia, and Sierra National Forests. The Region's wilderness team prepared a data summary for each inventoried unit, ranked by percent composition of under-represented ecosystems, to assess the relative opportunities in each unit to enhance ecosystem diversity. Those summaries are attached hereto.

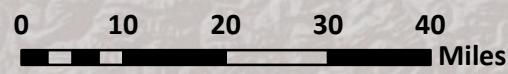
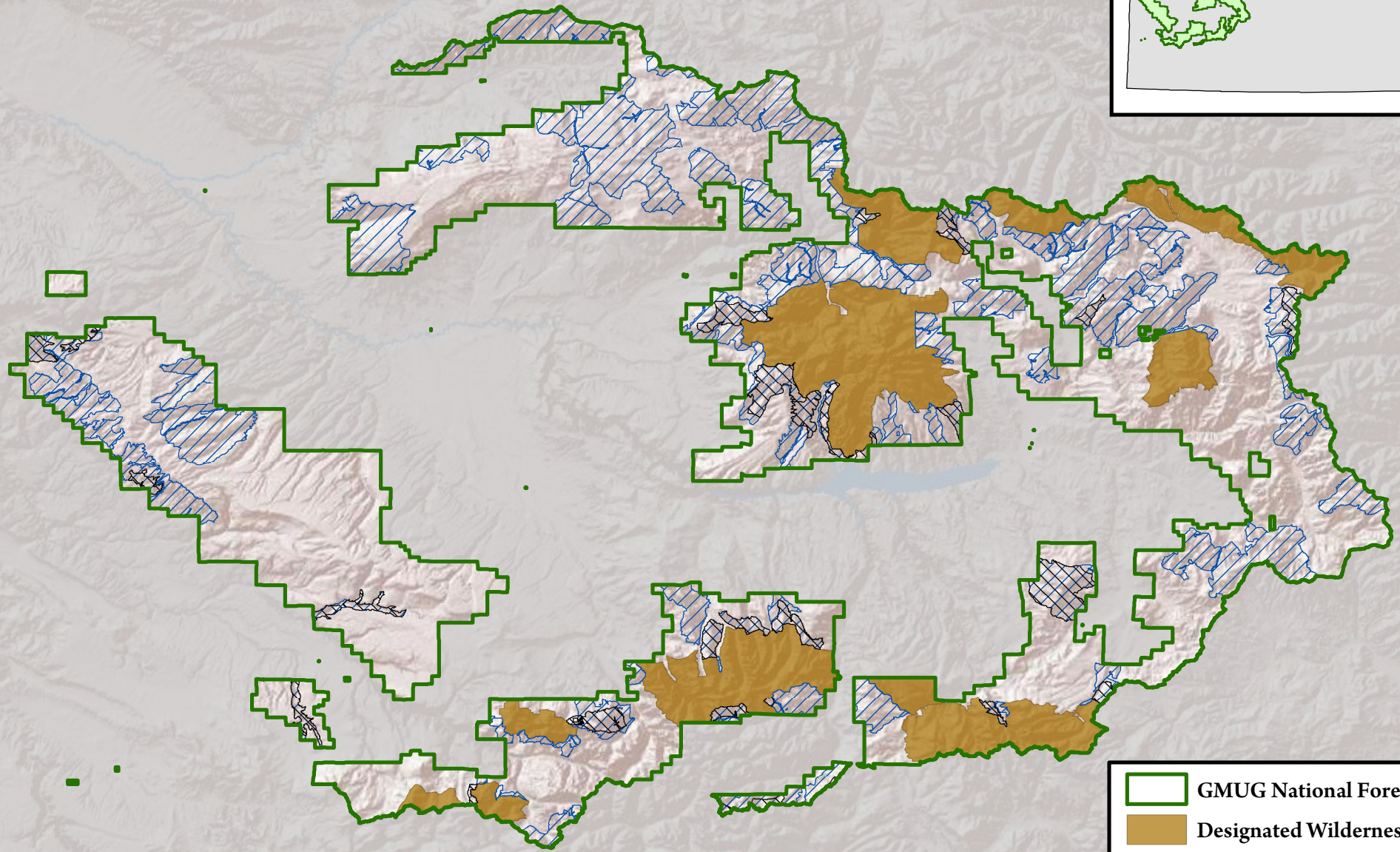
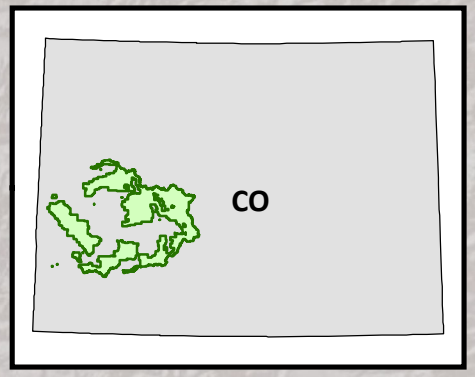
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

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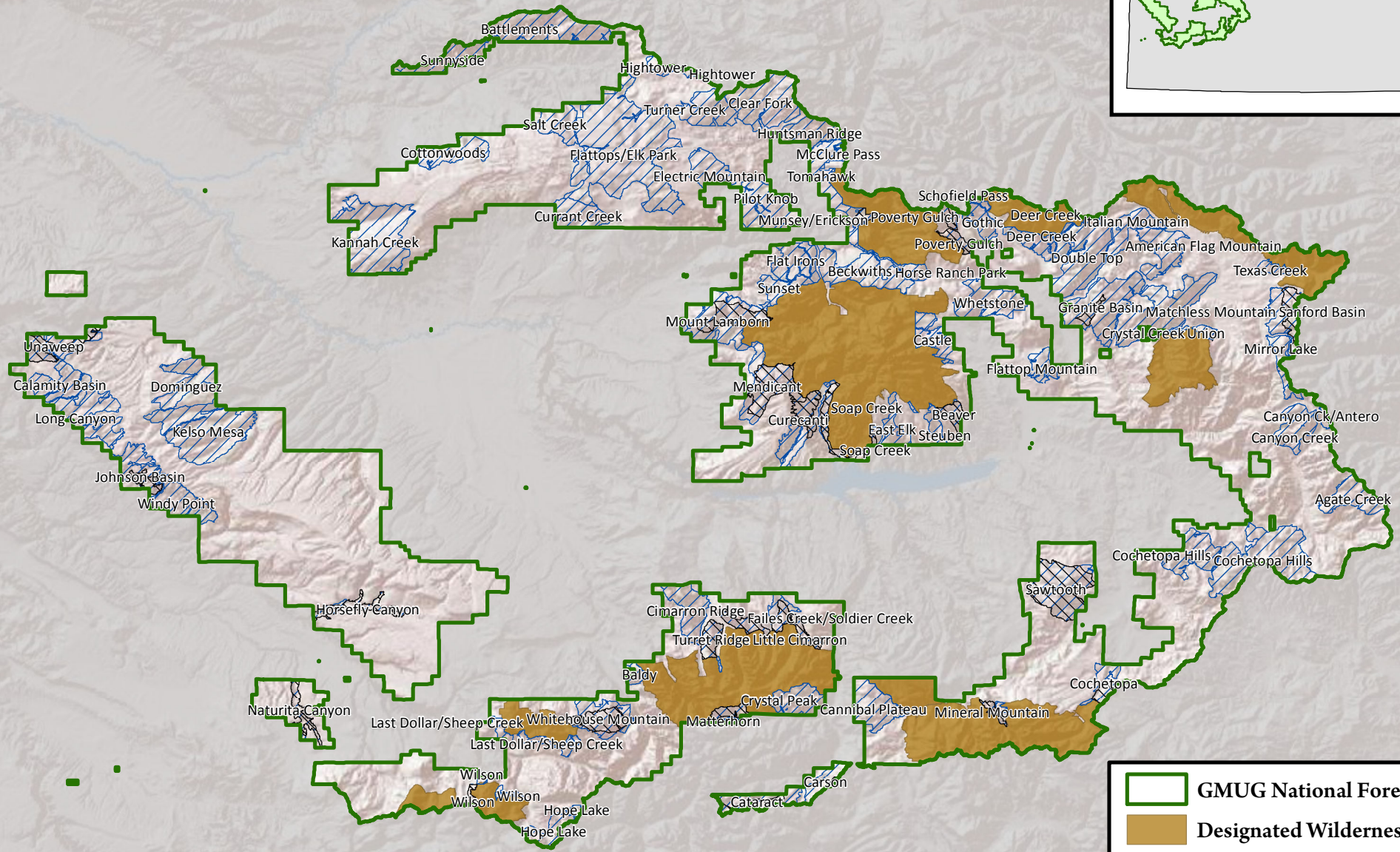
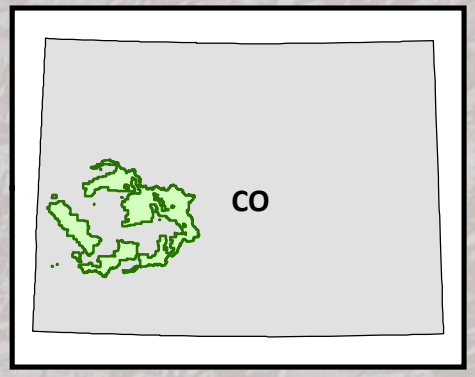
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MAP 1: COLORADO ROADLESS AREAS GMUG NATIONAL FORESTS

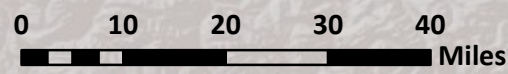


-  GMUG National Forests
-  Designated Wilderness
-  Colorado Roadless Areas, Upper Tier
-  Colorado Roadless Areas

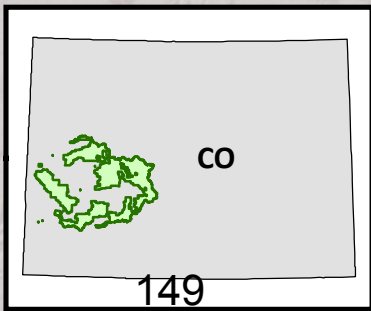
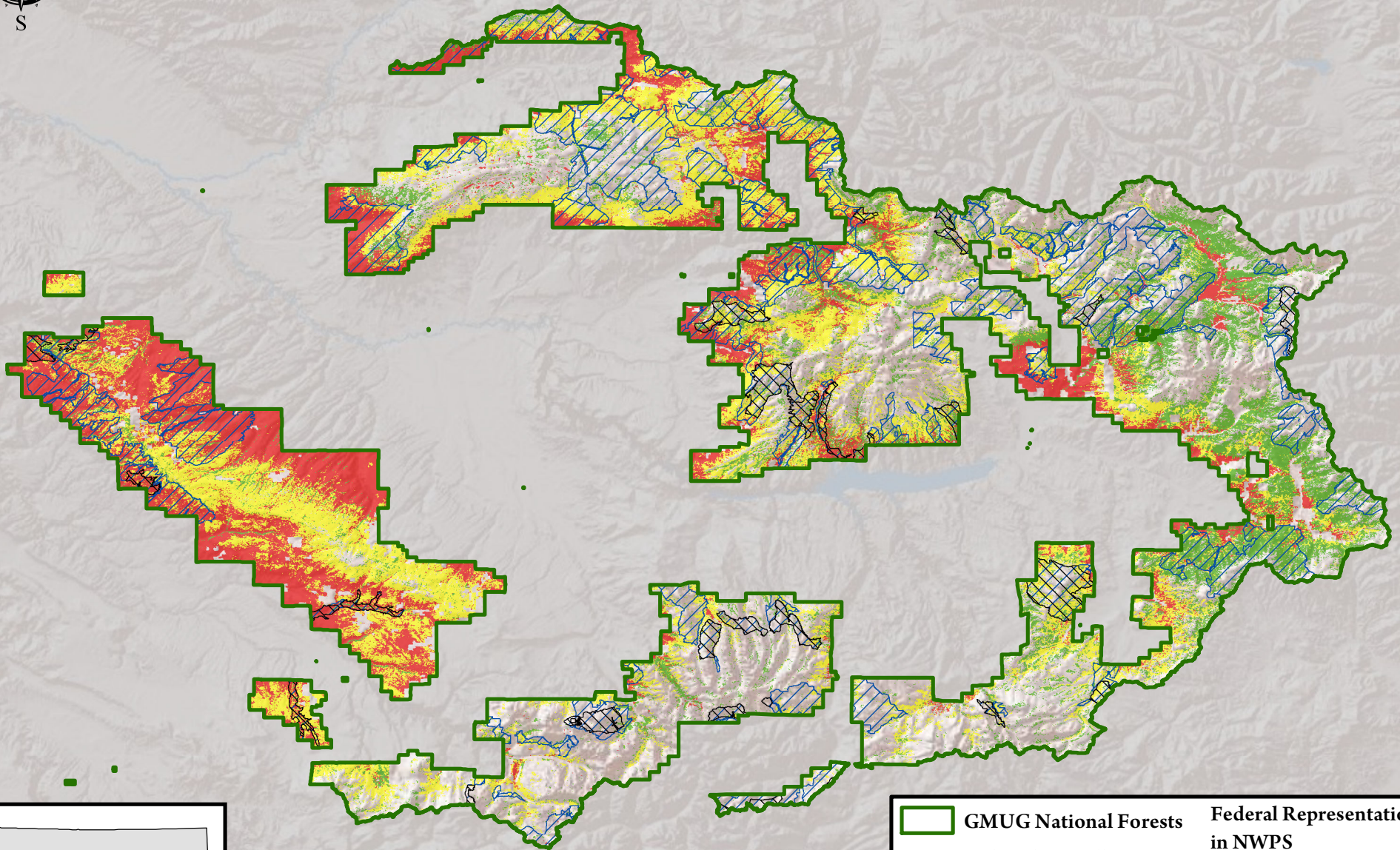
MAP 1: COLORADO ROADLESS AREAS GMUG NATIONAL FORESTS



	GMUG National Forests
	Designated Wilderness
	Colorado Roadless Areas, Upper Tier
	Colorado Roadless Areas



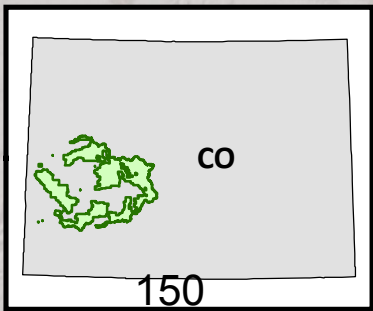
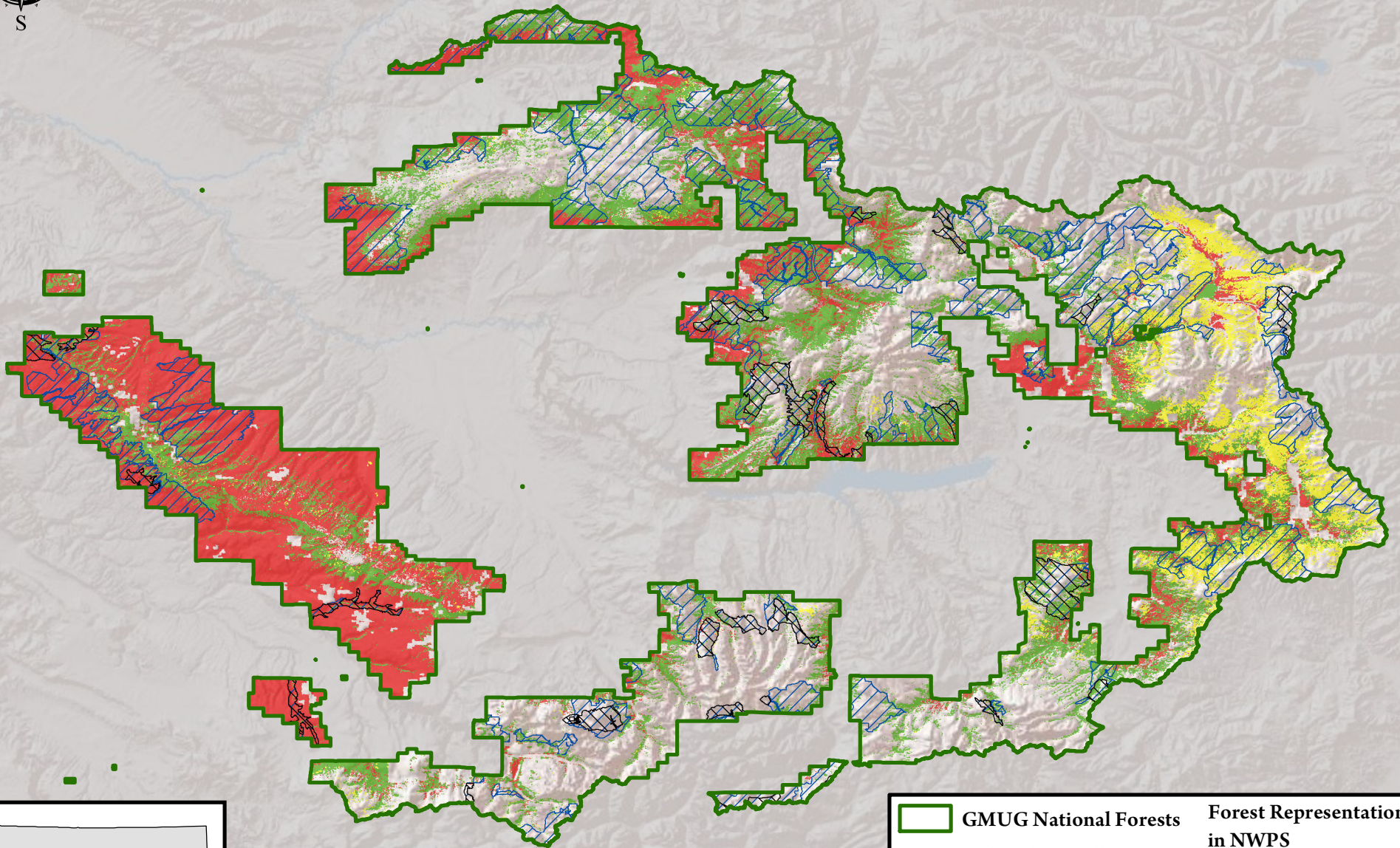
MAP 2: ECOSYSTEM REPRESENTATION ON THE FEDERAL LEVEL GMUG NATIONAL FORESTS



GMUG National Forests	Federal Representation in NWPS
Colorado Roadless Areas, Upper Tier	< 5%
Colorado Roadless Areas	5 - 9.9%
	10 - 20%
	> 20%

0 6 12 18 24
 Miles

MAP 3: ECOSYSTEM REPRESENTATION ON THE FOREST LEVEL GMUG NATIONAL FORESTS



GMUG National Forests	Forest Representation in NWPS
Colorado Roadless Areas, Upper Tier	
Colorado Roadless Areas	< 5%
	5 - 9.9%
	10 - 20%
	> 20%
0 6 12 18 24 Miles	

Table 1, Tab 1: GMUG National Forests, underrepresented Ecological Systems ("Ecosystems")

Colorado Roadless Unit	Forest Representation % Coverage				Forest Representation Acreage				
	< 5%	5 - 9.9%	10 - 19.9%	< 20%	< 5% (Acres)	5 - 9.9% (Acres)	10 - 19.9% (Acres)	< 20% (Acres)	Total Roadless Acreage
Agate Creek	0.5	34.4	5.0	39.8	54	4,065	592	4,710	11,832
Calamity Basin	92.2	0.0	7.4	99.5	11,478	0	916	12,394	12,451
Cannibal Plateau	0.3	0.1	13.5	13.9	49	8	1,963	2,020	14,497
Canyon Ck/Antero	0.0	0.2	10.0	10.1	0	2	159	162	1,595
Canyon Creek	0.5	24.2	4.6	29.3	53	2,611	496	3,160	10,797
Carson	0.7	0.0	5.7	6.5	43	2	341	386	5,966
Cataract	0.0	0.0	0.2	0.3	0	4	24	28	10,018
Cimarron Ridge	3.6	0.5	24.5	28.6	449	61	3,094	3,604	12,605
Cochetopa	2.6	1.5	52.9	57.1	173	101	3,504	3,778	6,622
Crystal Peak	0.0	0.1	18.8	18.9	3	7	2,169	2,178	11,513
Curecanti	16.2	0.2	42.9	59.4	2,011	28	5,315	7,354	12,378
Currant Creek	37.5	0.0	57.6	95.0	4,027	0	6,187	10,214	10,747
Deer Creek	2.8	0.8	64.3	67.9	264	72	6,068	6,404	9,437
Double Top	0.9	0.9	26.5	28.3	217	203	6,294	6,714	23,731
East Elk	10.5	0.6	46.3	57.4	630	36	2,784	3,450	6,010
Failes Creek/Soldier Creek	1.3	0.4	18.3	20.0	119	34	1,634	1,786	8,950
Gothic	0.2	0.6	19.1	19.9	12	36	1,103	1,151	5,772
Granite Basin	3.8	17.3	22.2	43.3	965	4,426	5,653	11,044	25,520
Hope Lake	0.0	0.5	2.3	2.8	0	38	189	227	8,127
Italian Mountain	0.0	6.3	4.4	10.7	0	558	395	953	8,914
Johnson Basin	71.1	0.0	28.4	99.6	8,473	0	3,388	11,861	11,911
Last Dollar/Sheep Creek	1.9	0.5	27.9	30.3	120	29	1,750	1,900	6,281
Little Cimarron	0.5	1.1	12.9	14.5	19	46	545	610	4,221
Matterhorn	0.0	0.3	7.9	8.2	0	9	279	288	3,533
Mendicant	11.6	0.2	38.9	50.6	2,211	42	7,422	9,674	19,102
Mirror Lake	0.0	2.1	3.1	5.3	0	128	187	316	6,004
Naturita Canyon	92.2	0.0	7.8	100.0	4,237	0	358	4,595	4,595
Pilot Knob	29.3	0.1	69.2	98.5	5,045	11	11,909	16,965	17,218
Salt Creek	5.6	0.0	60.4	66.0	508	1	5,428	5,937	8,993
Steuben	18.8	1.1	66.7	86.6	646	37	2,296	2,979	3,440

Sunnyside	84.2	0.0	2.1	86.3	8,966	3	220	9,189	10,648
Texas Creek	0.0	64.5	1.0	65.5	0	1,700	26	1,726	2,634
Battlements	26.6	0.2	49.7	76.5	6,485	58	12,139	18,682	24,421
Hightower	29.4	0.0	69.7	99.1	1,053	0	2,493	3,547	3,579
Kelso Mesa	79.7	0.0	20.3	99.9	28,248	0	7,185	35,433	35,458
Turret Ridge	5.0	1.8	6.3	13.0	271	98	343	712	5,460
Union	0.0	30.5	3.4	33.9	0	476	53	529	1,560
Whitehouse Mountain	1.2	0.3	6.5	8.0	164	42	922	1,128	14,164
Horsefly Canyon	82.6	0.0	17.4	100.0	5,141	0	1,083	6,224	6,224
Baldy	28.9	0.0	50.1	79.0	624	0	1,080	1,704	2,159
Wilson	12.4	0.1	17.8	30.2	326	2	467	794	2,627
Windy Point	80.9	0.0	19.0	99.9	10,295	0	2,424	12,719	12,727
Matchless Mountain	7.5	37.0	14.5	59.1	2,030	10,003	3,919	15,953	27,000
North Henson	0.0	0.2	0.3	0.5	0	1	2	3	596
Munsey/Erickson	27.6	0.0	68.4	96.0	970	0	2,401	3,371	3,512
Horse Ranch Park	3.2	0.0	73.0	76.1	123	0	2,834	2,957	3,884
Willow Creek	3.8	2.0	46.3	52.1	11	6	136	153	294
Mineral Mountain	1.8	0.3	38.7	40.8	43	6	912	962	2,355
Crystal Creek	2.6	49.2	13.2	65.1	14	262	70	346	532
Cottonwoods	29.1	0.1	51.0	80.2	3,259	12	5,725	8,996	11,219
Dominguez	95.6	0.0	4.0	99.6	11,965	0	494	12,459	12,513
Long Canyon	76.6	0.0	22.9	99.5	13,121	0	3,926	17,048	17,132
Schofield Pass	1.2	0.0	36.6	37.8	10	0	317	327	866
Beckwiths	16.9	0.1	43.8	60.7	3,119	10	8,058	11,187	18,417
Huntsman Ridge	19.5	0.4	68.0	88.0	2,063	46	7,191	9,301	10,574
Flattops/Elk Park	4.6	1.1	30.3	36.0	3,444	866	22,950	27,260	75,684
Flat Irons	47.6	0.3	51.9	99.8	5,468	32	5,965	11,465	11,494
Cochetopa Hills	7.1	41.9	22.4	71.4	3,428	20,320	10,861	34,609	48,464
Electric Mountain	14.2	0.1	62.2	76.5	1,384	9	6,050	7,443	9,732
Castle	5.1	0.1	39.2	44.5	483	6	3,684	4,172	9,386
Sunset	25.8	0.0	66.2	92.0	1,494	0	3,828	5,323	5,785
American Flag Mountain	0.0	22.6	3.6	26.2	3	2,665	419	3,086	11,788
Sawtooth	7.3	5.8	41.1	54.3	1,669	1,336	9,399	12,404	22,841
Poverty Gulch	2.2	1.1	16.1	19.3	117	59	866	1,042	5,391

Beaver	18.0	2.3	59.8	80.1	661	85	2,198	2,945	3,676
Soap Creek	44.4	0.0	40.4	84.8	3,581	1	3,254	6,837	8,062
Kannah Creek	60.1	0.0	26.2	86.4	20,727	12	9,040	29,780	34,484
Clear Fork	13.4	0.5	61.2	75.1	3,265	119	14,901	18,285	24,333
Whetstone	1.3	0.5	24.4	26.2	204	72	3,768	4,045	15,428
Mount Lamborn	39.7	0.1	37.1	76.8	8,926	12	8,338	17,276	22,500
Turner Creek	3.7	0.3	56.4	60.3	469	33	7,235	7,737	12,838
Unawep	68.7	0.0	28.1	96.8	8,338	0	3,413	11,750	12,135
Flattop Mountain	41.1	0.0	35.4	76.5	2,227	2	1,914	4,143	5,413
McClure Pass	38.7	0.0	41.2	79.9	132	0	140	272	340
Tomahawk	31.9	0.1	60.8	92.8	4,092	17	7,803	11,911	12,839
Sanford Basin	0.5	15.4	4.3	20.2	62	1,988	550	2,600	12,871

Table 1, Tab 2: GMUG National Forests, underrepresented Ecological Systems ("Ecosystems")

Colorado Roadless Unit	Federal Representation % Coverage				Federal Representation Acreage				
	< 5%	5 - 9.9%	10 - 19.9%	< 20%	< 5% (Acres)	5 - 9.9% (Acres)	10 - 19.9% (Acres)	< 20% (Acres)	Total Roadless Acreage
Agate Creek	0.1	1.1	38.7	39.9	10	135	4,575	4,721	11,832
Calamity Basin	87.2	11.3	1.1	99.5	10,858	1,404	132	12,394	12,451
Cannibal Plateau	0.2	12.5	3.9	16.6	32	1,809	567	2,408	14,497
Canyon Ck/Antero	0.0	0.1	10.7	10.8	0	1	171	172	1,595
Canyon Creek	0.4	1.1	29.0	30.5	43	119	3,136	3,298	10,797
Carson	0.0	6.5	2.8	9.2	0	386	165	551	5,966
Cataract	0.1	0.1	1.2	1.4	13	7	124	144	10,018
Cimarron Ridge	0.3	25.4	4.8	30.5	40	3,200	601	3,840	12,605
Cochetopa	0.8	43.9	11.5	56.2	54	2,905	760	3,719	6,622
Crystal Peak	0.0	18.3	3.3	21.7	4	2,112	381	2,497	11,513
Curecanti	14.7	32.3	15.5	62.6	1,823	4,001	1,922	7,746	12,378
Currant Creek	37.4	57.0	1.0	95.4	4,016	6,125	108	10,249	10,747
Deer Creek	2.6	47.6	22.1	72.3	245	4,495	2,082	6,822	9,437
Double Top	0.6	20.1	13.3	34.0	149	4,764	3,150	8,063	23,731
East Elk	8.0	24.0	29.7	61.7	481	1,441	1,784	3,706	6,010
Failes Creek/Soldier Creek	0.5	14.8	8.5	23.7	42	1,322	757	2,121	8,950
Gothic	0.2	12.8	20.3	33.3	12	738	1,172	1,922	5,772
Granite Basin	3.2	12.7	30.1	46.0	805	3,241	7,682	11,727	25,520
Hope Lake	0.7	1.7	2.9	5.3	59	135	234	427	8,127
Italian Mountain	0.1	2.1	9.6	11.7	6	183	855	1,045	8,914
Johnson Basin	60.8	31.8	7.0	99.6	7,242	3,786	834	11,862	11,911
Last Dollar/Sheep Creek	0.4	27.2	11.0	38.6	28	1,709	689	2,425	6,281
Little Cimarron	0.2	11.4	7.1	18.8	10	481	300	792	4,221
Matterhorn	0.0	7.3	6.3	13.6	0	257	222	479	3,533
Mendicant	8.3	38.7	9.9	56.9	1,579	7,385	1,898	10,862	19,102
Mirror Lake	0.4	0.5	4.5	5.5	26	29	273	328	6,004
Naturita Canyon	50.2	42.1	7.7	100.0	2,307	1,935	352	4,595	4,595
Pilot Knob	28.1	67.2	3.4	98.6	4,830	11,576	577	16,984	17,218
Salt Creek	2.5	59.1	5.5	67.1	225	5,313	497	6,035	8,993
Steuben	15.0	41.6	30.8	87.4	518	1,430	1,059	3,007	3,440

Sunnyside	84.1	0.5	15.4	100.0	8,955	55	1,637	10,648	10,648
Texas Creek	0.0	0.8	64.7	65.5	0	21	1,705	1,726	2,634
Battlements	26.0	42.9	11.7	80.6	6,348	10,474	2,856	19,679	24,421
Hightower	28.6	69.8	0.8	99.2	1,023	2,497	30	3,549	3,579
Kelso Mesa	72.3	23.5	4.1	99.9	25,648	8,317	1,468	35,433	35,458
Turret Ridge	0.2	11.6	3.2	15.0	10	636	173	819	5,460
Union	0.1	0.3	35.2	35.6	1	5	548	555	1,560
Whitehouse Mountain	0.3	5.2	4.7	10.2	49	734	661	1,444	14,164
Horsefly Canyon	71.8	12.9	15.3	100.0	4,469	802	953	6,224	6,224
Baldy	25.9	48.5	5.5	79.8	558	1,047	118	1,723	2,159
Wilson	0.2	29.9	0.7	30.7	4	785	17	807	2,627
Windy Point	70.6	26.1	3.3	99.9	8,982	3,318	419	12,719	12,727
Matchless Mountain	4.1	10.0	45.7	59.8	1,112	2,692	12,344	16,148	27,000
North Henson	0.0	0.5	0.0	0.5	0	3	0	3	596
Munsey/Erickson	25.7	52.0	19.4	97.1	902	1,827	683	3,412	3,512
Horse Ranch Park	2.3	73.0	5.5	80.7	89	2,835	213	3,136	3,884
Willow Creek	0.0	49.7	3.3	53.0	0	146	10	156	294
Mineral Mountain	0.0	31.9	7.2	39.1	0	751	169	920	2,355
Crystal Creek	0.0	2.6	64.1	66.7	0	14	341	355	532
Cottonwoods	21.6	53.1	5.7	80.4	2,427	5,961	636	9,024	11,219
Dominguez	93.2	4.9	1.9	100.0	11,660	616	238	12,513	12,513
Long Canyon	63.8	27.5	8.2	99.5	10,938	4,713	1,396	17,048	17,132
Schofield Pass	1.1	24.0	35.1	60.2	10	208	304	522	866
Beckwiths	14.9	35.9	15.2	66.0	2,748	6,610	2,794	12,153	18,417
Huntsman Ridge	18.9	61.9	11.9	92.8	2,002	6,547	1,262	9,810	10,574
Flattops/Elk Park	2.8	25.3	11.5	39.7	2,136	19,175	8,723	30,035	75,684
Flat Irons	44.0	28.5	27.3	99.8	5,053	3,280	3,138	11,471	11,494
Cochetopa Hills	3.3	9.4	59.2	71.8	1,581	4,544	28,681	34,806	48,464
Electric Mountain	5.1	67.4	4.7	77.2	498	6,557	455	7,510	9,732
Castle	0.5	37.3	8.4	46.1	44	3,501	784	4,328	9,386
Sunset	16.0	74.3	2.0	92.3	924	4,298	116	5,338	5,785
American Flag Mountain	0.1	0.9	26.1	27.1	17	101	3,073	3,190	11,788
Sawtooth	3.1	41.8	11.7	56.7	705	9,553	2,682	12,940	22,841
Poverty Gulch	2.2	9.3	20.4	31.8	118	499	1,100	1,717	5,391

Beaver	15.4	27.4	38.3	81.1	565	1,007	1,409	2,981	3,676
Soap Creek	41.5	25.7	21.6	88.8	3,346	2,076	1,740	7,162	8,062
Kannah Creek	58.6	23.5	10.1	92.1	20,200	8,091	3,482	31,773	34,484
Clear Fork	12.6	58.1	6.5	77.2	3,077	14,128	1,574	18,779	24,333
Whetstone	1.0	19.9	14.6	35.5	153	3,073	2,255	5,482	15,428
Mount Lamborn	37.9	33.2	12.3	83.3	8,522	7,470	2,757	18,749	22,500
Turner Creek	2.2	51.6	10.7	64.5	288	6,621	1,372	8,282	12,838
Unawep	56.5	20.5	20.8	97.8	6,852	2,491	2,527	11,869	12,135
Flattop Mountain	29.2	42.1	9.3	80.6	1,581	2,279	504	4,364	5,413
McClure Pass	0.0	79.2	0.7	79.9	0	270	2	272	340
Tomahawk	27.1	61.0	4.8	92.9	3,481	7,828	615	11,923	12,839
Sanford Basin	0.5	2.3	18.1	20.9	67	296	2,326	2,689	12,871

Table 2: Ecosystem Composition of Colorado Roadless Areas

Values are the estimated acres of each ecosystem occurring within each Wilderness Inventory Unit

Ecosystem	Colorado Roadless Areas								
	Agate Creek	Calamity Basin	Cannibal Plateau	Canyon Ck/Antero	Canyon Creek	Carson	Cataract	Cimarron Ridge	Cochetopa
Inter-Mountain Basins Aspen-Mixed Conifer Forest and Woodland	23	151	18	0	1	43	0	417	27
Rocky Mountain Aspen Forest and Woodland	70	784	1,401	1	52	334	3	2,639	1,760
Rocky Mountain Lodgepole Pine Forest	4,060	0	0	2	2,600	0	0	12	101
Rocky Mountain Subalpine Dry-Mesic Spruce-Fir Forest and Woodland	3,416	6	4,040	263	2,671	1,492	429	4,504	1,679
Rocky Mountain Subalpine Mesic Spruce-Fir Forest and Woodland	2,749	51	2,848	17	2,052	2,180	774	4,061	622
Rocky Mountain Subalpine-Montane Limber-Bristlecone Pine Woodland	6	0	0	0	74	0	0	0	254
Southern Rocky Mountain Dry-Mesic Montane Mixed Conifer Forest and Woodland	115	33	0	0	12	0	0	89	84
Southern Rocky Mountain Mesic Montane Mixed Conifer Forest and Woodland	38	82	0	0	0	0	0	92	80
Southern Rocky Mountain Ponderosa Pine Woodland	22	469	2	0	11	0	0	0	94
Colorado Plateau Pinyon-Juniper Woodland	0	4,447	0	0	0	0	0	0	0
Southern Rocky Mountain Pinyon-Juniper Woodland	0	0	0	0	0	0	0	0	0
Rocky Mountain Lower Montane Riparian Woodland and Shrubland	0	0	0	0	0	0	0	0	0
Rocky Mountain Subalpine-Montane Riparian Woodland	4	0	0	0	0	0	0	0	0
Southern Rocky Mountain Montane-Subalpine Grassland	19	0	380	0	44	7	0	94	1,024
Rocky Mountain Gambel Oak-Mixed Montane Shrubland	4	5,258	0	0	0	0	0	13	0
Rocky Mountain Lower Montane-Foothill Shrubland	0	194	0	0	0	0	0	0	0
Rocky Mountain Subalpine-Montane Mesic Meadow	344	17	179	159	314	0	8	172	301
Rocky Mountain Alpine-Montane Wet Meadow	4	0	26	3	2	19	103	77	47
Rocky Mountain Subalpine-Montane Riparian Shrubland	333	0	2,140	123	695	516	1,772	56	348
North American Arid West Emergent Marsh	0	2	0	0	0	0	0	0	0
Inter-Mountain Basins Mat Saltbush Shrubland	0	0	0	0	0	0	0	0	0
Inter-Mountain Basins Mixed Salt Desert Scrub	0	0	0	0	0	0	0	0	0
Inter-Mountain Basins Big Sagebrush Shrubland	0	58	0	0	0	0	0	0	0
Inter-Mountain Basins Montane Sagebrush Steppe	4	719	28	0	40	0	0	19	53
Wyoming Basins Dwarf Sagebrush Shrubland and Steppe	0	0	0	0	0	0	0	0	0
Inter-Mountain Basins Semi-Desert Grassland	0	0	0	0	0	0	0	0	0
Inter-Mountain Basins Semi-Desert Shrub Steppe	0	0	0	0	0	0	0	0	0
Rocky Mountain Alpine Fell-Field	205	0	415	94	202	367	809	28	0
Rocky Mountain Alpine Turf	180	0	1,874	168	848	211	4,121	0	0
Rocky Mountain Cliff, Canyon and Massive Bedrock	10	0	362	7	208	146	14	159	148
Colorado Plateau Mixed Bedrock Canyon and Tableland	0	0	0	0	0	0	0	0	0
Inter-Mountain Basins Active and Stabilized Dune	0	0	0	0	0	0	0	0	0
Inter-Mountain Basins Shale Badland	0	0	0	0	0	0	0	0	0
Rocky Mountain Alpine Bedrock and Scree	221	0	773	759	957	650	1,968	116	0
Cultivated Cropland	0	171	0	0	0	0	0	0	0
Introduced Upland Vegetation - Perennial Grassland and Forbland	0	8	0	0	0	0	0	0	0
Recently Logged Areas	1	0	8	0	11	2	4	49	0
Recently Burned	0	0	0	0	0	0	0	0	0
Disturbed/Successional - Recently Chained Pinyon-Juniper	0	0	0	0	0	0	0	0	0
Open Water (Fresh)	0	0	3	0	0	0	13	8	1
Quarries, Mines, Gravel Pits and Oil Wells	2	0	0	0	2	0	0	0	0
Developed, Low Intensity	0	0	0	0	0	0	0	0	0
Developed, High Intensity	0	0	0	0	0	0	0	0	0

Crystal Peak	Curecanti	Currant Creek	Deer Creek	Double Top	East Elk	Failes Creek/Soldier Creek	Gothic	Granite Basin	Hope Lake	Italian Mountain	Johnson Basin	Last Dollar/Sheep Creek	Little Cimarron	Matterhorn
3	131	11	21	68	46	75	1	27	0	0	323	98	19	0
1,992	3,301	6,093	2,796	3,755	1,148	1,017	578	2,350	96	82	2,555	1,204	445	235
0	13	0	42	34	27	24	0	4,333	0	539	0	4	45	0
2,550	1,885	449	1,448	6,379	1,302	3,181	929	5,802	931	1,894	3	1,815	1,770	325
2,082	2,616	12	723	4,785	972	3,431	1,222	6,237	1,457	1,919	47	606	1,346	274
0	0	0	0	0	0	0	0	93	0	0	0	0	0	0
12	869	5	14	26	965	83	0	901	0	0	248	7	59	0
3	525	0	5	9	454	95	0	413	0	0	514	1	1	0
0	61	0	0	0	107	3	0	130	0	0	907	1	0	0
0	4	0	0	0	21	0	0	3	0	0	1,269	0	0	0
0	0	0	0	0	0	0	0	5	0	0	0	0	0	0
0	0	0	0	0	0	0	0	0	0	0	3	0	0	0
0	0	0	0	0	0	0	0	2	0	0	0	0	0	0
110	492	21	1,647	772	132	218	123	636	1	82	0	380	16	13
0	398	3,902	0	0	3	3	0	4	0	0	5,611	2	0	0
0	0	1	0	0	0	0	0	0	0	0	112	0	0	0
48	126	68	1,604	1,732	84	221	401	1,256	33	231	70	153	14	31
93	49	32	376	1,210	24	266	514	504	35	49	0	60	14	118
626	131	37	286	2,193	30	175	739	725	702	1,278	0	141	50	180
0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
0	0	0	0	0	0	0	0	0	0	0	2	0	0	0
0	1,416	111	241	149	453	28	11	789	0	0	140	16	0	0
0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
0	0	0	0	0	0	6	0	0	0	0	0	0	0	0
143	0	0	2	120	1	6	63	64	345	150	0	38	40	46
2,510	0	0	111	1,525	0	25	155	362	622	1,275	0	250	64	1,404
226	339	3	42	139	230	68	258	273	165	36	1	464	167	72
0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
1,106	0	0	44	665	0	12	742	510	3,643	1,354	0	1,005	159	825
0	0	1	1	0	0	0	0	0	0	0	107	3	0	0
0	0	0	1	0	0	5	0	0	0	0	0	0	0	0
7	15	0	30	169	9	10	36	91	38	19	0	26	1	9
0	0	0	0	0	0	0	0	7	0	0	0	0	0	0
0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
4	2	0	2	0	2	0	2	4	59	0	0	6	10	0
0	0	0	0	0	0	0	0	0	0	6	0	0	0	0
0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
0	4	0	0	0	2	0	0	0	0	0	0	1	0	0

Mendicant	Mirror Lake	Naturita Canyon	Pilot Knob	Salt Creek	Steuben	Sunnyside	Texas Creek	Battlements	Hightower	Kelso Mesa	Turret Ridge	Union	Whitehouse Mountain	Horsefly Canyon	Baldy	Wilson
684	0	0	207	283	38	2	0	140	31	462	271	0	119	3	38	322
6,179	22	6	11,353	4,891	1,251	37	18	8,983	2,440	5,682	237	3	485	130	756	458
2	124	0	0	0	28	0	1,700	0	0	0	0	476	2	0	0	0
3,732	1,289	0	15	1,871	250	0	702	3,028	8	1	2,465	166	2,717	0	170	503
3,596	1,138	0	68	928	174	0	174	1,258	18	24	1,920	808	4,387	0	264	773
0	8	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
104	0	157	145	20	594	85	0	38	0	242	19	1	98	250	12	0
140	0	196	399	23	389	88	0	8	0	1,212	18	1	200	703	7	0
4	0	1,930	10	0	90	8	0	2	0	1,846	0	0	26	669	27	0
4	0	1,792	36	0	14	6,236	0	8	0	7,343	0	0	0	1,315	77	0
0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
0	0	3	8	0	0	0	0	0	0	25	0	0	0	91	0	0
0	0	0	11	0	0	3	0	0	0	0	0	0	0	0	0	0
477	3	0	6	138	40	8	3	1,291	26	34	30	2	63	0	225	4
731	0	367	2,769	213	24	672	0	4,747	381	14,342	0	0	15	2,721	423	0
0	0	0	1	0	0	25	0	12	0	1,400	0	0	0	18	0	0
473	129	0	4	356	20	3	4	1,816	28	14	29	44	48	0	80	4
561	1	0	2	98	18	1	0	475	2	0	0	5	95	0	2	8
628	777	0	151	158	10	0	32	231	4	0	26	16	160	0	2	33
0	0	0	0	0	0	2	0	0	0	3	0	0	0	0	0	0
0	0	0	0	0	0	15	0	0	0	0	0	0	0	0	0	0
0	0	0	0	0	0	566	0	0	0	0	0	0	0	0	0	0
0	0	0	0	0	2	66	0	0	0	66	0	0	0	0	0	0
776	0	30	1,998	12	477	186	0	1,547	641	2,152	0	0	3	7	41	0
0	0	0	0	0	0	0	0	0	0	3	0	0	0	0	0	0
0	0	0	0	0	0	2	0	0	0	0	0	0	0	0	0	0
0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
29	340	0	0	0	0	0	0	226	0	0	2	0	142	0	0	6
10	1,442	0	0	0	0	0	0	0	0	0	3	12	628	0	0	14
618	19	0	17	0	9	1,458	0	519	0	0	107	21	218	0	17	4
0	0	0	0	0	0	671	0	0	0	1	0	0	0	0	0	0
1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
0	0	0	0	0	0	220	0	0	0	0	0	0	0	0	0	0
244	681	0	0	0	0	0	0	0	0	0	224	2	4,685	0	0	491
11	0	115	16	0	0	48	0	28	1	252	0	0	0	251	18	4
0	0	0	0	0	0	0	0	1	0	0	0	0	0	0	0	0
40	4	0	0	1	10	0	0	58	0	0	98	0	40	0	0	2
0	0	0	0	0	0	1	0	0	0	292	0	0	0	0	0	0
0	0	0	0	0	0	209	0	0	0	62	0	0	0	67	0	0
49	26	0	3	0	0	0	0	2	0	0	10	1	28	0	0	0
2	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
0	0	0	0	0	0	37	0	0	0	0	0	0	0	0	0	0
6	0	0	0	0	0	0	0	3	0	0	0	0	3	0	0	0

Windy Point	Matchless Mountain	North Henson	Munsey/Erickson	Horse Ranch Park	Willow Creek	Mineral Mountain	Crystal Creek	Cottonwoods	Dominguez	Long Canyon	Schofield Pass	Beckwiths	Huntsman
28	52	0	62	34	11	43	0	832	0	170	1	367	61
1,990	1,266	2	1,756	2,795	135	628	0	5,067	291	2,529	169	6,162	6,327
0	9,826	0	0	0	6	1	262	0	0	0	0	3	0
1	4,198	29	67	475	138	405	48	846	0	22	106	1,660	614
6	3,966	554	33	119	0	884	128	1,211	0	63	6	2,891	89
0	137	0	0	0	0	70	0	0	0	0	0	0	0
73	1,012	0	383	12	1	31	31	59	45	424	0	767	35
67	256	0	258	7	0	83	39	149	139	956	0	747	26
1,285	869	0	6	0	0	0	14	3	305	2,013	0	40	0
2,346	0	0	45	0	0	0	0	18	5,206	2,882	0	73	0
0	20	0	0	0	0	0	0	0	0	0	0	0	0
0	0	0	10	0	0	0	0	0	5	16	0	0	0
0	14	0	0	0	0	0	0	12	0	0	0	0	4
14	341	0	4	5	0	75	0	60	20	1	38	35	117
6,389	30	0	755	70	0	0	0	2,193	4,547	6,685	0	1,875	1,862
82	0	0	0	0	0	0	0	0	65	223	0	0	0
280	907	0	1	16	0	26	0	388	0	16	110	321	686
0	160	0	16	60	3	16	0	18	0	0	191	115	498
0	988	1	1	110	0	65	1	138	0	0	158	446	60
0	0	0	0	0	0	0	0	0	0	0	0	0	0
0	0	0	0	0	0	0	0	0	0	0	0	0	0
0	0	0	0	0	0	0	0	0	0	0	0	0	0
4	0	0	25	0	0	0	0	0	54	4	0	0	0
85	1,052	0	66	18	0	0	0	210	1,704	955	10	762	126
0	0	0	0	0	0	0	0	0	2	0	0	0	0
0	0	0	0	0	0	0	0	0	0	0	0	0	0
0	0	0	0	0	0	0	0	0	0	0	0	0	0
0	0	1	0	5	0	0	0	0	0	0	8	26	0
0	854	0	0	1	0	2	0	0	0	0	4	5	0
0	169	0	24	119	0	13	9	10	54	0	3	843	12
0	0	0	0	0	0	0	0	0	0	0	0	0	0
0	0	0	0	0	0	0	0	0	0	0	0	0	0
0	0	0	0	0	0	0	0	0	0	0	0	0	0
0	709	8	0	38	0	10	0	0	0	0	63	1,236	0
74	7	0	2	1	0	0	0	3	34	172	0	2	14
0	1	0	0	0	0	0	0	0	0	0	0	0	0
0	164	1	0	0	0	5	0	0	0	0	0	7	41
0	0	0	0	0	0	0	0	0	0	0	0	0	0
0	0	0	0	0	0	0	0	0	42	1	0	0	0
0	0	0	0	0	0	0	0	2	0	0	0	28	0
0	3	0	0	0	0	0	0	0	0	0	0	0	0
3	0	0	0	0	0	0	0	0	0	0	0	0	0
0	0	0	0	0	0	0	0	0	0	0	0	9	0

Flattops/Elk Park	Flat Irons	Cochetopa Hills	Electric Mountain	Castle	Sunset	American Flag Mountain	Sawtooth	Poverty Gulch	Beaver	Soap Creek	Kannah Creek	Clear Fork	Whetstone	Mount Lamborn
1,354	193	618	886	445	570	0	498	0	53	97	542	189	68	435
15,949	2,865	1,801	5,651	2,866	3,728	36	7,604	379	888	1,650	6,634	13,455	2,620	6,666
0	0	20,253	9	6	0	2,637	1,165	3	85	1	4	0	47	3
32,726	8	6,042	813	2,919	264	3,615	4,581	186	273	302	2,059	3,110	3,717	1,159
10,902	14	6,567	1,345	1,901	165	3,496	4,333	959	409	510	538	1,404	3,825	2,056
0	0	307	0	0	0	3	57	0	0	0	0	0	0	0
57	890	3,711	137	78	65	0	397	15	618	992	315	116	112	536
18	2,209	4,074	209	14	33	0	258	6	659	401	79	171	85	524
1	222	1,237	0	0	0	0	466	0	43	144	10	0	0	81
2	55	0	0	0	0	0	0	0	4	145	10,364	6	0	1,155
0	0	94	0	0	0	0	0	0	0	2	0	0	0	0
0	3	1	0	0	0	0	0	0	0	14	51	2	0	0
0	32	55	0	0	0	1	1	2	0	0	2	0	0	2
1,005	0	876	20	190	0	38	815	67	23	185	899	365	361	281
1,331	4,651	64	409	7	846	0	0	5	4	527	6,691	2,636	3	4,639
2	1	0	0	0	0	0	0	0	0	11	13	0	0	129
5,874	0	86	32	530	2	331	268	399	10	22	1,090	793	574	251
2,254	0	262	57	135	0	72	528	529	6	13	83	415	180	259
1,403	0	319	63	236	18	818	701	1,278	13	88	114	991	273	400
0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
0	0	0	0	0	0	0	0	0	0	0	33	0	0	0
0	0	0	0	0	0	0	0	0	0	0	127	0	0	51
0	0	0	0	0	0	0	0	0	1	38	21	0	0	50
653	341	1,389	60	28	75	3	689	112	556	2,591	2,739	420	134	2,151
0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
0	0	0	0	0	0	0	0	0	0	0	0	0	0	5
0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
613	0	0	0	0	0	11	113	103	0	0	0	7	74	11
0	0	155	0	2	0	325	59	137	0	0	0	10	271	1
520	6	242	10	20	15	32	64	146	30	311	1,910	79	1,257	1,182
0	0	0	0	0	0	0	0	0	0	0	107	0	0	24
0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
5	0	268	0	0	0	330	58	1,012	0	0	0	32	1,786	124
88	2	26	30	3	3	0	15	0	0	13	9	14	0	112
4	0	0	0	0	0	0	0	0	0	0	0	0	0	29
866	0	12	0	0	0	26	169	54	0	0	7	119	25	8
0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
0	0	0	0	0	0	0	0	0	0	0	1	0	0	65
48	0	7	0	6	0	10	0	0	0	4	24	0	16	79
0	0	0	0	0	0	4	0	0	0	0	0	0	0	0
10	0	0	0	0	0	0	0	0	0	0	20	0	0	0
0	0	0	0	0	0	0	0	0	0	1	0	0	0	32

Turner Creek	UnawEEP	Flattop Mountain	McClure Pass	Tomahawk	Sanford Basin
181	954	625	132	619	0
6,121	1,001	1,631	138	7,198	271
0	0	0	0	16	1,988
2,792	21	642	12	519	3,597
1,662	244	408	56	346	2,350
0	0	0	0	0	15
37	320	1	2	373	0
15	1,290	3	0	208	0
0	532	21	0	8	0
0	626	0	0	17	0
0	0	0	0	0	0
0	35	0	0	0	0
0	0	0	0	1	0
286	4	0	0	2	25
121	5,170	10	0	2,689	0
0	329	0	0	1	0
776	799	280	0	5	234
219	0	0	0	0	17
100	0	0	0	50	1,220
0	0	0	0	0	0
0	0	0	0	0	0
0	0	0	0	0	0
0	48	0	0	0	0
165	628	1,566	0	741	62
0	0	0	0	0	0
0	0	0	0	0	0
0	0	0	0	0	0
0	0	0	0	0	699
0	0	0	0	0	1,195
326	119	220	0	12	87
0	0	0	0	0	0
0	0	0	0	0	0
0	0	0	0	0	0
2	0	0	0	0	1,104
2	15	4	0	17	0
1	0	1	0	0	0
33	0	2	0	0	0
0	0	0	0	0	0
0	0	0	0	0	0
0	0	0	0	16	5
0	0	0	0	0	0
0	0	0	0	0	0
0	0	0	0	0	0

Table 3, Tab 1: GMUG National Forest Ecosystem Representation

Ecological Group ("Ecosystem")	GMUG Wilderness (Acres)	GMUG Non-Wilderness (Acres)	All GMUG (Acres)	% GMUG Wilderness	% Federal Wilderness
Inter-Mountain Basins Active and Stabilized Dune	12	1	13	91.2	2.3
Rocky Mountain Alpine Bedrock and Scree	71,844	46,653	118,496	60.6	54.2
Rocky Mountain Alpine Fell-Field	12,331	8,699	21,030	58.6	61.8
Rocky Mountain Alpine Turf	45,780	34,085	79,865	57.3	58.5
Rocky Mountain Cliff, Canyon and Massive Bedrock	19,710	23,199	42,909	45.9	19.5
Rocky Mountain Alpine-Montane Wet Meadow	17,010	22,803	39,814	42.7	19.8
Developed, High Intensity	58	105	162	35.5	0.1
Rocky Mountain Subalpine-Montane Riparian Shrubland	31,494	57,398	88,892	35.4	32.4
Quarries, Mines, Gravel Pits and Oil Wells	23	50	73	31.2	0.5
Rocky Mountain Subalpine Mesic Spruce-Fir Forest and Woodland	98,213	228,148	326,361	30.1	31.3
Rocky Mountain Subalpine Dry-Mesic Spruce-Fir Forest and Woodland	117,838	353,529	471,367	25.0	32.4
Rocky Mountain Subalpine-Montane Limber-Bristlecone Pine Woodland	977	4,920	5,897	16.6	29.4
Southern Rocky Mountain Montane-Subalpine Grassland	8,560	49,212	57,772	14.8	7.8
Open Water (Fresh)	1,069	6,235	7,303	14.6	4.1
Southern Rocky Mountain Dry-Mesic Montane Mixed Conifer Forest and Woodland	7,018	47,288	54,306	12.9	11.7
Rocky Mountain Aspen Forest and Woodland	67,689	456,591	524,280	12.9	9.5
Rocky Mountain Subalpine-Montane Mesic Meadow	10,210	70,785	80,995	12.6	18.1
Southern Rocky Mountain Mesic Montane Mixed Conifer Forest and Woodland	6,188	44,906	51,094	12.1	11.5
Rocky Mountain Lodgepole Pine Forest	12,747	162,104	174,850	7.3	12.5
Recently Logged Areas	945	15,661	16,605	5.7	6.6
Rocky Mountain Subalpine-Montane Riparian Woodland	31	588	619	5.0	14.9
Inter-Mountain Basins Montane Sagebrush Steppe	8,053	162,660	170,712	4.7	4.9
Inter-Mountain Basins Aspen-Mixed Conifer Forest and Woodland	3,831	88,186	92,017	4.2	6.1
Rocky Mountain Gambel Oak-Mixed Montane Shrubland	10,433	269,075	279,508	3.7	2.2
Rocky Mountain Lower Montane Riparian Woodland and Shrubland	32	1,055	1,088	2.9	2.4
Inter-Mountain Basins Big Sagebrush Shrubland	101	6,397	6,499	1.6	2.1
Introduced Upland Vegetation - Perennial Grassland and Forbland	4	267	270	1.4	0.7
Southern Rocky Mountain Ponderosa Pine Woodland	831	97,097	97,928	0.8	8.3
Colorado Plateau Pinyon-Juniper Woodland	743	103,591	104,334	0.7	3.3

Cultivated Cropland	98	18,805	18,903	0.5	0.0
Rocky Mountain Lower Montane-Foothill Shrubland	7	5,865	5,872	0.1	0.9
Colorado Plateau Pinyon-Juniper Shrubland	0	111	111	0.0	1.6
Southern Rocky Mountain Pinyon-Juniper Woodland	0	435	435	0.0	4.0
North American Arid West Emergent Marsh	0	24	24	0.0	2.8
Inter-Mountain Basins Greasewood Flat	0	7	7	0.0	2.0
Inter-Mountain Basins Mat Saltbush Shrubland	0	50	50	0.0	0.0
Inter-Mountain Basins Mixed Salt Desert Scrub	0	1,153	1,153	0.0	1.4
Wyoming Basins Dwarf Sagebrush Shrubland and Steppe	0	22	22	0.0	0.2
Inter-Mountain Basins Semi-Desert Grassland	0	16	16	0.0	4.4
Inter-Mountain Basins Semi-Desert Shrub Steppe	0	7	7	0.0	2.0
Colorado Plateau Mixed Bedrock Canyon and Tableland	0	955	955	0.0	4.5
Inter-Mountain Basins Shale Badland	0	226	226	0.0	4.0
Undifferentiated Barren Land	0	8	8	0.0	1.9
Introduced Upland Vegetation - Annual Grassland	0	123	123	0.0	0.7
Recently Burned	0	1,988	1,988	0.0	8.0
Disturbed/Successional - Recently Chained Pinyon-Juniper	0	7,295	7,295	0.0	0.6
Developed, Low Intensity	0	124	124	0.0	0.1
Total	553,877	2,385,960	2,939,836	18.8	7.6

Table 3, Tab 2: GMUG National Forest Ecosystem Representation at the Forest Scale

Ecological Group ("Ecosystem")	GMUG Wilderness (Acres)	GMUG Non-Wilderness (Acres)	All GMUG (Acres)	% GMUG Wilderness	% Coverage, GMUG Forest Area
Representation @ < 20%					
Rocky Mountain Subalpine-Montane Limber-Bristlecone Pine Woodland	977	4,920	5,897	16.6	0.2
Southern Rocky Mountain Montane-Subalpine Grassland	8,560	49,212	57,772	14.8	2.0
Open Water (Fresh)	1,069	6,235	7,303	14.6	0.2
Southern Rocky Mountain Dry-Mesic Montane Mixed Conifer Forest and Woodland	7,018	47,288	54,306	12.9	1.8
Rocky Mountain Aspen Forest and Woodland	67,689	456,591	524,280	12.9	17.8
Rocky Mountain Subalpine-Montane Mesic Meadow	10,210	70,785	80,995	12.6	2.7
Southern Rocky Mountain Mesic Montane Mixed Conifer Forest and Woodland	6,188	44,906	51,094	12.1	1.7
Rocky Mountain Lodgepole Pine Forest	12,747	162,104	174,850	7.3	5.9
Rocky Mountain Subalpine-Montane Riparian Woodland	31	588	619	5.0	0.0
Inter-Mountain Basins Montane Sagebrush Steppe	8,053	162,660	170,712	4.7	5.8
Inter-Mountain Basins Aspen-Mixed Conifer Forest and Woodland	3,831	88,186	92,017	4.2	3.1
Rocky Mountain Gambel Oak-Mixed Montane Shrubland	10,433	269,075	279,508	3.7	9.5
Rocky Mountain Lower Montane Riparian Woodland and Shrubland	32	1,055	1,088	2.9	0.0
Inter-Mountain Basins Big Sagebrush Shrubland	101	6,397	6,499	1.6	0.2
Introduced Upland Vegetation - Perennial Grassland and Forbland	4	267	270	1.4	0.0
Southern Rocky Mountain Ponderosa Pine Woodland	831	97,097	97,928	0.8	3.3
Colorado Plateau Pinyon-Juniper Woodland	743	103,591	104,334	0.7	3.5
Rocky Mountain Lower Montane-Foothill Shrubland	7	5,865	5,872	0.1	0.2
Colorado Plateau Pinyon-Juniper Shrubland	0	111	111	0.0	0.0
Southern Rocky Mountain Pinyon-Juniper Woodland	0	435	435	0.0	0.0
North American Arid West Emergent Marsh	0	24	24	0.0	0.0
Inter-Mountain Basins Greasewood Flat	0	7	7	0.0	0.0
Inter-Mountain Basins Mat Saltbush Shrubland	0	50	50	0.0	0.0
Inter-Mountain Basins Mixed Salt Desert Scrub	0	1,153	1,153	0.0	0.0
Wyoming Basins Dwarf Sagebrush Shrubland and Steppe	0	22	22	0.0	0.0
Inter-Mountain Basins Semi-Desert Grassland	0	16	16	0.0	0.0
Inter-Mountain Basins Semi-Desert Shrub Steppe	0	7	7	0.0	0.0
Colorado Plateau Mixed Bedrock Canyon and Tableland	0	955	955	0.0	0.0

Inter-Mountain Basins Shale Badland	0	226	226	0.0	0.0
Introduced Upland Vegetation - Annual Grassland	0	123	123	0.0	0.0
Total	138,523	1,579,951	1,718,474	8.1	58.2

Representation @ < 10%

Rocky Mountain Lodgepole Pine Forest	12,747	162,104	174,850	7.3	5.9
Rocky Mountain Subalpine-Montane Riparian Woodland	31	588	619	5.0	0.0
Inter-Mountain Basins Montane Sagebrush Steppe	8,053	162,660	170,712	4.7	5.8
Inter-Mountain Basins Aspen-Mixed Conifer Forest and Woodland	3,831	88,186	92,017	4.2	3.1
Rocky Mountain Gambel Oak-Mixed Montane Shrubland	10,433	269,075	279,508	3.7	9.5
Rocky Mountain Lower Montane Riparian Woodland and Shrubland	32	1,055	1,088	2.9	0.0
Inter-Mountain Basins Big Sagebrush Shrubland	101	6,397	6,499	1.6	0.2
Introduced Upland Vegetation - Perennial Grassland and Forbland	4	267	270	1.4	0.0
Southern Rocky Mountain Ponderosa Pine Woodland	831	97,097	97,928	0.8	3.3
Colorado Plateau Pinyon-Juniper Woodland	743	103,591	104,334	0.7	3.5
Rocky Mountain Lower Montane-Foothill Shrubland	7	5,865	5,872	0.1	0.2
Colorado Plateau Pinyon-Juniper Shrubland	0	111	111	0.0	0.0
Southern Rocky Mountain Pinyon-Juniper Woodland	0	435	435	0.0	0.0
North American Arid West Emergent Marsh	0	24	24	0.0	0.0
Inter-Mountain Basins Greasewood Flat	0	7	7	0.0	0.0
Inter-Mountain Basins Mat Saltbush Shrubland	0	50	50	0.0	0.0
Inter-Mountain Basins Mixed Salt Desert Scrub	0	1,153	1,153	0.0	0.0
Wyoming Basins Dwarf Sagebrush Shrubland and Steppe	0	22	22	0.0	0.0
Inter-Mountain Basins Semi-Desert Grassland	0	16	16	0.0	0.0
Inter-Mountain Basins Semi-Desert Shrub Steppe	0	7	7	0.0	0.0
Colorado Plateau Mixed Bedrock Canyon and Tableland	0	955	955	0.0	0.0
Inter-Mountain Basins Shale Badland	0	226	226	0.0	0.0
Introduced Upland Vegetation - Annual Grassland	0	123	123	0.0	0.0
Total	36,811	900,015	936,826	3.9	31.7

Representation @ < 5%

Inter-Mountain Basins Montane Sagebrush Steppe	8,053	162,660	170,712	4.7	5.8
Inter-Mountain Basins Aspen-Mixed Conifer Forest and Woodland	3,831	88,186	92,017	4.2	3.1
Rocky Mountain Gambel Oak-Mixed Montane Shrubland	10,433	269,075	279,508	3.7	9.5

Rocky Mountain Lower Montane Riparian Woodland and Shrubland	32	1,055	1,088	2.9	0.0
Inter-Mountain Basins Big Sagebrush Shrubland	101	6,397	6,499	1.6	0.2
Introduced Upland Vegetation - Perennial Grassland and Forbland	4	267	270	1.4	0.0
Southern Rocky Mountain Ponderosa Pine Woodland	831	97,097	97,928	0.8	3.3
Colorado Plateau Pinyon-Juniper Woodland	743	103,591	104,334	0.7	3.5
Rocky Mountain Lower Montane-Foothill Shrubland	7	5,865	5,872	0.1	0.2
Colorado Plateau Pinyon-Juniper Shrubland	0	111	111	0.0	0.0
Southern Rocky Mountain Pinyon-Juniper Woodland	0	435	435	0.0	0.0
North American Arid West Emergent Marsh	0	24	24	0.0	0.0
Inter-Mountain Basins Greasewood Flat	0	7	7	0.0	0.0
Inter-Mountain Basins Mat Saltbush Shrubland	0	50	50	0.0	0.0
Inter-Mountain Basins Mixed Salt Desert Scrub	0	1,153	1,153	0.0	0.0
Wyoming Basins Dwarf Sagebrush Shrubland and Steppe	0	22	22	0.0	0.0
Inter-Mountain Basins Semi-Desert Grassland	0	16	16	0.0	0.0
Inter-Mountain Basins Semi-Desert Shrub Steppe	0	7	7	0.0	0.0
Colorado Plateau Mixed Bedrock Canyon and Tableland	0	955	955	0.0	0.0
Inter-Mountain Basins Shale Badland	0	226	226	0.0	0.0
Introduced Upland Vegetation - Annual Grassland	0	123	123	0.0	0.0
Total	24,034	737,323	761,357	3.2	25.8

Table 3, Tab 3: GMUG National Forest Ecosystem Representation at the Federal Scale

Ecological Group ("Ecosystem")	Rio Grande NF Wilderness (Acres)	Rio Grande NF Non-Wilderness (Acres)	All Rio Grande NF (Acres)	% Federal Wilderness	% Coverage, Rio Grande Forest Area
Representation @ < 20%					
Rocky Mountain Subalpine-Montane Riparian Woodland	2	516	518	17.9	0.0
Rocky Mountain Lodgepole Pine Forest	1,801	43,089	44,890	13.4	2.5
Southern Rocky Mountain Mesic Montane Mixed Conifer Forest and Woodland	2,069	56,698	58,767	13.4	3.3
Southern Rocky Mountain Dry-Mesic Montane Mixed Conifer Forest and Woodland	3,615	63,607	67,222	12.8	3.7
Southern Rocky Mountain Montane-Subalpine Grassland	6,478	184,796	191,274	12.2	10.6
Rocky Mountain Aspen Forest and Woodland	28,744	180,349	209,094	12.1	11.6
Southern Rocky Mountain Ponderosa Pine Woodland	634	63,099	63,733	9.2	3.5
Recently Logged Areas	2,809	21,751	24,560	6.8	1.4
Inter-Mountain Basins Aspen-Mixed Conifer Forest and Woodland	3,459	13,758	17,217	6.6	1.0
Inter-Mountain Basins Montane Sagebrush Steppe	39	3,590	3,629	6.5	0.2
Inter-Mountain Basins Semi-Desert Grassland	0	1,265	1,265	6.3	0.1
Open Water (Fresh)	670	2,557	3,227	5.2	0.2
Southern Rocky Mountain Pinyon-Juniper Woodland	244	46,843	47,087	5.0	2.6
Rocky Mountain Lower Montane Riparian Woodland and Shrubland	0	412	412	4.4	0.0
Colorado Plateau Pinyon-Juniper Woodland	0	180	180	4.0	0.0
Rocky Mountain Gambel Oak-Mixed Montane Shrubland	22	1,812	1,833	3.7	0.1
Inter-Mountain Basins Active and Stabilized Dune	0	1	1	2.8	0.0
Inter-Mountain Basins Big Sagebrush Shrubland	28	107	135	2.6	0.0
Inter-Mountain Basins Semi-Desert Shrub Steppe	0	6,470	6,470	2.4	0.4
Rocky Mountain Lower Montane-Foothill Shrubland	3	567	571	1.4	0.0
Introduced Upland Vegetation - Perennial Grassland and Forbland	2	126	128	0.8	0.0
Total	50,619	691,594	742,213	6.0	41.1
Representation @ < 10%					
Southern Rocky Mountain Ponderosa Pine Woodland	634	63,099	63,733	9.2	3.5
Recently Logged Areas	2,809	21,751	24,560	6.8	1.4
Inter-Mountain Basins Aspen-Mixed Conifer Forest and Woodland	3,459	13,758	17,217	6.6	1.0
Inter-Mountain Basins Montane Sagebrush Steppe	39	3,590	3,629	6.5	0.2

Inter-Mountain Basins Semi-Desert Grassland	0	1,265	1,265	6.3	0.1
Open Water (Fresh)	670	2,557	3,227	5.2	0.2
Southern Rocky Mountain Pinyon-Juniper Woodland	244	46,843	47,087	5.0	2.6
Rocky Mountain Lower Montane Riparian Woodland and Shrubland	0	412	412	4.4	0.0
Colorado Plateau Pinyon-Juniper Woodland	0	180	180	4.0	0.0
Rocky Mountain Gambel Oak-Mixed Montane Shrubland	22	1,812	1,833	3.7	0.1
Inter-Mountain Basins Active and Stabilized Dune	0	1	1	2.8	0.0
Inter-Mountain Basins Big Sagebrush Shrubland	28	107	135	2.6	0.0
Inter-Mountain Basins Semi-Desert Shrub Steppe	0	6,470	6,470	2.4	0.4
Rocky Mountain Lower Montane-Foothill Shrubland	3	567	571	1.4	0.0
Introduced Upland Vegetation - Perennial Grassland and Forbland	2	126	128	0.8	0.0
Total	7,910	162,538	170,448	4.5	9.4

Representation @ < 5%

Rocky Mountain Lower Montane Riparian Woodland and Shrubland	0	412	412	4.4	0.0
Colorado Plateau Pinyon-Juniper Woodland	0	180	180	4.0	0.0
Rocky Mountain Gambel Oak-Mixed Montane Shrubland	22	1,812	1,833	3.7	0.1
Inter-Mountain Basins Active and Stabilized Dune	0	1	1	2.8	0.0
Inter-Mountain Basins Big Sagebrush Shrubland	28	107	135	2.6	0.0
Inter-Mountain Basins Semi-Desert Shrub Steppe	0	6,470	6,470	2.4	0.4
Rocky Mountain Lower Montane-Foothill Shrubland	3	567	571	1.4	0.0
Introduced Upland Vegetation - Perennial Grassland and Forbland	2	126	128	0.8	0.0
Total	55	9,675	9,730	3.0	0.5

Table 4: Colorado Roadless Area Analysis of Ecosystem Composition										
<i>Values are the estimated acres of each ecosystem occurring within each Wilderness Inventory Unit. Orange cells represent a combination of units whose protection would achieve adequate representation on the forest level.</i>										
Ecosystem	Forest Ecosystem Representation	Acres needed for adequate protection in wilderness (>20%)	Number of Roadless Areas to Reach Adequate Protection	Colorado Roadless Areas						
				Deer Creek	Battlements	Cochetopa	Flattops/Elk Park	Kannah Creek	Cochetopa Hills	Sawtooth
Colorado Plateau Mixed Bedrock Canyon and Tableland	< 5	191	1	0	0	0	0	107	0	0
Colorado Plateau Pinyon-Juniper Woodland	< 5	20,867	3	0	8	0	2	10,364	0	0
Inter-Mountain Basins Aspen-Mixed Conifer Forest and Woodland	< 5	18,403	NA	21	140	27	1,354	542	618	498
Inter-Mountain Basins Big Sagebrush Shrubland	< 5	1,300	NA	0	0	0	0	21	0	0
Inter-Mountain Basins Mat Saltbush Shrubland	< 5	10	1	0	0	0	0	33	0	0
Inter-Mountain Basins Mixed Salt Desert Scrub	< 5	231	1	0	0	0	0	127	0	0
Inter-Mountain Basins Montane Sagebrush Steppe	< 5	34,142	NA	241	1,547	53	653	2,739	1,389	689
Inter-Mountain Basins Semi-Desert Grassland	< 5	3	1	0	0	0	0	0	0	0
Inter-Mountain Basins Semi-Desert Shrub Steppe	< 5	1	1	0	0	0	0	0	0	0
Inter-Mountain Basins Shale Badland	< 5	45	1	0	0	0	0	0	0	0
Introduced Upland Vegetation - Perennial Grassland and Forbland	< 5	54	NA	1	1	0	4	0	0	0
North American Arid West Emergent Marsh	< 5	5	2	0	0	0	0	0	0	0
Rocky Mountain Gambel Oak-Mixed Montane Shrubland	< 5	55,902	9	0	4,747	0	1,331	6,691	64	0
Rocky Mountain Lower Montane Riparian Woodland and Shrubland	< 5	218	5	0	0	0	0	51	1	0
Rocky Mountain Lower Montane-Foothill Shrubland	< 5	1,174	1	0	12	0	2	13	0	0
Southern Rocky Mountain Pinyon-Juniper Woodland	< 5	87	1	0	0	0	0	0	94	0
Southern Rocky Mountain Ponderosa Pine Woodland	< 5	19,586	NA	0	2	94	1	10	1,237	466
Wyoming Basins Dwarf Sagebrush Shrubland and Steppe	< 5	4	2	0	0	0	0	0	0	0
Recently Logged Areas	5 - 10	3,321	NA	30	58	0	866	7	12	169
Rocky Mountain Lodgepole Pine Forest	5 - 10	34,970	4	42	0	101	0	4	20,253	1,165
Rocky Mountain Subalpine-Montane Riparian Woodland	5 - 10	124	5	0	0	0	0	2	55	1
Open Water (Fresh)	11 - 20	1,461	NA	2	2	1	48	24	7	0
Rocky Mountain Aspen Forest and Woodland	11 - 20	104,856	13	2,796	8,983	1,760	15,949	6,634	1,801	7,604
Rocky Mountain Subalpine-Montane Limber-Bristlecone Pine Woodland	11 - 20	1,179	NA	0	0	254	0	0	307	57
Rocky Mountain Subalpine-Montane Mesic Meadow	11 - 20	16,199	10	1,604	1,816	301	5,874	1,090	86	268
Southern Rocky Mountain Dry-Mesic Montane Mixed Conifer Forest and Woodland	11 - 20	10,861	10	14	38	84	57	315	3,711	397
Southern Rocky Mountain Mesic Montane Mixed Conifer Forest and Woodland	11 - 20	10,219	6	5	8	80	18	79	4,074	258
Southern Rocky Mountain Montane-Subalpine Grassland	11 - 20	11,554	16	1,647	1,291	1,024	1,005	899	876	815
Inter-Mountain Basins Active and Stabilized Dune	> 20	NA	NA	0	0	0	0	0	0	0
Quarries, Mines, Gravel Pits and Oil Wells	> 20	NA	NA	0	0	0	0	0	0	0
Rocky Mountain Alpine Bedrock and Scree	> 20	NA	NA	44	0	0	5	0	268	58
Rocky Mountain Alpine Fell-Field	> 20	NA	NA	2	226	0	613	0	0	113
Rocky Mountain Alpine Turf	> 20	NA	NA	111	0	0	0	0	155	59
Rocky Mountain Alpine-Montane Wet Meadow	> 20	NA	NA	376	475	47	2,254	83	262	528
Rocky Mountain Cliff, Canyon and Massive Bedrock	> 20	NA	NA	42	519	148	520	1,910	242	64
Rocky Mountain Subalpine Dry-Mesic Spruce-Fir Forest and Woodland	> 20	NA	NA	1,448	3,028	1,679	32,726	2,059	6,042	4,581
Rocky Mountain Subalpine Mesic Spruce-Fir Forest and Woodland	> 20	NA	NA	723	1,258	622	10,902	538	6,567	4,333
Rocky Mountain Subalpine-Montane Riparian Shrubland	> 20	NA	NA	286	231	348	1,403	114	319	701

Double Top	Granite Basin	Curecanti	Mendicant	Last Dollar/Sheep Creek	Cannibal Plateau	Clear Fork	Whetstone	Matchless Mountain	Turner Creek	Mount Lamborn	Baldy	Failes Creek/Sold	Castle	Soap Creek
0	0	0	0	0	0	0	0	0	0	24	0	0	0	0
0	3	4	4	0	0	6	0	0	0	1,155	77	0	0	145
68	27	131	684	98	18	189	68	52	181	435	38	75	445	97
0	0	0	0	0	0	0	0	0	0	50	0	0	0	38
0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
0	0	0	0	0	0	0	0	0	0	51	0	0	0	0
149	789	1,416	776	16	28	420	134	1,052	165	2,151	41	28	28	2,591
0	0	0	0	0	0	0	0	0	0	5	0	0	0	0
0	0	0	0	0	0	0	0	0	0	0	0	6	0	0
0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
0	0	0	0	0	0	0	0	1	1	29	0	5	0	0
0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
0	4	398	731	2	0	2,636	3	30	121	4,639	423	3	7	527
0	0	0	0	0	0	2	0	0	0	0	0	0	0	14
0	0	0	0	0	0	0	0	0	0	129	0	0	0	11
0	5	0	0	0	0	0	0	20	0	0	0	0	0	2
0	130	61	4	1	2	0	0	869	0	81	27	3	0	144
0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
169	91	15	40	26	8	119	25	164	33	8	0	10	0	0
34	4,333	13	2	4	0	0	47	9,826	0	3	0	24	6	1
0	2	0	0	0	0	0	0	14	0	2	0	0	0	0
0	4	2	49	6	3	0	16	0	0	79	0	0	6	4
3,755	2,350	3,301	6,179	1,204	1,401	13,455	2,620	1,266	6,121	6,666	756	1,017	2,866	1,650
0	93	0	0	0	0	0	0	137	0	0	0	0	0	0
1,732	1,256	126	473	153	179	793	574	907	776	251	80	221	530	22
26	901	869	104	7	0	116	112	1,012	37	536	12	83	78	992
9	413	525	140	1	0	171	85	256	15	524	7	95	14	401
772	636	492	477	380	380	365	361	341	286	281	225	218	190	185
0	0	0	1	0	0	0	0	0	0	0	0	0	0	0
0	0	0	2	0	0	0	0	3	0	0	0	0	0	0
665	510	0	244	1,005	773	32	1,786	709	2	124	0	12	0	0
120	64	0	29	38	415	7	74	0	0	11	0	6	0	0
1,525	362	0	10	250	1,874	10	271	854	0	1	0	25	2	0
1,210	504	49	561	60	26	415	180	160	219	259	2	266	135	13
139	273	339	618	464	362	79	1,257	169	326	1,182	17	68	20	311
6,379	5,802	1,885	3,732	1,815	4,040	3,110	3,717	4,198	2,792	1,159	170	3,181	2,919	302
4,785	6,237	2,616	3,596	606	2,848	1,404	3,825	3,966	1,662	2,056	264	3,431	1,901	510
2,193	725	131	628	141	2,140	991	273	988	100	400	2	175	236	88

Salt Creek	East Elk	Gothic	Huntsman Rid	Crystal Pea	Cimarron R	Italian Mountair	Mineral Mount	Poverty Gulch	Whitehouse M	Cottonwoods	Canyon Cr	Steuben	American Flag Mo	Schofield F	Beckwiths	Kelso Mesa
0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1
0	21	0	0	0	0	0	0	0	0	18	0	14	0	0	73	7,343
283	46	1	61	3	417	0	43	0	119	832	1	38	0	1	367	462
0	0	0	0	0	0	0	0	0	0	0	0	2	0	0	0	66
0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
12	453	11	126	0	19	0	0	112	3	210	40	477	3	10	762	2,152
0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	3
213	3	0	1,862	0	13	0	0	5	15	2,193	0	24	0	0	1,875	14,342
0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	25
0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1,400
0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
0	107	0	0	0	0	0	0	0	26	3	11	90	0	0	40	1,846
0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	3
1	9	36	41	7	49	19	5	54	40	0	11	10	26	0	7	0
0	27	0	0	0	12	539	1	3	2	0	2,600	28	2,637	0	3	0
0	0	0	4	0	0	0	0	2	0	12	0	0	1	0	0	0
0	2	2	0	4	8	0	0	0	28	2	0	0	10	0	28	0
4,891	1,148	578	6,327	1,992	2,639	82	628	379	485	5,067	52	1,251	36	169	6,162	5,682
0	0	0	0	0	0	0	70	0	0	0	74	0	3	0	0	0
356	84	401	686	48	172	231	26	399	48	388	314	20	331	110	321	14
20	965	0	35	12	89	0	31	15	98	59	12	594	0	0	767	242
23	454	0	26	3	92	0	83	6	200	149	0	389	0	0	747	1,212
138	132	123	117	110	94	82	75	67	63	60	44	40	38	38	35	34
0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
0	0	0	0	0	0	6	0	0	0	0	2	0	4	0	0	0
0	0	742	0	1,106	116	1,354	10	1,012	4,685	0	957	0	330	63	1,236	0
0	1	63	0	143	28	150	0	103	142	0	202	0	11	8	26	0
0	0	155	0	2,510	0	1,275	2	137	628	0	848	0	325	4	5	0
98	24	514	498	93	77	49	16	529	95	18	2	18	72	191	115	0
0	230	258	12	226	159	36	13	146	218	10	208	9	32	3	843	0
1,871	1,302	929	614	2,550	4,504	1,894	405	186	2,717	846	2,671	250	3,615	106	1,660	1
928	972	1,222	89	2,082	4,061	1,919	884	959	4,387	1,211	2,052	174	3,496	6	2,891	24
158	30	739	60	626	56	1,278	65	1,278	160	138	695	10	818	158	446	0

Turret Ridge	Hightower	Sanford Basin	Beaver	Currant Creek	Electric Mountain	Dominguez	Agate Creek	Little Cimarro	Windy Point	Matterhorn	Sunnyside	Carson	Pilot Knob	Horse Ran
0	0	0	0	0	0	0	0	0	0	0	671	0	0	0
0	0	0	4	0	0	5,206	0	0	2,346	0	6,236	0	36	0
271	31	0	53	11	886	0	23	19	28	0	2	43	207	34
0	0	0	1	0	0	54	0	0	4	0	66	0	0	0
0	0	0	0	0	0	0	0	0	0	0	15	0	0	0
0	0	0	0	0	0	0	0	0	0	0	566	0	0	0
0	641	62	556	111	60	1,704	4	0	85	0	186	0	1,998	18
0	0	0	0	0	0	0	0	0	0	0	2	0	0	0
0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
0	0	0	0	0	0	0	0	0	0	0	220	0	0	0
0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
0	0	0	0	0	0	0	0	0	0	0	2	0	0	0
0	381	0	4	3,902	409	4,547	4	0	6,389	0	672	0	2,769	70
0	0	0	0	0	0	5	0	0	0	0	0	0	8	0
0	0	0	0	1	0	65	0	0	82	0	25	0	1	0
0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
0	0	0	43	0	0	305	22	0	1,285	0	8	0	10	0
0	0	0	0	0	0	2	0	0	0	0	0	0	0	0
98	0	0	0	0	0	0	1	1	0	9	0	2	0	0
0	0	1,988	85	0	9	0	4,060	45	0	0	0	0	0	0
0	0	0	0	0	0	0	4	0	0	0	3	0	11	0
10	0	5	0	0	0	0	0	10	0	0	0	0	3	0
237	2,440	271	888	6,093	5,651	291	70	445	1,990	235	37	334	11,353	2,795
0	0	15	0	0	0	0	6	0	0	0	0	0	0	0
29	28	234	10	68	32	0	344	14	280	31	3	0	4	16
19	0	0	618	5	137	45	115	59	73	0	85	0	145	12
18	0	0	659	0	209	139	38	1	67	0	88	0	399	7
30	26	25	23	21	20	20	19	16	14	13	8	7	6	5
0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
0	0	0	0	0	0	0	2	0	0	0	0	0	0	0
224	0	1,104	0	0	0	0	221	159	0	825	0	650	0	38
2	0	699	0	0	0	0	205	40	0	46	0	367	0	5
3	0	1,195	0	0	0	0	180	64	0	1,404	0	211	0	1
0	2	17	6	32	57	0	4	14	0	118	1	19	2	60
107	0	87	30	3	10	54	10	167	0	72	1,458	146	17	119
2,465	8	3,597	273	449	813	0	3,416	1,770	1	325	0	1,492	15	475
1,920	18	2,350	409	12	1,345	0	2,749	1,346	6	274	0	2,180	68	119
26	4	1,220	13	37	63	0	333	50	0	180	0	516	151	110

Wilson	Unawweep	Munsey/E	Texas Cree	Mirror Lake	Tomahawk	Union	Hope Lake	Long Canyon	Johnson Basin	Willow Creek	Flat Irons	Horsefly Canyon	Naturita Canyon	Calamity Bas	Crystal Creek
0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
0	626	45	0	0	17	0	0	2,882	1,269	0	55	1,315	1,792	4,447	0
322	954	62	0	0	619	0	0	170	323	11	193	3	0	151	0
0	48	25	0	0	0	0	0	4	2	0	0	0	0	58	0
0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
0	628	66	0	0	741	0	0	955	140	0	341	7	30	719	0
0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
0	0	0	0	0	0	0	0	0	0	0	0	0	0	8	0
0	0	0	0	0	0	0	0	0	0	0	0	0	0	2	0
0	5,170	755	0	0	2,689	0	0	6,685	5,611	0	4,651	2,721	367	5,258	0
0	35	10	0	0	0	0	0	16	3	0	3	91	3	0	0
0	329	0	0	0	1	0	0	223	112	0	1	18	0	194	0
0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
0	532	6	0	0	8	0	0	2,013	907	0	222	669	1,930	469	14
0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
2	0	0	0	4	0	0	38	0	0	0	0	0	0	0	0
0	0	0	1,700	124	16	476	0	0	0	6	0	0	0	0	262
0	0	0	0	0	1	0	0	0	0	0	32	0	0	0	0
0	0	0	0	26	16	1	59	0	0	0	0	0	0	0	0
458	1,001	1,756	18	22	7,198	3	96	2,529	2,555	135	2,865	130	6	784	0
0	0	0	0	8	0	0	0	0	0	0	0	0	0	0	0
4	799	1	4	129	5	44	33	16	70	0	0	0	0	17	0
0	320	383	0	0	373	1	0	424	248	1	890	250	157	33	31
0	1,290	258	0	0	208	1	0	956	514	0	2,209	703	196	82	39
4	4	4	3	3	2	2	1	1	0	0	0	0	0	0	0
0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
491	0	0	0	681	0	2	3,643	0	0	0	0	0	0	0	0
6	0	0	0	340	0	0	345	0	0	0	0	0	0	0	0
14	0	0	0	1,442	0	12	622	0	0	0	0	0	0	0	0
8	0	16	0	1	0	5	35	0	0	3	0	0	0	0	0
4	119	24	0	19	12	21	165	0	1	0	6	0	0	0	9
503	21	67	702	1,289	519	166	931	22	3	138	8	0	0	6	48
773	244	33	174	1,138	346	808	1,457	63	47	0	14	0	0	51	128
33	0	1	32	777	50	16	702	0	0	0	0	0	0	0	1

Sunset	Flattop Mour	McClure Pass	Canyon Ck	Cataract	North Hen
0	0	0	0	0	0
0	0	0	0	0	0
570	625	132	0	0	0
0	0	0	0	0	0
0	0	0	0	0	0
0	0	0	0	0	0
75	1,566	0	0	0	0
0	0	0	0	0	0
0	0	0	0	0	0
0	0	0	0	0	0
0	1	0	0	0	0
0	0	0	0	0	0
846	10	0	0	0	0
0	0	0	0	0	0
0	0	0	0	0	0
0	0	0	0	0	0
0	21	0	0	0	0
0	0	0	0	0	0
0	2	0	0	4	1
0	0	0	2	0	0
0	0	0	0	0	0
0	0	0	0	13	0
3,728	1,631	138	1	3	2
0	0	0	0	0	0
2	280	0	159	8	0
65	1	2	0	0	0
33	3	0	0	0	0
0	0	0	0	0	0
0	0	0	0	0	0
0	0	0	0	0	0
0	0	0	759	1,968	8
0	0	0	94	809	1
0	0	0	168	4,121	0
0	0	0	3	103	0
15	220	0	7	14	0
264	642	12	263	429	29
165	408	56	17	774	554
18	0	0	123	1,772	1

Example of Region 5's Incorporation of Ecosystem Representation Analysis into Chapter 70 Inventory

**Inyo NF Wilderness Inventory Areas
Summary of The Wilderness Society's data on
Under-represented Ecosystems in the National Wilderness Preservation System**

Background

The Wilderness Society comments indicated the Wilderness Evaluation process should consider the suitability of Wilderness Inventory Areas with under-represented and rare ecosystems. The Wilderness Society utilized several sets of available information at the national scale to identify under-represented ecosystems in the National Wilderness Preservation System (NWPS).

The National Vegetation Classification System Group 6¹ data was used to identify the set of thirty-six ecological groups within the Inyo NF. For each ecological group on the forest, they provided two calculations: the percentage of an ecological group's total area that is within the NWPS; the percentage of an ecological group's area within the Inyo NF that is within designated wilderness. The ecological groups were divided into four classes of representation, which are termed categories A through D below.

Category A is ecological groups on the Inyo NF that have less than five percent of their area protected within the NWPS:

1. *Great Basin Xeric Mixed Sagebrush Shrubland- 3% protected in NWPS*
2. *Inter-Mountain Basins Big Sagebrush Shrubland-3% protected in NWPS*
3. *Inter-Mountain Basins Semi-Desert Shrub Steppe-2% protected in NWPS*
4. *Inter-Mountain Basins Mixed Salt Desert Scrub – 2% protected in NWPS*

Category B is ecological groups on the Inyo NF that have between five and ten percent of their area protected within the NWPS:

1. *Great Basin Foothill & Lower Montane Riparian Woodland and Shrubland- 9% protected in NWPS*
2. *Inter-Mountain Basins Montane Sagebrush Steppe – 7% protected in NWPS.*

Category C is ecological groups on the Inyo NF that have between ten and twenty percent of their area protected within the NWPS. The Wilderness Society indicated it considers ecosystems with less than twenty percent of its total area in the NWPS as inadequately represented².

1. *Great Basin Pinyon-Juniper Woodlands – 14% of ecosystem protected in NWPS*
2. *Rocky Mountain Aspen Forest and Woodland – 12% of ecosystem protected in NWPS.*

Category D is ecological groups on the Inyo NF that have more than twenty percent of their area protected within the NWPS, and are not discussed further.

Data Management and processing

1. Eight of thirty-six ecological types were not considered in this summary because their label indicated they are developed land.
2. Area size information was converted from hectares to acres.
3. Ecosystems in each category were ranked by size, largest to smallest.

¹ The National Vegetation Classification System website indicates the ecological context for Group 6 data: regional mesoclimate, geology, substrates, hydrology and disturbance regimes.

² The twenty percent representation threshold is based on Society for Conservation Biology and Convention on Biological Diversity targets (personal communication with Matt Dietz).

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4. Ecosystems in each category with less than 1,000 total acres on all Inyo NF non-wilderness lands were not included in this summary.
5. For each category, the acres for the ecological groups in that category were summed for each wilderness inventory unit.
6. The percentage of each wilderness inventory unit's total area comprised of "under-represented" ecological groups was calculated for each of the Categories A-C.

The table below summarizes the Wilderness Society representation data for each wilderness inventory area listed in the polygon column:

General location: 1988 Forest Plan management area labels describe the general location of the inventory unit, and whether the unit is adjacent to designated wilderness.

Size: The area in acres indicated is the "parent polygon".

Category A: The summary first displays the percentage of the wilderness inventory unit comprised of Category A ecological groups, and the types of type of ecological groups in Category A within the inventory unit. Any ecological groups with more than 1,000 acres in an inventory unit is highlighted in bold font.

Category B: The summary first displays the percentage of the wilderness inventory unit comprised of Category B ecological groups, and the types of type of ecological groups in Category B within the inventory unit. Any ecological groups with more than 1,000 acres in an inventory unit is highlighted in bold font.

Category C: Next, the summary displays the percentage of the wilderness inventory unit comprised of Category C ecological groups, and the types of ecological groups in Category C within the inventory unit. Any ecological groups with more than 1,000 acres in an inventory unit is highlighted in bold font. The difference between Category B and Category C for most inventory units is largely attributed to the addition of *Great Basin Pinyon-Juniper Woodland* in Category C acreage.

Note: The percent of the wilderness inventory unit comprised of Category B ecological groups includes the area of Category A ecological groups (the names of the Category A ecosystems, however, are not listed again under Category B). The percent of the wilderness inventory unit comprised of Category C ecological groups includes the area of both Category A and B ecological groups

Inyo NF Representation: The percentage of a unit's area comprised of ecological groups with less than twenty percent total acreage for the ecological group on the Inyo NF in designated wilderness. The twenty percent representation is the only category displayed for Inyo NF because only six of fifty-five wilderness inventory units have more than 1,000 acres of ecological groups with less than twenty percent of their total acreage on the forest in designated wilderness. The ecological groups in this category include:

**Inyo NF Wilderness Inventory Areas
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- *Inter-Mountain Basins Mixed Salt Desert Scrub*
- *Great Basin Xeric Mixed Sagebrush Shrubland*
- *Inter-Mountain Basins Semi-Desert Shrub Steppe*

Wilderness Inventory Units	National Vegetation Classification System summary
944	<p>General location: Benton-Casa Diablo Management Area Size: 7,629 acres</p> <p>Category A: 40% of the inventory unit is comprised of the following ecological groups, which have less than five percent of their total area protected in the NWPS:</p> <ul style="list-style-type: none"> • <i>Great Basin Xeric Mixed Sagebrush Shrubland</i> • <i>Inter-Mountain Basins Big Sagebrush Shrubland</i> • <i>Inter-Mountain Basins Semi-Desert Shrub Steppe</i> • <i>Inter-Mountain Basins Mixed Salt Desert Scrub</i> <p>Category B: 61% of this inventory unit is comprised of ecological groups which have less than ten percent of their total area protected in the NWPS. Ecological groups in category B include:</p> <ul style="list-style-type: none"> • <i>Inter-Mountain Basins Montane Sagebrush Steppe</i> <p>Category C: 100% of the inventory unit is comprised of ecological groups which have less than twenty percent of their total area protected in the NWPS. Ecological groups in Category C include:</p> <ul style="list-style-type: none"> • <i>Great Basin Pinyon-Juniper Woodlands</i> <p>Inyo NF representation: This inventory unit does not contain any ecological groups with less than twenty percent of their area on the Inyo NF in designated wilderness.</p>
995	<p>General location: Benton-Casa Diablo Management Area Size: 5,806 acres</p> <p>Category A: 2% of the inventory unit is comprised of the following ecological groups, which have less than five percent of their total area protected in the NWPS:</p> <ul style="list-style-type: none"> • <i>Inter-Mountain Basins Big Sagebrush Shrubland</i> • <i>Great Basin Xeric Mixed Sagebrush Shrubland</i> <p>Category B: 35% of this inventory unit is comprised of ecological groups which have less than ten percent of their total area protected in the NWPS. Ecological groups in category B include:</p> <ul style="list-style-type: none"> • <i>Inter-Mountain Basins Montane Sagebrush Steppe</i>

**Inyo NF Wilderness Inventory Areas
Summary of The Wilderness Society's data on
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	<ul style="list-style-type: none"> • <i>Great Basin Foothill & Lower Montane Riparian Woodland and Shrubland</i> <p>Category C: 98% percent of the inventory unit is comprised of ecological groups which have less than twenty percent of their total area protected in the NWPS. Ecological groups in Category C include:</p> <ul style="list-style-type: none"> • <i>Great Basin Pinyon-Juniper Woodlands</i> <p>Inyo NF representation: This inventory unit does not contain any ecological groups with less than twenty percent of their area on the Inyo NF in designated wilderness.</p>
1012	<p>General location: Glass Mountain and Benton-Casa Diablo Management Areas Size: 40,368 acres</p> <p>Category A: 10% of the inventory unit is comprised of the following ecological groups, which have less than five percent of their total area protected in the NWPS:</p> <ul style="list-style-type: none"> • <i>Inter-Mountain Basins Big Sagebrush Shrubland</i> • <i>Inter-Mountain Basins Mixed Salt Desert Scrub</i> • <i>Great Basin Xeric Mixed Sagebrush Shrubland</i> • <i>Inter-Mountain Basins Semi-Desert Shrub Steppe</i> <p>Category B: 32% of this inventory unit is comprised of ecological groups which have less than ten percent of their total area protected in the NWPS. Ecological groups in category B include:</p> <ul style="list-style-type: none"> • <i>Inter-Mountain Basins Montane Sagebrush Steppe</i> • <i>Great Basin Foothill and Lower Montane Riparian Woodland and Shrubland</i> <p>Category C: 75% of the inventory unit is comprised of ecological groups which have less than twenty percent of their total area protected in the NWPS. Ecological groups in Category C include:</p> <ul style="list-style-type: none"> • <i>Great Basin Pinyon-Juniper Woodland</i> • <i>Rocky Mountain Aspen Forest and Woodland</i> <p>Inyo NF representation: Less than one percent of the area of this inventory unit contains ecological groups with less than twenty percent of their area on the Inyo NF in designated wilderness.</p>
1039	<p>General location: Glass Mountain Management Area Size: 11,026 acres</p> <p>Category A: 3% of the inventory unit is comprised of the following ecological groups, which have less than five percent of their total area protected in the NWPS:</p> <ul style="list-style-type: none"> • <i>Inter-Mountain Basins Big Sagebrush Shrubland</i> • <i>Great Basin Xeric Mixed Sagebrush Shrubland</i>

**Inyo NF Wilderness Inventory Areas
Summary of The Wilderness Society's data on
Under-represented Ecosystems in the National Wilderness Preservation System**

	<p>Category B: 20% of this inventory unit is comprised of ecological groups which have less than ten percent of their total area protected in the NWPS. Ecological groups in category B include:</p> <ul style="list-style-type: none"> • <i>Inter-Mountain Basins Montane Sagebrush Steppe</i> • <i>Great Basin Foothill and Lower Montane Riparian Woodland and Shrubland</i> <p>Category C: 97% of the inventory unit is comprised of ecological groups which have less than twenty percent of their total area protected in the NWPS. Ecological groups in Category C include:</p> <ul style="list-style-type: none"> • <i>Great Basin Pinyon-Juniper Woodland</i> <p>Inyo NF representation: This inventory unit does not contain any ecological groups with less than twenty percent of their area on the Inyo NF in designated wilderness.</p>
<p>1068</p>	<p>General location: Glass Mountain Management Area Size: 12,311 acres</p> <p>Category A: 20% of the inventory unit is comprised of the following ecological groups, which have less than five percent of their total area protected in the NWPS:</p> <ul style="list-style-type: none"> • <i>Inter-Mountain Basins Big Sagebrush Shrubland</i> • <i>Inter-Mountain Basins Mixed Salt Desert Scrub</i> • <i>Great Basin Xeric Mixed Sagebrush Shrubland</i> • <i>Inter-Mountain Basins Semi-Desert Shrub Steppe</i> <p>Category B: 63% of this inventory unit is comprised of ecological groups which have less than ten percent of their total area protected in the NWPS. Ecological groups in category B include:</p> <ul style="list-style-type: none"> • <i>Inter-Mountain Basins Montane Sagebrush Steppe</i> • <i>Great Basin Foothill and Lower Montane Riparian Woodland and Shrubland</i> <p>Category C: 93% of the inventory unit is comprised of ecological groups which have less than twenty percent of their total area protected in the NWPS. Ecological groups in Category C include:</p> <ul style="list-style-type: none"> • <i>Great Basin Pinyon-Juniper Woodland</i> • <i>Rocky Mountain Aspen Forest and Woodland</i> <p>Inyo NF representation: Less than one percent of the area of this inventory unit contains ecological groups with less than twenty percent of their area on the Inyo NF in designated wilderness.</p>
<p>1072</p>	<p>General location: Mono Basin and Glass Mountain Management Areas Size: 7,574 acres</p>

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	<p>Category A: 57% percent of the inventory unit is comprised of the following ecological groups, which have less than five percent of their total area protected in the NWPS:</p> <ul style="list-style-type: none"> • <i>Inter-Mountain Basins Big Sagebrush Shrubland</i> <p>Category B: 57% of this inventory unit is comprised of ecological groups which have less than ten percent of their total area protected in the NWPS. Ecological groups in category B include:</p> <ul style="list-style-type: none"> • <i>Great Basin Foothill and Lower Montane Riparian Woodland and Shrubland</i> <p>Category C: 69% of the inventory unit is comprised of ecological groups which have less than twenty percent of their total area protected in the NWPS. Ecological groups in Category C include:</p> <ul style="list-style-type: none"> • <i>Great Basin Pinyon-Juniper Woodland</i> • <i>Rocky Mountain Aspen Forest and Woodland</i> <p>Inyo NF representation: This inventory unit does not contain any ecological groups with less than twenty percent of their area on the Inyo NF in designated wilderness.</p>
<p>1080</p>	<p>General location: South Sierra Management Area Size: 1,137 acres adjacent to South Sierra Wilderness</p> <p>Category A: 39% of the inventory unit is comprised of the following ecological groups, which have less than five percent of their total area protected in the NWPS:</p> <ul style="list-style-type: none"> • <i>Inter-Mountain Basins Big Sagebrush Shrubland</i> <p>Category B: none</p> <p>Category C: 52% of the inventory unit is comprised of ecological groups which have less than twenty percent of their total area protected in the NWPS. Ecological groups in Category C include:</p> <ul style="list-style-type: none"> • <i>Great Basin Pinyon-Juniper Woodland</i> • <i>Rocky Mountain Aspen Forest and Woodland</i> <p>Inyo NF representation: This inventory unit does not contain any ecological groups with less than twenty percent of their area on the Inyo NF in designated wilderness.</p>
<p>1081</p>	<p>General location: South Sierra Management Area Size: 5,413 acres adjacent to Golden Trout Wilderness</p> <p>Category A: 8% of the inventory unit is comprised of the following ecological groups, which have less than five percent of their total area protected in the NWPS:</p> <ul style="list-style-type: none"> • <i>Inter-Mountain Basins Big Sagebrush Shrubland</i>

**Inyo NF Wilderness Inventory Areas
Summary of The Wilderness Society's data on
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	<p>Category B: none</p> <p>Category C: 27% of the inventory unit is comprised of ecological groups which have less than twenty percent of their total area protected in the NWPS. Ecological groups in Category C include:</p> <ul style="list-style-type: none"> • <i>Great Basin Pinyon-Juniper Woodland</i> • <i>Rocky Mountain Aspen Forest and Woodland</i> <p>Inyo NF representation: This inventory unit does not contain any ecological groups with less than twenty percent of their area on the Inyo NF in designated wilderness.</p>
<p>1092</p>	<p>General location: Golden Trout Management Area Size: 4,552 acres adjacent to Golden Trout Wilderness</p> <p>Category A: 1% of the inventory unit is comprised of the following ecological groups, which have less than five percent of their total area protected in the NWPS:</p> <ul style="list-style-type: none"> • <i>Inter-Mountain Basins Big Sagebrush Shrubland</i> <p>Category B: 1% of this inventory unit is comprised of ecological groups which have less than ten percent of their total area protected in the NWPS. Ecological groups in category B include:</p> <ul style="list-style-type: none"> • <i>Great Basin Foothill and Lower Montane Riparian Woodland and Shrubland</i> <p>Category C: 23% of the inventory unit is comprised of ecological groups which have less than twenty percent of their total area protected in the NWPS. Ecological groups in Category C include:</p> <ul style="list-style-type: none"> • <i>Great Basin Pinyon-Juniper Woodland</i> • <i>Rocky Mountain Aspen Forest and Woodland</i> <p>Inyo NF representation: This inventory unit does not contain any ecological groups with less than twenty percent of their area on the Inyo NF in designated wilderness.</p>
<p>1098</p>	<p>General location: Owens Valley Escarpment Management Area Size: 1,476 acres adjacent to John Muir Wilderness</p> <p>Category A: None</p> <p>Category B: Less than one percent of this inventory unit is comprised of ecological groups which have less than ten percent of their total area protected in the NWPS. Ecological groups in category B include:</p> <ul style="list-style-type: none"> • <i>Great Basin Foothill and Lower Montane Riparian Woodland and Shrubland</i> <p>Category C: 5% of the inventory unit is comprised of ecological groups which have less than twenty percent of their total area protected in the NWPS. Ecological</p>

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	<p>groups in Category C include:</p> <ul style="list-style-type: none"> • <i>Great Basin Pinyon-Juniper Woodland</i> • <i>Rocky Mountain Aspen Forest and Woodland</i> <p>Inyo NF representation: This inventory unit does not contain any ecological groups with less than twenty percent of their area on the Inyo NF in designated wilderness.</p>
1099	<p>General location: Owens Valley Escarpment Management Area Size: 1,092 acres adjacent to John Muir Wilderness</p> <p>Category A: None</p> <p>Category B: Less than one percent of this inventory unit is comprised of ecological groups which have less than ten percent of their total area protected in the NWPS. Ecological groups in category B include:</p> <ul style="list-style-type: none"> • <i>Great Basin Foothill and Lower Montane Riparian Woodland and Shrubland</i> <p>Category C: 13% of the inventory unit is comprised of ecological groups which have less than twenty percent of their total area protected in the NWPS. Ecological groups in Category C include:</p> <ul style="list-style-type: none"> • <i>Great Basin Pinyon-Juniper Woodland</i> • <i>Rocky Mountain Aspen Forest and Woodland</i> <p>Inyo NF representation: This inventory unit does not contain any ecological groups with less than twenty percent of their area on the Inyo NF in designated wilderness.</p>
1106	<p>General location: Owens Valley Escarpment Management Area Size: 1,408 acres adjacent to John Muir Wilderness</p> <p>Category A: 2% of the inventory unit is comprised of the following ecological groups, which have less than five percent of their total area protected in the NWPS:</p> <ul style="list-style-type: none"> • <i>Inter-Mountain Basins Big Sagebrush Shrubland</i> <p>Category B: 4% of this inventory unit is comprised of ecological groups which have less than ten percent of their total area protected in the NWPS. Ecological groups in category B include:</p> <ul style="list-style-type: none"> • <i>Great Basin Foothill and Lower Montane Riparian Woodland and Shrubland</i> <p>Category C: 17% of the inventory unit is comprised of ecological groups which have less than twenty percent of their total area protected in the NWPS. Ecological groups in Category C include:</p> <ul style="list-style-type: none"> • <i>Great Basin Pinyon-Juniper Woodland</i> • <i>Rocky Mountain Aspen Forest and Woodland</i>

**Inyo NF Wilderness Inventory Areas
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	<p>Inyo NF representation: This inventory unit does not contain any ecological groups with less than twenty percent of their area on the Inyo NF in designated wilderness.</p>
<p>1108</p>	<p>General location: Owens Valley Escarpment Management Area Size: 2,100 acres adjacent to John Muir Wilderness</p> <p>Category A: Less than one percent of the inventory unit is comprised of the following ecological groups, which have less than five percent of their total area protected in the NWPS:</p> <ul style="list-style-type: none"> • <i>Inter-Mountain Basins Big Sagebrush Shrubland</i> <p>Category B: Less than one percent of this inventory unit is comprised of ecological groups which have less than ten percent of their total area protected in the NWPS. Ecological groups in category B include:</p> <ul style="list-style-type: none"> • <i>Great Basin Foothill and Lower Montane Riparian Woodland and Shrubland</i> <p>Category C: 5% of the inventory unit is comprised of ecological groups which have less than twenty percent of their total area protected in the NWPS. Ecological groups in Category C include:</p> <ul style="list-style-type: none"> • <i>Great Basin Pinyon-Juniper Woodland</i> • <i>Rocky Mountain Aspen Forest and Woodland</i> <p>Inyo NF representation: This inventory unit does not contain any ecological groups with less than twenty percent of their area on the Inyo NF in designated wilderness.</p>
<p>1109</p>	<p>General location: Owens Valley Escarpment Management Area Size: 1,319 acres adjacent to John Muir Wilderness</p> <p>Category A: 5% of the inventory unit is comprised of the following ecological groups, which have less than five percent of their total area protected in the NWPS:</p> <ul style="list-style-type: none"> • <i>Inter-Mountain Basins Big Sagebrush Shrubland</i> <p>Category B: 5% of this inventory unit is comprised of ecological groups which have less than ten percent of their total area protected in the NWPS. Ecological groups in category B include:</p> <ul style="list-style-type: none"> • <i>Great Basin Foothill and Lower Montane Riparian Woodland and Shrubland</i> <p>Category C: Ten percent of the inventory unit is comprised of ecological groups which have less than twenty percent of their total area protected in the NWPS. Ecological groups in Category C include:</p> <ul style="list-style-type: none"> • <i>Great Basin Pinyon-Juniper Woodland</i> • <i>Rocky Mountain Aspen Forest and Woodland</i>

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	<p>Inyo NF representation: This inventory unit does not contain any ecological groups with less than twenty percent of their area on the Inyo NF in designated wilderness.</p>
<p>1110</p>	<p>General location: Owens Valley Escarpment Management Area Size: 1,650 acres adjacent to John Muir Wilderness</p> <p>Category A: 2% of the inventory unit is comprised of the following ecological groups, which have less than five percent of their total area protected in the NWPS:</p> <ul style="list-style-type: none"> • <i>Inter-Mountain Basins Big Sagebrush Shrubland</i> • <i>Great Basin Xeric Mixed Sagebrush Shrubland</i> <p>Category B: 2% of this inventory unit is comprised of ecological groups which have less than ten percent of their total area protected in the NWPS. Ecological groups in category B include:</p> <ul style="list-style-type: none"> • <i>Great Basin Foothill and Lower Montane Riparian Woodland and Shrubland</i> <p>Category C: 6% of the inventory unit is comprised of ecological groups which have less than twenty percent of their total area protected in the NWPS. Ecological groups in Category C include:</p> <ul style="list-style-type: none"> • <i>Great Basin Pinyon-Juniper Woodland</i> • <i>Rocky Mountain Aspen Forest and Woodland</i> <p>Inyo NF representation: 7% of this inventory unit contains ecological groups with less than twenty percent of their area on the Inyo NF in designated wilderness.</p>
<p>1112</p>	<p>General location: Owens Valley Escarpment Management Area Size: 4,949 acres adjacent to John Muir Wilderness</p> <p>Category A: 33% of the inventory unit is comprised of the following ecological groups, which have less than five percent of their total area protected in the NWPS:</p> <ul style="list-style-type: none"> • <i>Great Basin Xeric Mixed Sagebrush Shrubland</i> • <i>Inter-Mountain Basins Big Sagebrush Shrubland</i> • <i>Inter-Mountain Basins Semi-Desert Shrub Steppe</i> • <i>Inter-Mountain Basins Mixed Salt Desert Scrub</i> <p>Category B: 35% of this inventory unit is comprised of ecological groups which have less than ten percent of their total area protected in the NWPS. Ecological groups in category B include:</p> <ul style="list-style-type: none"> • <i>Inter-Mountain Basins Montane Sagebrush Steppe</i> • <i>Great Basin Foothill and Lower Montane Riparian Woodland and Shrubland</i> <p>Category C: 46% of the inventory unit is comprised of ecological groups which</p>

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	<p>have less than twenty percent of their total area protected in the NWPS. Ecological groups in Category C include:</p> <ul style="list-style-type: none"> • <i>Great Basin Pinyon-Juniper Woodland</i> • <i>Rocky Mountain Aspen Forest and Woodland</i> <p>Inyo NF representation: 23% of the area of this inventory unit contains ecological groups with less than twenty percent of their area on the Inyo NF in designated wilderness.</p>
<p>1115</p>	<p>General location: Owens Valley Escarpment Management Area Size: 3,485 acres adjacent to John Muir Wilderness</p> <p>Category A: 82% of the inventory unit is comprised of the following ecological groups, which have less than five percent of their total area protected in the NWPS:</p> <ul style="list-style-type: none"> • <i>Great Basin Xeric Mixed Sagebrush Shrubland</i> • <i>Inter-Mountain Basins Big Sagebrush Shrubland</i> • <i>Inter-Mountain Basins Semi-Desert Shrub Steppe</i> • <i>Inter-Mountain Basins Mixed Salt Desert Scrub</i> <p>Category B: 84% of this inventory unit is comprised of ecological groups which have less than ten percent of their total area protected in the NWPS. Ecological groups in category B include:</p> <ul style="list-style-type: none"> • <i>Inter-Mountain Basins Montane Sagebrush Steppe</i> • <i>Great Basin Foothill and Lower Montane Riparian Woodland and Shrubland</i> <p>Category C: 100% of the inventory unit is comprised of ecological groups which have less than twenty percent of their total area protected in the NWPS. Ecological groups in Category C include:</p> <ul style="list-style-type: none"> • <i>Great Basin Pinyon-Juniper Woodland</i> <p>Inyo NF representation: 5% of the area of this inventory unit contains ecological groups with less than twenty percent of their area on the Inyo NF in designated wilderness.</p>
<p>1116</p>	<p>General location: Owens Valley Escarpment Management Area Size: 2,437 acres adjacent to John Muir Wilderness</p> <p>Category A: 55% of the inventory unit is comprised of the following ecological groups, which have less than five percent of their total area protected in the NWPS:</p> <ul style="list-style-type: none"> • <i>Great Basin Xeric Mixed Sagebrush Shrubland</i> • <i>Inter-Mountain Basins Big Sagebrush Shrubland</i> • <i>Inter-Mountain Basins Semi-Desert Shrub Steppe</i> • <i>Inter-Mountain Basins Mixed Salt Desert Scrub</i> <p>Category B: 61% of this inventory unit is comprised of ecological groups which</p>

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	<p>have less than ten percent of their total area protected in the NWPS. Ecological groups in category B include:</p> <ul style="list-style-type: none"> • <i>Inter-Mountain Basins Montane Sagebrush Steppe</i> • <i>Great Basin Foothill and Lower Montane Riparian Woodland and Shrubland</i> <p>Category C: 98% of the inventory unit is comprised of ecological groups which have less than twenty percent of their total area protected in the NWPS. Ecological groups in Category C include:</p> <ul style="list-style-type: none"> • <i>Great Basin Pinyon-Juniper Woodland</i> <p>Inyo NF representation: 2% of the area of this inventory unit contains ecological groups with less than twenty percent of their area on the Inyo NF in designated wilderness.</p>
<p>1140</p>	<p>General location: Coyote Management Area Size: 75,299 acres adjacent to the John Muir Wilderness</p> <p>Category A: 13% of the inventory unit is comprised of the following ecological groups, which have less than five percent of their total area protected in the NWPS:</p> <ul style="list-style-type: none"> • <i>Great Basin Xeric Mixed Sagebrush Shrubland</i> • <i>Inter-Mountain Basins Big Sagebrush Shrubland</i> • <i>Inter-Mountain Basins Semi-Desert Shrub Steppe</i> • <i>Inter-Mountain Basins Mixed Salt Desert Scrub</i> <p>Category B: 29% of this inventory unit is comprised of ecological groups which have less than ten percent of their total area protected in the NWPS. Ecological groups in category B include:</p> <ul style="list-style-type: none"> • <i>Inter-Mountain Basins Montane Sagebrush Steppe</i> • <i>Great Basin Foothill and Lower Montane Riparian Woodland and Shrubland</i> <p>Category C: 65% of the inventory unit is comprised of ecological groups which have less than twenty percent of their total area protected in the NWPS. Ecological groups in Category C include:</p> <ul style="list-style-type: none"> • <i>Great Basin Pinyon-Juniper Woodland</i> • <i>Rocky Mountain Aspen Forest and Woodland</i> <p>Inyo NF representation: 2% of the area of this inventory unit contains ecological groups with less than twenty percent of their area on the Inyo NF in designated wilderness.</p>
<p>1147</p>	<p>General location: Rock Creek-Pine Creek Management Area Size: 1,351 acres adjacent to John Muir Wilderness</p> <p>Category A: 22% of the inventory unit is comprised of the following ecological groups, which have less than five percent of their total area protected in the</p>

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	<p>NWPS:</p> <ul style="list-style-type: none"> • <i>Inter-Mountain Basins Big Sagebrush Shrubland</i> <p>Category B: None</p> <p>Category C: 37% of the inventory unit is comprised of ecological groups which have less than twenty percent of their total area protected in the NWPS. Ecological groups in Category C include:</p> <ul style="list-style-type: none"> • <i>Great Basin Pinyon-Juniper Woodland</i> • <i>Rocky Mountain Aspen Forest and Woodland</i> <p>Inyo NF representation: This inventory unit does not contain any ecological groups with less than twenty percent of their area on the Inyo NF in designated wilderness.</p>
<p>1148</p>	<p>General location: Rock Creek-Pine Creek Management Area Size: 1,756 acres adjacent to John Muir Wilderness</p> <p>Category A: 7% of the inventory unit is comprised of the following ecological groups, which have less than five percent of their total area protected in the NWPS:</p> <ul style="list-style-type: none"> • <i>Inter-Mountain Basins Big Sagebrush Shrubland</i> <p>Category B: 8% of this inventory unit is comprised of ecological groups which have less than ten percent of their total area protected in the NWPS. Ecological groups in category B include:</p> <ul style="list-style-type: none"> • <i>Great Basin Foothill and Lower Montane Riparian Woodland and Shrubland</i> <p>Category C: 19% of the inventory unit is comprised of ecological groups which have less than twenty percent of their total area protected in the NWPS. Ecological groups in Category C include:</p> <ul style="list-style-type: none"> • <i>Great Basin Pinyon-Juniper Woodland</i> • <i>Rocky Mountain Aspen Forest and Woodland</i> <p>Inyo NF representation: This inventory unit does not contain any ecological groups with less than twenty percent of their area on the Inyo NF in designated wilderness.</p>
<p>1154</p>	<p>General location: Rock Creek-Pine Creek Management Area Size: 5,243 acres adjacent to John Muir Wilderness</p> <p>Category A: 8% of the inventory unit is comprised of the following ecological groups, which have less than five percent of their total area protected in the NWPS:</p> <ul style="list-style-type: none"> • <i>Inter-Mountain Basins Big Sagebrush Shrubland</i> • <i>Inter-Mountain Basins Mixed Salt Desert Scrub</i> <p>Category B: 10% of this inventory unit is comprised of ecological groups which have less than ten percent of their total area protected in the NWPS. Ecological</p>

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	<p>groups in category B include:</p> <ul style="list-style-type: none"> • <i>Great Basin Foothill and Lower Montane Riparian Woodland and Shrubland</i> <p>Category C: 54% of the inventory unit is comprised of ecological groups which have less than twenty percent of their total area protected in the NWPS. Ecological groups in Category C include:</p> <ul style="list-style-type: none"> • <i>Great Basin Pinyon-Juniper Woodland</i> • <i>Rocky Mountain Aspen Forest and Woodland</i> <p>Inyo NF representation: This inventory unit does not contain any ecological groups with less than twenty percent of their area on the Inyo NF in designated wilderness.</p>
<p>1155</p>	<p>General location: Rock Creek-Pine Creek Management Area Size: 3,498 acres adjacent to John Muir Wilderness</p> <p>Category A: 1% of the inventory unit is comprised of the following ecological groups, which have less than five percent of their total area protected in the NWPS:</p> <ul style="list-style-type: none"> • <i>Inter-Mountain Basins Big Sagebrush Shrubland</i> <p>Category B: 3% of this inventory unit is comprised of ecological groups which have less than ten percent of their total area protected in the NWPS. Ecological groups in category B include:</p> <ul style="list-style-type: none"> • <i>Great Basin Foothill and Lower Montane Riparian Woodland and Shrubland</i> <p>Category C: 35% of the inventory unit is comprised of ecological groups which have less than twenty percent of their total area protected in the NWPS. Ecological groups in Category C include:</p> <ul style="list-style-type: none"> • <i>Great Basin Pinyon-Juniper Woodland</i> • <i>Rocky Mountain Aspen Forest and Woodland</i> <p>Inyo NF representation: This inventory unit does not contain any ecological groups with less than twenty percent of their area on the Inyo NF in designated wilderness.</p>
<p>1156</p>	<p>General location: Convict-McGee Management Area Size: 5,129 acres adjacent to John Muir Wilderness</p> <p>Category A: 22% of the inventory unit is comprised of the following ecological groups, which have less than five percent of their total area protected in the NWPS:</p> <ul style="list-style-type: none"> • <i>Inter-Mountain Basins Big Sagebrush Shrubland</i> <p>Category B: 24% percent of this inventory unit is comprised of ecological groups which have less than ten percent of their total area protected in the NWPS. Ecological groups in category B include:</p>

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	<ul style="list-style-type: none"> • <i>Great Basin Foothill and Lower Montane Riparian Woodland and Shrubland</i> <p>Category C: 57% of the inventory unit is comprised of ecological groups which have less than twenty percent of their total area protected in the NWPS. Ecological groups in Category C include:</p> <ul style="list-style-type: none"> • <i>Great Basin Pinyon-Juniper Woodland</i> • <i>Rocky Mountain Aspen Forest and Woodland</i> <p>Inyo NF representation: This inventory unit does not contain any ecological groups with less than twenty percent of their area on the Inyo NF in designated wilderness.</p>
1159	<p>General location: Mammoth Escarpment Management Area Size: 14,833 acres adjacent to John Muir Wilderness</p> <p>Category A: 11% of the inventory unit is comprised of the following ecological groups, which have less than five percent of their total area protected in the NWPS:</p> <ul style="list-style-type: none"> • <i>Inter-Mountain Basins Big Sagebrush Shrubland</i> <p>Category B: 11% of this inventory unit is comprised of ecological groups which have less than ten percent of their total area protected in the NWPS. Ecological groups in category B include:</p> <ul style="list-style-type: none"> • <i>Great Basin Foothill and Lower Montane Riparian Woodland and Shrubland</i> <p>Category C: 27% of the inventory unit is comprised of ecological groups which have less than twenty percent of their total area protected in the NWPS. Ecological groups in Category C include:</p> <ul style="list-style-type: none"> • <i>Great Basin Pinyon-Juniper Woodland</i> • <i>Rocky Mountain Aspen Forest and Woodland</i> <p>Inyo NF representation: This inventory unit does not contain any ecological groups with less than twenty percent of their area on the Inyo NF in designated wilderness.</p>
1161	<p>General location: Reds Meadow-Fish Creek Management Area Size: 1,656 acres adjacent to Ansel Adams Wilderness</p> <p>Category A and B: Almost none of this area is comprised of ecosystems which have less than ten percent of their total area protected in the National Wilderness Preservation System:</p> <p>Category C: 2% of the inventory unit is comprised of ecological groups which have less than twenty percent of their total area protected in the NWPS. Ecological groups in Category C include:</p> <ul style="list-style-type: none"> • <i>Great Basin Pinyon-Juniper Woodland</i> • <i>Rocky Mountain Aspen Forest and Woodland</i>

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	<p>Inyo NF representation: This inventory unit does not contain any ecological groups with less than twenty percent of their area on the Inyo NF in designated wilderness.</p>
1164	<p>General location: Reds Meadow-Fish Creek Management Area Size: 1,017 acres adjacent to Ansel Adams Wilderness</p> <p>Categories A, B and C: Almost none of this area is comprised of ecosystems which have less than ten percent of their total area protected in the National Wilderness Preservation System:</p> <p>Inyo NF representation: This inventory unit does not contain any ecological groups with less than twenty percent of their area on the Inyo NF in designated wilderness.</p>
1179	<p>General location: Walker-Parker Management Area Size: 7,212 acres adjacent to Ansel Adams Wilderness</p> <p>Category A: 10% of the inventory unit is comprised of the following ecological groups, which have less than five percent of their total area protected in the NWPS:</p> <ul style="list-style-type: none"> • <i>Inter-Mountain Basins Big Sagebrush Shrubland</i> <p>Category B: 10% of this inventory unit is comprised of ecological groups which have less than ten percent of their total area protected in the NWPS. Ecological groups in category B include:</p> <ul style="list-style-type: none"> • <i>Great Basin Foothill and Lower Montane Riparian Woodland and Shrubland</i> <p>Category C: 51% of the inventory unit is comprised of ecological groups which have less than twenty percent of their total area protected in the NWPS. Ecological groups in Category C include:</p> <ul style="list-style-type: none"> • <i>Great Basin Pinyon-Juniper Woodland</i> • <i>Rocky Mountain Aspen Forest and Woodland</i> <p>Inyo NF representation: This inventory unit does not contain any ecological groups with less than twenty percent of their area on the Inyo NF in designated wilderness.</p>
1195	<p>General location: Mono Basin Management Area Size: 2,008 acres adjacent to Ansel Adams Wilderness</p> <p>Category A: 21% of the inventory unit is comprised of the following ecological groups, which have less than five percent of their total area protected in the NWPS:</p> <ul style="list-style-type: none"> • <i>Inter-Mountain Basins Big Sagebrush Shrubland</i> <p>Category B: none</p> <p>Category C: 68% of the inventory unit is comprised of ecological groups which</p>

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	<p>have less than twenty percent of their total area protected in the NWPS. Ecological groups in Category C include:</p> <ul style="list-style-type: none"> • <i>Great Basin Pinyon-Juniper Woodland</i> • <i>Rocky Mountain Aspen Forest and Woodland</i> <p>Inyo NF representation: This inventory unit does not contain any ecological groups with less than twenty percent of their area on the Inyo NF in designated wilderness.</p>
<p>1208</p>	<p>General location: Lee Vining Management Area Size: 2,516 acres adjacent to Ansel Adams Wilderness</p> <p>Category A: 1% of the inventory unit is comprised of the following ecological groups, which have less than five percent of their total area protected in the NWPS:</p> <ul style="list-style-type: none"> • <i>Inter-Mountain Basins Big Sagebrush Shrubland</i> <p>Category B: none</p> <p>Category C: 2% of the inventory unit is comprised of ecological groups which have less than twenty percent of their total area protected in the NWPS. Ecological groups in Category C include:</p> <ul style="list-style-type: none"> • <i>Great Basin Pinyon-Juniper Woodland</i> • <i>Rocky Mountain Aspen Forest and Woodland</i> <p>Inyo NF representation: This inventory unit does not contain any ecological groups with less than twenty percent of their area on the Inyo NF in designated wilderness.</p>
<p>1211</p>	<p>General location: Lee Vining Management Area Size: 1,949 acres adjacent to Ansel Adams Wilderness</p> <p>Category A: 4% of the inventory unit is comprised of the following ecological groups, which have less than five percent of their total area protected in the NWPS:</p> <ul style="list-style-type: none"> • <i>Inter-Mountain Basins Big Sagebrush Shrubland</i> <p>Category B: 4% of this inventory unit is comprised of ecological groups which have less than ten percent of their total area protected in the NWPS. Ecological groups in category B include:</p> <ul style="list-style-type: none"> • <i>Great Basin Foothill and Lower Montane Riparian Woodland and Shrubland</i> <p>Category C: 34% of the inventory unit is comprised of ecological groups which have less than twenty percent of their total area protected in the NWPS. Ecological groups in Category C include:</p> <ul style="list-style-type: none"> • <i>Great Basin Pinyon-Juniper Woodland</i> • <i>Rocky Mountain Aspen Forest and Woodland</i> <p>Inyo NF representation: This inventory unit does not contain any ecological</p>

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	groups with less than twenty percent of their area on the Inyo NF in designated wilderness.
1232	<p>General location: Inyo Mountains Management Area Size: 3,205 acres adjacent to South Sierra Wilderness</p> <p>Categories A and B: Almost none of this area is comprised of ecosystems which have less than ten percent of their total area protected in the National Wilderness Preservation System.</p> <p>Category C: 9% of the inventory unit is comprised of ecological groups which have less than twenty percent of their total area protected in the NWPS. Ecological groups in Category C include:</p> <ul style="list-style-type: none"> • <i>Great Basin Pinyon-Juniper Woodland</i> <p>Inyo NF representation: This inventory unit does not contain any ecological groups with less than twenty percent of their area on the Inyo NF in designated wilderness.</p>
1236	<p>General location: Inyo Mountains Management Area Size: 73,178 acres; a portion is adjacent to the Inyo Mountains Wilderness</p> <p>Category A: 32% of the inventory unit is comprised of the following ecological groups, which have less than five percent of their total area protected in the NWPS:</p> <ul style="list-style-type: none"> • <i>Great Basin Xeric Mixed Sagebrush Shrubland</i> • <i>Inter-Mountain Basins Big Sagebrush Shrubland</i> • <i>Inter-Mountain Basins Semi-Desert Shrub Steppe</i> • <i>Inter-Mountain Basins Mixed Salt Desert Scrub</i> <p>Category B: 44% of this inventory unit is comprised of ecological groups which have less than ten percent of their total area protected in the NWPS. Ecological groups in category B include:</p> <ul style="list-style-type: none"> • <i>Inter-Mountain Basins Montane Sagebrush Steppe</i> • <i>Great Basin Foothill and Lower Montane Riparian Woodland and Shrubland</i> <p>Category C: 80% of the inventory unit is comprised of ecological groups which have less than twenty percent of their total area protected in the NWPS. Ecological groups in Category C include:</p> <ul style="list-style-type: none"> • <i>Great Basin Pinyon-Juniper Woodland</i> <p>Inyo NF representation: 7% of the area of this inventory unit contains ecological groups with less than twenty percent of their area on the Inyo NF in designated wilderness.</p>
1242	<p>General location: White Mountains Management Area Size: 10,084 acres</p>

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	<p>Category A: 8% of the inventory unit is comprised of the following ecological groups, which have less than five percent of their total area protected in the NWPS:</p> <ul style="list-style-type: none"> • <i>Inter-Mountain Basins Big Sagebrush Shrubland</i> • <i>Inter-Mountain Basins Montane Sagebrush Steppe</i> <p>Category B: 14% of this inventory unit is comprised of ecological groups which have less than ten percent of their total area protected in the NWPS. Ecological groups in category B include:</p> <ul style="list-style-type: none"> • <i>Inter-Mountain Basins Montane Sagebrush Steppe</i> <p>Category C: 25% of the inventory unit is comprised of ecological groups which have less than twenty percent of their total area protected in the NWPS. Ecological groups in Category C include:</p> <ul style="list-style-type: none"> • <i>Great Basin Pinyon-Juniper Woodland</i> <p>Inyo NF representation: Less than one percent of the area of this inventory unit contains ecological groups with less than twenty percent of their area on the Inyo NF in designated wilderness.</p>
1246	<p>General location: White Mountains Management Area Size: 43,230 acres</p> <p>Category A: 43% percent of the inventory unit is comprised of the following ecological groups, which have less than five percent of their total area protected in the NWPS:</p> <ul style="list-style-type: none"> • <i>Great Basin Xeric Mixed Sagebrush Shrubland</i> • <i>Inter-Mountain Basins Big Sagebrush Shrubland</i> • <i>Inter-Mountain Basins Semi-Desert Shrub Steppe</i> • <i>Inter-Mountain Basins Mixed Salt Desert Scrub</i> <p>Category B: 48% of this inventory unit is comprised of ecological groups which have less than ten percent of their total area protected in the NWPS. Ecological groups in category B include:</p> <ul style="list-style-type: none"> • <i>Inter-Mountain Basins Montane Sagebrush Steppe</i> • <i>Great Basin Foothill and Lower Montane Riparian Woodland and Shrubland</i> <p>Category C: 96% of the inventory unit is comprised of ecological groups which have less than twenty percent of their total area protected in the NWPS. Ecological groups in Category C include:</p> <ul style="list-style-type: none"> • <i>Great Basin Pinyon-Juniper Woodland</i> <p>Inyo NF representation: 8% of the area of this inventory unit contains ecological groups with less than twenty percent of their area on the Inyo NF in designated wilderness.</p>

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1248	<p>General location: White Mountains Management Area Size: 38,756 acres</p> <p>Category A: 31% of the inventory unit is comprised of the following ecological groups, which have less than five percent of their total area protected in the NWPS:</p> <ul style="list-style-type: none"> • <i>Great Basin Xeric Mixed Sagebrush Shrubland</i> • <i>Inter-Mountain Basins Big Sagebrush Shrubland</i> • <i>Inter-Mountain Basins Semi-Desert Shrub Steppe</i> • <i>Inter-Mountain Basins Mixed Salt Desert Scrub</i> <p>Category B: 41% of this inventory unit is comprised of ecological groups which have less than ten percent of their total area protected in the NWPS. Ecological groups in category B include:</p> <ul style="list-style-type: none"> • <i>Inter-Mountain Basins Montane Sagebrush Steppe</i> • <i>Great Basin Foothill and Lower Montane Riparian Woodland and Shrubland</i> <p>Category C: 93% of the inventory unit is comprised of ecological groups which have less than twenty percent of their total area protected in the NWPS. Ecological groups in Category C include:</p> <ul style="list-style-type: none"> • <i>Great Basin Pinyon-Juniper Woodland</i> <p>Inyo NF representation: 6% of the area of this inventory unit contains ecological groups with less than twenty percent of their area on the Inyo NF in designated wilderness.</p>
1258	<p>General location: White Mountains Management Area Size: 35,248 acres</p> <p>Category A: 18% of the inventory unit is comprised of the following ecological groups, which have less than five percent of their total area protected in the NWPS:</p> <ul style="list-style-type: none"> • <i>Great Basin Xeric Mixed Sagebrush Shrubland</i> • <i>Inter-Mountain Basins Big Sagebrush Shrubland</i> • <i>Inter-Mountain Basins Semi-Desert Shrub Steppe</i> • <i>Inter-Mountain Basins Mixed Salt Desert Scrub</i> <p>Category B: 35% of this inventory unit is comprised of ecological groups which have less than ten percent of their total area protected in the NWPS. Ecological groups in category B include:</p> <ul style="list-style-type: none"> • <i>Inter-Mountain Basins Montane Sagebrush Steppe</i> • <i>Great Basin Foothill and Lower Montane Riparian Woodland and Shrubland</i> <p>Category C: 84% of the inventory unit is comprised of ecological groups which</p>

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	<p>have less than twenty percent of their total area protected in the NWPS. Ecological groups in Category C include:</p> <ul style="list-style-type: none"> • <i>Great Basin Pinyon-Juniper Woodland</i> <p>Inyo NF representation: 3% of the area of this inventory unit contains ecological groups with less than twenty percent of their area on the Inyo NF in designated wilderness.</p>
<p>1275</p>	<p>General location: White Mountains Management Area Size: 10,435 acres adjacent to White Mountains Wilderness</p> <p>Category A: 33% of the inventory unit is comprised of the following ecological groups, which have less than five percent of their total area protected in the NWPS:</p> <ul style="list-style-type: none"> • <i>Great Basin Xeric Mixed Sagebrush Shrubland</i> • <i>Inter-Mountain Basins Big Sagebrush Shrubland</i> • <i>Inter-Mountain Basins Semi-Desert Shrub Steppe</i> • <i>Inter-Mountain Basins Mixed Salt Desert Scrub</i> <p>Category B: 59% of this inventory unit is comprised of ecological groups which have less than ten percent of their total area protected in the NWPS. Ecological groups in category B include:</p> <ul style="list-style-type: none"> • <i>Inter-Mountain Basins Montane Sagebrush Steppe</i> • <i>Great Basin Foothill and Lower Montane Riparian Woodland and Shrubland</i> <p>Category C: 90% of the inventory unit is comprised of ecological groups which have less than twenty percent of their total area protected in the NWPS. Ecological groups in Category C include:</p> <ul style="list-style-type: none"> • <i>Great Basin Pinyon-Juniper Woodland</i> <p>Inyo NF representation: 7% of the area of this inventory unit contains ecological groups with less than twenty percent of their area on the Inyo NF in designated wilderness.</p>
<p>1276</p>	<p>General location: White Mountains Management Area Size: 1,048 acres adjacent to White Mountains Wilderness</p> <p>Category A: 67% of the inventory unit is comprised of the following ecological groups, which have less than five percent of their total area protected in the NWPS:</p> <ul style="list-style-type: none"> • <i>Great Basin Xeric Mixed Sagebrush Shrubland</i> • <i>Inter-Mountain Basins Big Sagebrush Shrubland</i> • <i>Inter-Mountain Basins Semi-Desert Shrub Steppe</i> • <i>Inter-Mountain Basins Mixed Salt Desert Scrub</i> <p>Category B: 73% of this inventory unit is comprised of ecological groups which have less than ten percent of their total area protected in the NWPS. Ecological</p>

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	<p>groups in category B include:</p> <ul style="list-style-type: none"> • <i>Inter-Mountain Basins Montane Sagebrush Steppe</i> • <i>Great Basin Foothill and Lower Montane Riparian Woodland and Shrubland</i> <p>Category C: 92% of the inventory unit is comprised of ecological groups which have less than twenty percent of their total area protected in the NWPS. Ecological groups in Category C include:</p> <ul style="list-style-type: none"> • <i>Great Basin Pinyon-Juniper Woodland</i> <p>Inyo NF representation: 21% of the area of this inventory unit contains ecological groups with less than twenty percent of their area on the Inyo NF in designated wilderness.</p>
<p>1281</p>	<p>General location: White Mountains Management Area Size: 11,210 acres adjacent to White Mountains Wilderness</p> <p>Category A: 5% of the inventory unit is comprised of the following ecological groups, which have less than five percent of their total area protected in the NWPS:</p> <ul style="list-style-type: none"> • <i>Inter-Mountain Basins Big Sagebrush Shrubland</i> • <i>Inter-Mountain Basins Mixed Salt Desert Scrub</i> • <i>Great Basin Xeric Mixed Sagebrush Shrubland</i> <p>Category B: 31% of this inventory unit is comprised of ecological groups which have less than ten percent of their total area protected in the NWPS. Ecological groups in category B include:</p> <ul style="list-style-type: none"> • <i>Inter-Mountain Basins Montane Sagebrush Steppe</i> • <i>Great Basin Foothill and Lower Montane Riparian Woodland and Shrubland</i> <p>Category C: 87% of the inventory unit is comprised of ecological groups which have less than twenty percent of their total area protected in the NWPS. Ecological groups in Category C include:</p> <ul style="list-style-type: none"> • <i>Great Basin Pinyon-Juniper Woodland</i> <p>Inyo NF representation: Less than one percent of the area of this inventory unit contains ecological groups with less than twenty percent of their area on the Inyo NF in designated wilderness.</p>
<p>1295</p>	<p>General location: White Mountains Management Area Size: 2,065 acres adjacent to White Mountains Wilderness</p> <p>Category A: 14% of the inventory unit is comprised of the following ecological groups, which have less than five percent of their total area protected in the NWPS:</p> <ul style="list-style-type: none"> • <i>Inter-Mountain Basins Big Sagebrush Shrubland</i> • <i>Great Basin Xeric Mixed Sagebrush Shrubland</i>

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	<p>Category B: 16% of this inventory unit is comprised of ecological groups which have less than ten percent of their total area protected in the NWPS. Ecological groups in category B include:</p> <ul style="list-style-type: none"> • <i>Inter-Mountain Basins Montane Sagebrush Steppe</i> <p>Category C: 20% of the inventory unit is comprised of ecological groups which have less than twenty percent of their total area protected in the NWPS. Ecological groups in Category C include:</p> <ul style="list-style-type: none"> • <i>Great Basin Pinyon-Juniper Woodland</i> <p>Inyo NF representation: 5% of the area of this inventory unit contains ecological groups with less than twenty percent of their area on the Inyo NF in designated wilderness.</p>
<p>1297</p>	<p>General location: White Mountains Management Area Size: 1,092 acres adjacent to White Mountains Wilderness</p> <p>Category A: 81% of the inventory unit is comprised of the following ecological groups, which have less than five percent of their total area protected in the NWPS:</p> <ul style="list-style-type: none"> • <i>Great Basin Xeric Mixed Sagebrush Shrubland</i> • <i>Inter-Mountain Basins Big Sagebrush Shrubland</i> • <i>Inter-Mountain Basins Semi-Desert Shrub Steppe</i> • <i>Inter-Mountain Basins Mixed Salt Desert Scrub</i> <p>Category B: 83% of this inventory unit is comprised of ecological groups which have less than ten percent of their total area protected in the NWPS. Ecological groups in category B include:</p> <ul style="list-style-type: none"> • <i>Inter-Mountain Basins Montane Sagebrush Steppe</i> • <i>Great Basin Foothill and Lower Montane Riparian Woodland and Shrubland</i> <p>Category C: 92% of the inventory unit is comprised of ecological groups which have less than twenty percent of their total area protected in the NWPS. Ecological groups in Category C include:</p> <ul style="list-style-type: none"> • <i>Great Basin Pinyon-Juniper Woodland</i> <p>Inyo NF representation: 26% of the area of this inventory unit contains ecological groups with less than twenty percent of their area on the Inyo NF in designated wilderness.</p>
<p>1301</p>	<p>General location: White Mountains Management Area Size: 3,010 acres adjacent to White Mountains Wilderness</p> <p>Category A: 71% of the inventory unit is comprised of the following ecological groups, which have less than five percent of their total area protected in the NWPS:</p>

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	<ul style="list-style-type: none"> • <i>Great Basin Xeric Mixed Sagebrush Shrubland</i> • <i>Inter-Mountain Basins Big Sagebrush Shrubland</i> • <i>Inter-Mountain Basins Semi-Desert Shrub Steppe</i> • <i>Inter-Mountain Basins Mixed Salt Desert Scrub</i> <p>Category B: 74% of this inventory unit is comprised of ecological groups which have less than ten percent of their total area protected in the NWPS. Ecological groups in category B include:</p> <ul style="list-style-type: none"> • <i>Inter-Mountain Basins Montane Sagebrush Steppe</i> <p>Category C: 96% of the inventory unit is comprised of ecological groups which have less than twenty percent of their total area protected in the NWPS. Ecological groups in Category C include:</p> <ul style="list-style-type: none"> • <i>Great Basin Pinyon-Juniper Woodland</i> <p>Inyo NF representation: 17% of the area of this inventory unit contains ecological groups with less than twenty percent of their area on the Inyo NF in designated wilderness.</p>
1308	<p>General location: White Mountains Management Area Size: 13,886 acres adjacent to White Mountains Wilderness</p> <p>Category A: 70% of the inventory unit is comprised of the following ecological groups, which have less than five percent of their total area protected in the NWPS:</p> <ul style="list-style-type: none"> • <i>Great Basin Xeric Mixed Sagebrush Shrubland</i> • <i>Inter-Mountain Basins Big Sagebrush Shrubland</i> • <i>Inter-Mountain Basins Semi-Desert Shrub Steppe</i> • <i>Inter-Mountain Basins Mixed Salt Desert Scrub</i> <p>Category B: 76% of this inventory unit is comprised of ecological groups which have less than ten percent of their total area protected in the NWPS. Ecological groups in category B include:</p> <ul style="list-style-type: none"> • <i>Inter-Mountain Basins Montane Sagebrush Steppe</i> • <i>Great Basin Foothill and Lower Montane Riparian Woodland and Shrubland</i> <p>Category C: 98% of the inventory unit is comprised of ecological groups which have less than twenty percent of their total area protected in the NWPS. Ecological groups in Category C include:</p> <ul style="list-style-type: none"> • <i>Great Basin Pinyon-Juniper Woodland</i> <p>Inyo NF representation: 23% of the area of this inventory unit contains ecological groups with less than twenty percent of their area on the Inyo NF in designated wilderness.</p>

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1311	<p>General location: White Mountains Management Area Size: 11,214 acres adjacent to Boundary Peak and White Mountains Wilderness</p> <p>Category A: 17% of the inventory unit is comprised of the following ecological groups, which have less than five percent of their total area protected in the NWPS:</p> <ul style="list-style-type: none"> • <i>Great Basin Xeric Mixed Sagebrush Shrubland</i> • <i>Inter-Mountain Basins Big Sagebrush Shrubland</i> • <i>Inter-Mountain Basins Semi-Desert Shrub Steppe</i> • <i>Inter-Mountain Basins Mixed Salt Desert Scrub</i> <p>Category B: 37% of this inventory unit is comprised of ecological groups which have less than ten percent of their total area protected in the NWPS. Ecological groups in category B include:</p> <ul style="list-style-type: none"> • <i>Inter-Mountain Basins Montane Sagebrush Steppe</i> • <i>Great Basin Foothill and Lower Montane Riparian Woodland and Shrubland</i> <p>Category C: 75% of the inventory unit is comprised of ecological groups which have less than twenty percent of their total area protected in the NWPS. Ecological groups in Category C include:</p> <ul style="list-style-type: none"> • <i>Great Basin Pinyon-Juniper Woodland</i> <p>Inyo NF representation: 4% of the area of this inventory unit contains ecological groups with less than twenty percent of their area on the Inyo NF in designated wilderness.</p>
1312	<p>General location: White Mountains Management Area Size: 8,133 acres adjacent to Boundary Peak Wilderness (comprised of three sub-areas)</p> <p>Category A: 5% of the inventory unit is comprised of the following ecological groups, which have less than five percent of their total area protected in the NWPS:</p> <ul style="list-style-type: none"> • <i>Inter-Mountain Basins Big Sagebrush Shrubland</i> • <i>Great Basin Xeric Mixed Sagebrush Shrubland</i> <p>Category B: 29% of this inventory unit is comprised of ecological groups which have less than ten percent of their total area protected in the NWPS. Ecological groups in category B include:</p> <ul style="list-style-type: none"> • <i>Inter-Mountain Basins Montane Sagebrush Steppe</i> <p>Category C: 72% of the inventory unit is comprised of ecological groups which have less than twenty percent of their total area protected in the NWPS. Ecological groups in Category C include:</p> <ul style="list-style-type: none"> • <i>Great Basin Pinyon-Juniper Woodland</i>

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	<p>Inyo NF representation: Less than one percent of the area of this inventory unit contains ecological groups with less than twenty percent of their area on the Inyo NF in designated wilderness.</p>
<p>1326</p>	<p>General location: White Mountains Management Area Size: 5,464 acres</p> <p>Category A: 25% percent of the inventory unit is comprised of the following ecological groups, which have less than five percent of their total area protected in the NWPS:</p> <ul style="list-style-type: none"> • <i>Great Basin Xeric Mixed Sagebrush Shrubland</i> • <i>Inter-Mountain Basins Big Sagebrush Shrubland</i> • <i>Inter-Mountain Basins Semi-Desert Shrub Steppe</i> • <i>Inter-Mountain Basins Mixed Salt Desert Scrub</i> <p>Category B: 37% of this inventory unit is comprised of ecological groups which have less than ten percent of their total area protected in the NWPS. Ecological groups in category B include:</p> <ul style="list-style-type: none"> • <i>Inter-Mountain Basins Montane Sagebrush Steppe</i> <p>Category C: 92% of the inventory unit is comprised of ecological groups which have less than twenty percent of their total area protected in the NWPS. Ecological groups in Category C include:</p> <ul style="list-style-type: none"> • <i>Great Basin Pinyon-Juniper Woodland</i> <p>Inyo NF representation: 4% of the area of this inventory unit contains ecological groups with less than twenty percent of their area on the Inyo NF in designated wilderness.</p>
<p>1332</p>	<p>General location: Pizona Management Area Size: 5,254 acres</p> <p>Category A: 41% of the inventory unit is comprised of the following ecological groups, which have less than five percent of their total area protected in the NWPS:</p> <ul style="list-style-type: none"> • <i>Great Basin Xeric Mixed Sagebrush Shrubland</i> • <i>Inter-Mountain Basins Big Sagebrush Shrubland</i> • <i>Inter-Mountain Basins Semi-Desert Shrub Steppe</i> • <i>Inter-Mountain Basins Mixed Salt Desert Scrub</i> <p>Category B: 44% of this inventory unit is comprised of ecological groups which have less than ten percent of their total area protected in the NWPS. Ecological groups in category B include:</p> <ul style="list-style-type: none"> • <i>Inter-Mountain Basins Montane Sagebrush Steppe</i> • <i>Great Basin Foothill and Lower Montane Riparian Woodland and Shrubland</i>

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	<p>Category C: 98% of the inventory unit is comprised of ecological groups which have less than twenty percent of their total area protected in the NWPS. Ecological groups in Category C include:</p> <ul style="list-style-type: none"> • <i>Great Basin Pinyon-Juniper Woodland</i> <p>Inyo NF representation: 4% of the area of this inventory unit contains ecological groups with less than twenty percent of their area on the Inyo NF in designated wilderness.</p>
<p>1339</p>	<p>General location: Pizona Management Area Size: 19,826 acres</p> <p>Category A: 28% of the inventory unit is comprised of the following ecological groups, which have less than five percent of their total area protected in the NWPS:</p> <ul style="list-style-type: none"> • <i>Great Basin Xeric Mixed Sagebrush Shrubland</i> • <i>Inter-Mountain Basins Big Sagebrush Shrubland</i> • <i>Inter-Mountain Basins Semi-Desert Shrub Steppe</i> • <i>Inter-Mountain Basins Mixed Salt Desert Scrub</i> <p>Category B: 35% of this inventory unit is comprised of ecological groups which have less than ten percent of their total area protected in the NWPS. Ecological groups in category B include:</p> <ul style="list-style-type: none"> • <i>Inter-Mountain Basins Montane Sagebrush Steppe</i> <p>Category C: 99% of the inventory unit is comprised of ecological groups which have less than twenty percent of their total area protected in the NWPS. Ecological groups in Category C include:</p> <ul style="list-style-type: none"> • <i>Great Basin Pinyon-Juniper Woodland</i> <p>Inyo NF representation: 1% of the area of this inventory unit contains ecological groups with less than twenty percent of their area on the Inyo NF in designated wilderness.</p>
<p>1342</p>	<p>General location: White Mountains Management Area Size: 6,144 acres</p> <p>Category A: 31% of the inventory unit is comprised of the following ecological groups, which have less than five percent of their total area protected in the NWPS:</p> <ul style="list-style-type: none"> • <i>Great Basin Xeric Mixed Sagebrush Shrubland</i> • <i>Inter-Mountain Basins Big Sagebrush Shrubland</i> • <i>Inter-Mountain Basins Semi-Desert Shrub Steppe</i> • <i>Inter-Mountain Basins Mixed Salt Desert Scrub</i> <p>Category B: 35% of this inventory unit is comprised of ecological groups which have less than ten percent of their total area protected in the NWPS. Ecological</p>

**Inyo NF Wilderness Inventory Areas
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	<p>groups in category B include:</p> <ul style="list-style-type: none"> • <i>Inter-Mountain Basins Montane Sagebrush Steppe</i> <p>Category C: 90% of the inventory unit is comprised of ecological groups which have less than twenty percent of their total area protected in the NWPS. Ecological groups in Category C include:</p> <ul style="list-style-type: none"> • <i>Great Basin Pinyon-Juniper Woodland</i> <p>Inyo NF representation: 2% of the area of this inventory unit contains ecological groups with less than twenty percent of their area on the Inyo NF in designated wilderness.</p>
<p>1355</p>	<p>General location: Pizona Management Area Size: 10,297 acres</p> <p>Category A: 30% of the inventory unit is comprised of the following ecological groups, which have less than five percent of their total area protected in the NWPS:</p> <ul style="list-style-type: none"> • <i>Great Basin Xeric Mixed Sagebrush Shrubland</i> • <i>Inter-Mountain Basins Big Sagebrush Shrubland</i> • <i>Inter-Mountain Basins Semi-Desert Shrub Steppe</i> • <i>Inter-Mountain Basins Mixed Salt Desert Scrub</i> <p>Category B: 31% of this inventory unit is comprised of ecological groups which have less than ten percent of their total area protected in the NWPS. Ecological groups in category B include:</p> <ul style="list-style-type: none"> • <i>Inter-Mountain Basins Montane Sagebrush Steppe</i> <p>Category C: 100% of the inventory unit is comprised of ecological groups which have less than twenty percent of their total area protected in the NWPS. Ecological groups in Category C include:</p> <ul style="list-style-type: none"> • <i>Great Basin Pinyon-Juniper Woodland</i> <p>Inyo NF representation: Less than one percent of the area of this inventory unit contains ecological groups with less than twenty percent of their area on the Inyo NF in designated wilderness.</p>
<p>1357</p>	<p>General location: Pizona Management Area Size: 5,805 acres</p> <p>Category A: 52% of the inventory unit is comprised of the following ecological groups, which have less than five percent of their total area protected in the NWPS:</p> <ul style="list-style-type: none"> • <i>Great Basin Xeric Mixed Sagebrush Shrubland</i> • <i>Inter-Mountain Basins Big Sagebrush Shrubland</i> • <i>Inter-Mountain Basins Semi-Desert Shrub Steppe</i> • <i>Inter-Mountain Basins Mixed Salt Desert Scrub</i>

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	<p>Category B: 52% of this inventory unit is comprised of ecological groups which have less than ten percent of their total area protected in the NWPS. Ecological groups in category B include:</p> <ul style="list-style-type: none"> • <i>Inter-Mountain Basins Montane Sagebrush Steppe</i> <p>Category C: 100% of the inventory unit is comprised of ecological groups which have less than twenty percent of their total area protected in the NWPS. Ecological groups in Category C include:</p> <ul style="list-style-type: none"> • <i>Great Basin Pinyon-Juniper Woodland</i> <p>Inyo NF representation: Less than one percent of the area of this inventory unit contains ecological groups with less than twenty percent of their area on the Inyo NF in designated wilderness.</p>
1361	<p>General location: Pizona Management Area Size: 8,855 acres</p> <p>Category A: 34% of the inventory unit is comprised of the following ecological groups, which have less than five percent of their total area protected in the NWPS:</p> <ul style="list-style-type: none"> • <i>Great Basin Xeric Mixed Sagebrush Shrubland</i> • <i>Inter-Mountain Basins Big Sagebrush Shrubland</i> • <i>Inter-Mountain Basins Semi-Desert Shrub Steppe</i> • <i>Inter-Mountain Basins Mixed Salt Desert Scrub</i> <p>Category B: 35% of this inventory unit is comprised of ecological groups which have less than ten percent of their total area protected in the NWPS. Ecological groups in category B include:</p> <ul style="list-style-type: none"> • <i>Inter-Mountain Basins Montane Sagebrush Steppe</i> <p>Category C: 99% of the inventory unit is comprised of ecological groups which have less than twenty percent of their total area protected in the NWPS. Ecological groups in Category C include:</p> <ul style="list-style-type: none"> • <i>Great Basin Pinyon-Juniper Woodland</i> <p>Inyo NF representation: Less than one percent of the area of this inventory unit contains ecological groups with less than twenty percent of their area on the Inyo NF in designated wilderness.</p>
1376	<p>General location: Benton-Casa Diablo Management Area Size: 9,922 acres</p> <p>Category A: 9% of the inventory unit is comprised of the following ecological groups, which have less than five percent of their total area protected in the NWPS:</p> <ul style="list-style-type: none"> • <i>Great Basin Xeric Mixed Sagebrush Shrubland</i> • <i>Inter-Mountain Basins Big Sagebrush Shrubland</i>

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	<ul style="list-style-type: none"> • <i>Inter-Mountain Basins Semi-Desert Shrub Steppe</i> • <i>Inter-Mountain Basins Mixed Salt Desert Scrub</i> <p>Category B: 15% of this inventory unit is comprised of ecological groups which have less than ten percent of their total area protected in the NWPS. Ecological groups in category B include:</p> <ul style="list-style-type: none"> • <i>Inter-Mountain Basins Montane Sagebrush Steppe</i> • <i>Great Basin Foothill and Lower Montane Riparian Woodland and Shrubland</i> <p>Category C: 100% of the inventory unit is comprised of ecological groups which have less than twenty percent of their total area protected in the NWPS. Ecological groups in Category C include:</p> <ul style="list-style-type: none"> • <i>Great Basin Pinyon-Juniper Woodland</i> <p>Inyo NF representation: Less than one percent of the area of this inventory unit contains ecological groups with less than twenty percent of their area on the Inyo NF in designated wilderness.</p>
1432	This area is on the Sequoia NF
1391	<p>General location: South Sierra Management Area Size: 33,248 acres adjacent to South Sierra Wilderness</p> <p>Category A: 11% of the inventory unit is comprised of the following ecological groups, which have less than five percent of their total area protected in the NWPS:</p> <ul style="list-style-type: none"> • <i>Inter-Mountain Basins Big Sagebrush Shrubland</i> <p>Category B: none</p> <p>Category C: 53% of the inventory unit is comprised of ecological groups which have less than twenty percent of their total area protected in the NWPS. Ecological groups in Category C include:</p> <ul style="list-style-type: none"> • <i>Great Basin Pinyon-Juniper Woodland</i> • <i>Rocky Mountain Aspen Forest and Woodland</i> <p>Inyo NF representation: This inventory unit does not contain any ecological groups with less than twenty percent of their area on the Inyo NF in designated wilderness.</p>

**Sierra NF Wilderness Inventory Areas
Summary of The Wilderness Society's data on
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Background

The Wilderness Society (TWS) comments indicated the Wilderness Evaluation process should consider the suitability of Wilderness Inventory Areas with under-represented and rare ecosystems. The Wilderness Society utilized several sets of available information at the national scale to identify under-represented ecosystems in the National Wilderness Preservation System (NWPS).

The National Vegetation Classification System Group 6¹ data was used to identify the set of forty-two ecological group within the Sierra NF. For each ecological group on the forest, the Wilderness Society provided two calculations: the percentage of an ecological group's total area (nation-wide) that is within the NWPS; the percentage of an ecological group's area within the Sierra NF that is within designated wilderness. The ecological groups were divided into four classes of representation, which are termed categories A through D below.

Category A is ecological groups on the Sierra NF that have less than five percent of their area protected within the NWPS:

Inter-Mountain Basins Big Sagebrush Shrubland-3% protected in NWPS

Inter-Mountain Basins Big Sagebrush Steppe-2% protected in NWPS

Temperate Pacific Freshwater Mudflat- 5% protected in NWPS

Category B is ecological groups on the Sierra NF that have between five and ten percent of their area protected within the NWPS:

1. *Open Water – fresh – 6% protected in NWPS*

Category C is ecological groups on the Sierra NF that have between ten and twenty percent of their area protected within the NWPS. The Wilderness Society indicated it considers ecological groups with less than twenty percent of its total area in the NWPS as inadequately represented².

1. *California Central Valley and Southern Coastal Grassland-12% protected in NWPS*

2. *California Central Valley Mixed Oak Savanna-14% protected in NWPS*

3. *California Lower Montane Blue Oak-Foothill Pine Woodland and Savanna-11% protected in NWPS*

4. *Great Basin Pinyon-Juniper Woodlands – 14% of ecosystem protected in NWPS*

5. *Inter-Mountain Basins Curl-leaf Mountain Mahogany Woodland and Shrubland-19% protected in NWPS*

6. *Mediterranean California Mesic Mixed Conifer Forest and Woodland-12% protected in NWPS*

7. *Mediterranean California Mixed Oak Woodland-10% protected in NWPS*

8. *Northern and Central California Dry-Mesic Chaparral-11% protected in NWPS*

9. *Rocky Mountain Aspen Forest and Woodland – 12% of ecosystem protected in NWPS.*

¹ The National Vegetation Classification System website indicates the ecological context for Group 6 data: regional mesoclimate, geology, substrates, hydrology and disturbance regimes.

² The twenty percent representation threshold is based on Society for Conservation Biology and Convention on Biological Diversity targets (personal communication with Matt Dietz).

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Category D is ecological groups on the Sierra NF that have more than twenty percent of their area protected within the NWPS, and are not discussed further.

Data Management and processing

1. Six of the forty-two ecological groups were not considered in this summary because their label indicated they are developed land.
2. No Category B data on the *open water (fresh)* ecosystem will be summarized because the TWS data did not include the acreage for this ecosystem on individual wilderness inventory units.
3. Area size information was converted from hectares to acres.
4. Ecological group in each category were ranked by size, largest to smallest.
5. Ecological group in each category with less than 1,000 total acres on all Sierra NF non-wilderness lands were not included in this summary.
6. For each category, the acres for the ecological groups in that category were summed for each wilderness inventory unit.
7. The percentage of each wilderness inventory unit's total area comprised of "under-represented" ecological groups was calculated.

The table below summarizes TWS "representation" data for each wilderness inventory area listed in the polygon column:

General location: Indicates whether the unit is adjacent to designated wilderness.

Size: The area in acres indicated is the "parent polygon".

Category A: The summary first displays the percentage of the wilderness inventory unit comprised of Category A ecological groups, and the types of type of ecological groups in Category A within the inventory unit. Any ecological groups with more than 1,000 acres in an inventory unit is highlighted in bold font.

Category C: Next, the summary displays the percentage of the wilderness inventory unit comprised of Category C ecological groups and the types of ecological groups within the inventory unit. Any ecological groups with more than 1,000 acres in an inventory unit is highlighted in bold font. **Note:** The percent of the wilderness inventory unit comprised of Category C ecosystems includes the area of Category A ecosystems (the names of the Category A ecosystems, however, are not listed again under Category C).

Sierra NF representation: The forest representation section displays two percentages. The first is the percentage of the area of a wilderness inventory unit that is comprised of ecological groups that have **less than five percent** of their total area on the forest in designated wilderness. The ecological groups with less than five percent of their total acreage on the forest in designated wilderness include:

- *California Central Valley Mixed Oak Savanna*
- *California Central Valley and Southern Coastal Grassland*
- *California Lower Montane Blue Oak-Foothill Pine Woodland and Savanna*

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- *Northern and Central California Dry-Mesic Chaparral*
- *Mediterranean California Dry-Mesic Mixed Conifer Forest and Woodland*
- *Recently burned forest acres*
- *Temperate Pacific Freshwater Mudflat*
- The second percentage is the percentage of the area of a wilderness inventory unit that is comprised of ecological groups that have **less than twenty percent** of their total acreage on the forest in designated wilderness. The ecological groups with less than twenty percent of their total acreage on the forest in designated wilderness include the same ecological groups as above, with the addition of:
 - *Mediterranean California Mixed Oak Woodland*
 - *Mojave Mid-elevation Mixed Desert Scrub*

Wilderness Inventory Unit	Summary
227	<p>General location: Not adjacent to designated wilderness Size: 15,358 acres</p> <p>Category A: Less than 1% of this inventory unit is comprised of the following Category A ecological groups, which have less than five percent of their total area protected in the NWPS:</p> <ul style="list-style-type: none"> • <i>Inter-Mountain Basins Big Sagebrush Steppe</i> <p>Category C: 78% of this inventory unit is comprised of the following ecological groups, which have less than twenty percent of their total area protected in the NWPS:</p> <ul style="list-style-type: none"> • <i>California Central Valley Mixed Oak Savanna</i> • <i>California Lower Montane Blue Oak-Foothill Pine Woodland and Savanna</i> • <i>Mediterranean California Mixed Oak Woodland</i> • <i>Rocky Mountain Aspen Forest and Woodland</i> • <i>Mediterranean California Mesic Mixed Conifer Forest and Woodland</i> • <i>Great Basin Pinyon-Juniper Woodland</i> • <i>Northern and Central California Dry-Mesic Chaparral</i> • <i>California Central Valley and Southern Coastal Grassland</i> <p>Sierra NF Representation: 65% percent of this inventory unit is comprised of ecological groups that have less than five percent of their area on the Forest protected in designated wilderness. 95% of this inventory unit is comprised of ecological groups that have less than twenty percent of their area on the Forest protected in designated wilderness.</p>
304	<p>General location: Not adjacent to designated wilderness Size: 5,916 acres</p> <p>Category A: There are no Category A ecological groups, which have less than five percent of their total area protected in the NWPS, in this wilderness inventory unit.</p>

**Sierra NF Wilderness Inventory Areas
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	<p>Category C: 88% of this Inventory unit is comprised of the following ecological groups, which have less than twenty percent of their total area protected in the NWPS:</p> <ul style="list-style-type: none"> • <i>California Central Valley Mixed Oak Savanna</i> • <i>California Lower Montane Blue Oak-Foothill Pine Woodland and Savanna</i> • <i>Mediterranean California Mixed Oak Woodland</i> • <i>Mediterranean California Mesic Mixed Conifer Forest and Woodland</i> • <i>Northern and Central California Dry-Mesic Chaparral</i> <p>Sierra NF Representation: 87% of this inventory unit is comprised of ecological groups that have less than five percent of their area on the Forest protected in designated wilderness. 95% of this inventory unit is comprised of ecological groups that have less than twenty percent of their area on the Forest protected in designated wilderness.</p>
<p>315</p>	<p>General location: Not adjacent to designated wilderness Size: 17,908 acres</p> <p>Category A: 2% of this Inventory unit is comprised of the following Category A ecological groups, which have less than five percent of their total area protected in the NWPS:</p> <ul style="list-style-type: none"> • <i>Inter-Mountain Basins Big Sagebrush Steppe</i> • <i>Inter-Mountain basins Big Sagebrush Shrubland</i> <p>Category C: 62% of this inventory unit is comprised of the following ecological groups, which have less than twenty percent of their total area protected in the NWPS:</p> <ul style="list-style-type: none"> • <i>California Central Valley Mixed Oak Savanna</i> • <i>California Lower Montane Blue Oak-Foothill Pine Woodland and Savanna</i> • <i>Mediterranean California Mixed Oak Woodland</i> • <i>Rocky Mountain Aspen Forest and Woodland</i> • <i>Mediterranean California Mesic Mixed Conifer Forest and Woodland</i> • <i>Great Basin Pinyon-Juniper Woodland</i> • <i>Inter-Mountain Basins Curl-leaf Mountain Mahogany Woodland and Shrubland</i> • <i>Northern and Central California Dry-Mesic Chaparral</i> <p>Sierra NF Representation: 35% of this inventory unit is comprised of ecological groups that have less than five percent of their area on the Forest protected in designated wilderness. 73% of this inventory unit is comprised of ecological groups that have less than twenty percent of their area on the Forest protected in designated wilderness.</p>
<p>330</p>	<p>General location: Not adjacent to designated wilderness Size: 7,804 acres</p> <p>Category A: 9% of this inventory unit is comprised of the following Category A ecological groups, which have less than five percent of their total area protected in the NWPS:</p> <ul style="list-style-type: none"> • <i>Inter-Mountain Basins Big Sagebrush Steppe</i>

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	<ul style="list-style-type: none"> • <i>Inter-Mountain basins Big Sagebrush Shrubland</i> <p>Category C: 85% of this inventory unit is comprised of the following ecological groups, which have less than twenty percent of their total area protected in the NWPS:</p> <ul style="list-style-type: none"> • <i>California Central Valley Mixed Oak Savanna</i> • <i>California Lower Montane Blue Oak-Foothill Pine Woodland and Savanna</i> • <i>Mediterranean California Mixed Oak Woodland</i> • <i>Rocky Mountain Aspen Forest and Woodland</i> • <i>Mediterranean California Mesic Mixed Conifer Forest and Woodland</i> • <i>Great Basin Pinyon-Juniper Woodland</i> • <i>Inter-Mountain Basins Curl-leaf Mountain Mahogany Woodland and Shrubland</i> • <i>Northern and Central California Dry-Mesic Chaparral</i> <p>Sierra NF Representation: 2% of this inventory unit is comprised of ecological groups that have less than five percent of their area on the Forest protected in designated wilderness. 68% of this inventory unit is comprised of ecological groups that have less than twenty percent of their area on the Forest protected in designated wilderness.</p>
357	<p>General location: Not adjacent to designated wilderness Size: 5,374 acres</p> <p>Category A: Less than one percent of this Inventory unit is comprised of the following Category A ecological groups, which have less than five percent of their total area protected in the NWPS:</p> <ul style="list-style-type: none"> • <i>Inter-Mountain Basins Big Sagebrush Steppe</i> • <i>Inter-Mountain basins Big Sagebrush Shrubland</i> <p>Category C: 45% of this inventory unit is comprised of the following ecological groups, which have less than twenty percent of their total area protected in the NWPS:</p> <ul style="list-style-type: none"> • <i>California Central Valley Mixed Oak Savanna</i> • <i>California Lower Montane Blue Oak-Foothill Pine Woodland and Savanna</i> • <i>Mediterranean California Mixed Oak Woodland</i> • <i>Mediterranean California Mesic Mixed Conifer Forest and Woodland</i> • <i>Northern and Central California Dry-Mesic Chaparral</i> <p>Sierra NF Representation: 72% of this inventory unit is comprised of ecological groups that have less than five percent of their area on the Forest protected in designated wilderness. 93% of this inventory unit is comprised of ecological groups that have less than twenty percent of their area on the Forest protected in designated wilderness.</p>
441	<p>General location: Not adjacent to designated wilderness Size: 6,892 acres</p> <p>Category A: 10% of this Inventory unit is comprised of the following Category A ecological groups, which has less than five percent of their total area protected in the</p>

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	<p>NWPS:</p> <ul style="list-style-type: none"> • <i>Inter-Mountain basins Big Sagebrush Shrubland</i> <p>Category C: 28% percent of this inventory unit is comprised of the following ecological groups, which have less than twenty percent of their total area protected in the NWPS:</p> <ul style="list-style-type: none"> • <i>Mediterranean California Mixed Oak Woodland</i> • <i>Mediterranean California Mesic Mixed Conifer Forest and Woodland</i> • <i>Rocky Mountain Aspen Forest and Woodland</i> • <i>Inter-Mountain Basins Curl-leaf Mountain Mahogany Woodland and Shrubland</i> <p>Sierra NF Representation: None of this inventory unit is comprised of ecological groups that have less than five percent of their area on the Forest protected in designated wilderness.</p> <p>16% of this inventory unit is comprised of ecological groups that have less than twenty percent of their area on the Forest protected in designated wilderness.</p>
539	<p>General location: Adjacent to Dinkey Lakes Wilderness Size: 48,312 acres</p> <p>Category A: 3% of this Inventory unit is comprised of the following Category A ecological groups, which has less than five percent of their total area protected in the NWPS:</p> <ul style="list-style-type: none"> • <i>Inter-Mountain Basins Big Sagebrush Shrubland</i> • <i>Inter-Mountain Basins Big Sagebrush Steppe</i> • <i>Temperate Pacific Freshwater Mudflat</i> <p>Category C: 6% of this inventory unit is comprised of the following ecological groups, which have less than twenty percent of their total area protected in the NWPS:</p> <ul style="list-style-type: none"> • <i>Mediterranean California Mixed Oak Woodland</i> • <i>Mediterranean California Mesic Mixed Conifer Forest and Woodland</i> • <i>Rocky Mountain Aspen Forest and Woodland</i> • <i>Great Basin Pinyon-Juniper Woodland</i> • <i>Inter-Mountain Basins Curl-leaf Mountain Mahogany Woodland and Shrubland</i> <p>Sierra NF Representation: 1% of this inventory unit is comprised of ecological groups that have less than five percent of their area on the Forest protected in designated wilderness.</p> <p>3% of this inventory unit is comprised of ecological groups that have less than twenty percent of their area on the Forest protected in designated wilderness.</p>
557	<p>General location: Not adjacent to designated wilderness Size: 5,072 acres</p> <p>Category A: 1% of this Inventory unit is comprised of the following Category A ecological groups, which have less than five percent of their total area protected in the NWPS:</p> <ul style="list-style-type: none"> • <i>Inter-Mountain Basins Big Sagebrush Steppe</i> • <i>Inter-Mountain basins Big Sagebrush Shrubland</i>

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	<p>Category C: 34% of this inventory unit is comprised of the following ecological groups, which have less than twenty percent of their total area protected in the NWPS:</p> <ul style="list-style-type: none"> • <i>California Lower Montane Blue Oak-Foothill Pine Woodland and Savanna</i> • <i>Mediterranean California Mixed Oak Woodland</i> • <i>Mediterranean California Mesic Mixed Conifer Forest and Woodland</i> • <i>Rocky Mountain Aspen Forest and Woodland</i> • <i>Inter-Mountain Basins Curl-leaf Mountain Mahogany Woodland and Shrubland</i> • <i>Northern and Central California Dry-Mesic Chaparral</i> <p>Sierra NF Representation:</p> <p>58% of this inventory unit is comprised of ecological groups that have less than five percent of their area on the Forest protected in designated wilderness. Most of the ecological group acreage in this unit is “recently burned forest acres”.</p> <p>90% of this inventory unit is comprised of ecological groups that have less than twenty percent of their area on the Forest protected in designated wilderness.</p>
577	<p>General location: Adjacent to Kaiser Wilderness Size: 7,127 acres</p> <p>Category A: 1% of this Inventory unit is comprised of the following Category A ecological groups, which have less than five percent of their total area protected in the NWPS:</p> <ul style="list-style-type: none"> • <i>Inter-Mountain Basins Big Sagebrush Steppe</i> • <i>Inter-Mountain basins Big Sagebrush Shrubland</i> <p>Category C: 25% of this inventory unit is comprised of the following ecological groups, which have less than twenty percent of their total area protected in the NWPS:</p> <ul style="list-style-type: none"> • <i>Mediterranean California Mixed Oak Woodland</i> • <i>Mediterranean California Mesic Mixed Conifer Forest and Woodland</i> • <i>Rocky Mountain Aspen Forest and Woodland</i> • <i>Inter-Mountain Basins Curl-leaf Mountain Mahogany Woodland and Shrubland</i> • <i>Great Basin Pinyon-Juniper Woodland</i> <p>Sierra NF Representation:</p> <p>None of this inventory unit is comprised of ecological groups that have less than five percent of their area on the Forest protected in designated wilderness.</p> <p>22% of this inventory unit is comprised of ecological groups that have less than twenty percent of their area on the Forest protected in designated wilderness.</p>
586	<p>General location: Not adjacent to designated wilderness Size: 5,412 acres</p> <p>Category A: 1% of this Inventory unit is comprised of the following Category A ecological groups, which have less than five percent of their total area protected in the NWPS:</p> <ul style="list-style-type: none"> • <i>Inter-Mountain Basins Big Sagebrush Steppe</i> • <i>Inter-Mountain basins Big Sagebrush Shrubland</i>

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	<p>Category C: 63% of this inventory unit is comprised of the following ecological groups, which have less than twenty percent of their total area protected in the NWPS:</p> <ul style="list-style-type: none"> • <i>California Lower Montane Blue Oak-Foothill Pine Woodland and Savanna</i> • <i>Mediterranean California Mixed Oak Woodland</i> • <i>Mediterranean California Mesic Mixed Conifer Forest and Woodland</i> • <i>Rocky Mountain Aspen Forest and Woodland</i> • <i>Inter-Mountain Basins Curl-leaf Mountain Mahogany Woodland and Shrubland</i> • <i>Northern and Central California Dry-Mesic Chaparral</i> <p>Sierra NF Representation:</p> <p>25% of this inventory unit is comprised of ecological groups that have less than five percent of their area on the Forest protected in designated wilderness.</p> <p>85% of this inventory unit is comprised of ecological groups that have less than twenty percent of their area on the Forest protected in designated wilderness.</p>
646	<p>General location: Not adjacent to designated wilderness Size: 18,013 acres</p> <p>Category A: 4% of this inventory unit is comprised of the following Category A ecological groups, which have less than five percent of their total area protected in the NWPS:</p> <ul style="list-style-type: none"> • <i>Inter-Mountain Basins Big Sagebrush Steppe</i> • <i>Inter-Mountain basins Big Sagebrush Shrubland</i> <p>Category C: 47% of this inventory unit is comprised of the following ecological groups, which have less than twenty percent of their total area protected in the NWPS:</p> <ul style="list-style-type: none"> • <i>Mediterranean California Mixed Oak Woodland</i> • <i>Mediterranean California Mesic Mixed Conifer Forest and Woodland</i> • <i>Rocky Mountain Aspen Forest and Woodland</i> • <i>Inter-Mountain Basins Curl-leaf Mountain Mahogany Woodland and Shrubland</i> • <i>Great Basin Pinyon-Juniper Woodland</i> <p>Sierra NF Representation:</p> <p>None of this inventory unit is comprised of ecological groups that have less than five percent of their area on the Forest protected in designated wilderness.</p> <p>41% of this inventory unit is comprised of ecological groups that have less than twenty percent of their area on the Forest protected in designated wilderness.</p>
688	<p>General location: Not adjacent to designated wilderness Size: 6,515 acres</p> <p>Category A: 8% of this inventory unit is comprised of the following Category A ecological groups, which have less than five percent of their total area protected in the NWPS:</p> <ul style="list-style-type: none"> • <i>Inter-Mountain Basins Big Sagebrush Steppe</i> • <i>Inter-Mountain basins Big Sagebrush Shrubland</i>

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	<p>Category C: 71% of this inventory unit is comprised of the following ecological groups, which have less than twenty percent of their total area protected in the NWPS:</p> <ul style="list-style-type: none"> • <i>Mediterranean California Mixed Oak Woodland</i> • <i>Mediterranean California Mesic Mixed Conifer Forest and Woodland</i> • <i>Rocky Mountain Aspen Forest and Woodland</i> • <i>Inter-Mountain Basins Curl-leaf Mountain Mahogany Woodland and Shrubland</i> • <i>Great Basin Pinyon-Juniper Woodland</i> <p>Sierra NF Representation:</p> <p>None of this inventory unit is comprised of ecological groups that have less than five percent of their area on the Forest protected in designated wilderness.</p> <p>56% of this inventory unit is comprised of ecological groups that have less than twenty percent of their area on the Forest protected in designated wilderness.</p>
772	<p>General location: Not adjacent to designated wilderness Size: 47,747 acres</p> <p>Category A: 1% of this inventory unit is comprised of the following Category A ecological groups, which have less than five percent of their total area protected in the NWPS:</p> <ul style="list-style-type: none"> • <i>Inter-Mountain Basins Big Sagebrush Steppe</i> • <i>Inter-Mountain basins Big Sagebrush Shrubland</i> <p>Category C: 70% of this inventory unit is comprised of the following ecological groups, which have less than twenty percent of their total area protected in the NWPS:</p> <ul style="list-style-type: none"> • <i>California Central Valley Mixed Oak Savanna</i> • <i>California Lower Montane Blue Oak-Foothill Pine Woodland and Savanna</i> • <i>Mediterranean California Mixed Oak Woodland</i> • <i>Rocky Mountain Aspen Forest and Woodland</i> • <i>Mediterranean California Mesic Mixed Conifer Forest and Woodland</i> • <i>Great Basin Pinyon-Juniper Woodland</i> • <i>Inter-Mountain Basins Curl-leaf Mountain Mahogany Woodland and Shrubland</i> • <i>Northern and Central California Dry-Mesic Chaparral</i> <p>Sierra NF Representation:</p> <p>34% of this inventory unit is comprised of ecological groups that have less than five percent of their area on the Forest protected in designated wilderness.</p> <p>91% of this inventory unit is comprised of ecological groups that have less than twenty percent of their area on the Forest protected in designated wilderness.</p>
781	<p>General location: Adjacent to John Muir Wilderness Size: 2,477 acres</p> <p>Category A: 21% percent of this inventory unit is comprised of the following Category A ecological groups, which has less than five percent of their total area protected in the</p>

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	<p>NWPS:</p> <ul style="list-style-type: none"> • <i>Inter-Mountain basins Big Sagebrush Shrubland</i> <p>Category C: 32% of this inventory unit is comprised of the following ecological groups, which have less than twenty percent of their total area protected in the NWPS:</p> <ul style="list-style-type: none"> • <i>Mediterranean California Mixed Oak Woodland</i> • <i>Rocky Mountain Aspen Forest and Woodland</i> • <i>Mediterranean California Mesic Mixed Conifer Forest and Woodland</i> • <i>Great Basin Pinyon-Juniper Woodland</i> • <i>Inter-Mountain Basins Curl-leaf Mountain Mahogany Woodland and Shrubland</i> <p>Sierra NF Representation:</p> <p>None of this inventory unit is comprised of ecological groups that have less than five percent of their area on the Forest protected in designated wilderness.</p> <p>9% of this inventory unit is comprised of ecological groups that have less than twenty percent of their area on the Forest protected in designated wilderness.</p>
785	<p>General location: Adjacent to John Muir Wilderness Size: 1,254 acres</p> <p>Category A: 46% of this inventory unit is comprised of the following Category A ecological groups, which have less than five percent of their total area protected in the NWPS:</p> <ul style="list-style-type: none"> • <i>Inter-Mountain Basins Big Sagebrush Shrubland</i> • <i>Temperate Pacific Freshwater Mudflat</i> <p>Category C: 50% of this inventory unit is comprised of the following ecological groups, which have less than twenty percent of their total area protected in the NWPS:</p> <ul style="list-style-type: none"> • <i>Rocky Mountain Aspen Forest and Woodland</i> • <i>Mediterranean California Mesic Mixed Conifer Forest and Woodland</i> • <i>Great Basin Pinyon-Juniper Woodland</i> <p>Sierra NF Representation:</p> <p>27% of this inventory unit is comprised of ecological groups that have less than five percent of their area on the Forest protected in designated wilderness.</p> <p>27% of this inventory unit is comprised of ecological groups that have less than twenty percent of their area on the Forest protected in designated wilderness.</p>
795	<p>General location: Adjacent to John Muir Wilderness Size: 1,206 acres</p> <p>Category A: 9% of this inventory unit is comprised of the following Category A ecological groups, which has less than five percent of their total area protected in the NWPS:</p> <ul style="list-style-type: none"> • <i>Inter-Mountain Basins Big Sagebrush Shrubland</i> <p>Category C: 17% of this inventory unit is comprised of the following ecological groups, which have less than twenty percent of their total area protected in the NWPS:</p> <ul style="list-style-type: none"> • <i>Rocky Mountain Aspen Forest and Woodland</i>

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	<ul style="list-style-type: none"> • <i>Mediterranean California Mesic Mixed Conifer Forest and Woodland</i> • <i>Great Basin Pinyon-Juniper Woodland</i> • <i>Inter-Mountain Basins Curl-leaf Mountain Mahogany Woodland and Shrubland</i> <p>Sierra NF Representation:</p> <p>None of this inventory unit is comprised of ecological groups that have less than five percent of their area on the Forest protected in designated wilderness.</p> <p>1% of this inventory unit is comprised of ecological groups that have less than twenty percent of their area on the Forest protected in designated wilderness.</p>
797	<p>General location: Adjacent to John Muir Wilderness Size: 1,299 acres</p> <p>Category A: None of this inventory unit is comprised of the following Category A ecological groups, which has less than five percent of their total area protected in the NWPS.</p> <p>Category C: 2% of this inventory unit is comprised of the following ecological groups, which have less than twenty percent of their total area protected in the NWPS:</p> <ul style="list-style-type: none"> • <i>Rocky Mountain Aspen Forest and Woodland</i> • <i>Mediterranean California Mesic Mixed Conifer Forest and Woodland</i> • <i>Great Basin Pinyon-Juniper Woodland</i> <p>Sierra NF Representation:</p> <p>None of this inventory unit is comprised of ecological groups that have less than five percent of their area on the Forest protected in designated wilderness.</p> <p>1% of this inventory unit is comprised of ecological groups that have less than twenty percent of their area on the Forest protected in designated wilderness.</p>
815	<p>General location: Adjacent to John Muir Wilderness Size: 3,888 acres</p> <p>Category A: 12% of this inventory unit is comprised of the following Category A ecological groups, which have less than five percent of their total area protected in the NWPS:</p> <ul style="list-style-type: none"> • <i>Inter-Mountain Basins Big Sagebrush Shrubland</i> • <i>Temperate Pacific Freshwater Mudflat</i> <p>Category C: 14% of this inventory unit is comprised of the following ecological groups, which have less than twenty percent of their total area protected in the NWPS:</p> <ul style="list-style-type: none"> • <i>Rocky Mountain Aspen Forest and Woodland</i> • <i>Mediterranean California Mesic Mixed Conifer Forest and Woodland</i> • <i>Great Basin Pinyon-Juniper Woodland</i> • <i>Inter-Mountain Basins Curl-leaf Mountain Mahogany Woodland and Shrubland</i> <p>Sierra NF Representation:</p>

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	<p>9% of this inventory unit is comprised of ecological groups that have less than five percent of their area on the Forest protected in designated wilderness.</p> <p>9% of this inventory unit is comprised of ecological groups that have less than twenty percent of their area on the Forest protected in designated wilderness.</p>
<p>819</p>	<p>General location: Adjacent to John Muir Wilderness Size: 37,528 acres</p> <p>Category A: 6% of this inventory unit is comprised of the following Category A ecological groups, which have less than five percent of their total area protected in the NWPS:</p> <ul style="list-style-type: none"> • <i>Inter-Mountain Basins Big Sagebrush Shrubland</i> • <i>Inter-Mountain Basins Big Sagebrush Steppe</i> <p>Category C: 60% of this inventory unit is comprised of the following ecological groups, which have less than twenty percent of their total area protected in the NWPS:</p> <ul style="list-style-type: none"> • <i>California Central Valley Mixed Oak Savanna</i> • <i>California Lower Montane Blue Oak-Foothill Pine Woodland and Savanna</i> • <i>Mediterranean California Mixed Oak Woodland</i> • <i>Rocky Mountain Aspen Forest and Woodland</i> • <i>Mediterranean California Mesic Mixed Conifer Forest and Woodland</i> • <i>Great Basin Pinyon-Juniper Woodland</i> • <i>Inter-Mountain Basins Curl-leaf Mountain Mahogany Woodland and Shrubland</i> • <i>Northern and Central California Dry-Mesic Chaparral</i> <p>Sierra NF Representation:</p> <p>23% of this inventory unit is comprised of ecological groups that have less than five percent of their area on the Forest protected in designated wilderness.</p> <p>63% of this inventory unit is comprised of ecological groups that have less than twenty percent of their area on the Forest protected in designated wilderness.</p>
<p>820</p>	<p>General location: Adjacent to John Muir Wilderness Size: 1,741 acres</p> <p>Category A: 15% of this inventory unit is comprised of the following Category A ecological groups , which have less than five percent of their total area protected in the NWPS:</p> <ul style="list-style-type: none"> • <i>Inter-Mountain Basins Big Sagebrush Shrubland</i> • <i>Inter-Mountain Basins Big Sagebrush Steppe</i> <p>Category C: 56% of this inventory unit is comprised of the following ecological groups , which have less than twenty percent of their total area protected in the NWPS:</p> <ul style="list-style-type: none"> • <i>Mediterranean California Mixed Oak Woodland</i> • <i>Rocky Mountain Aspen Forest and Woodland</i> • <i>Mediterranean California Mesic Mixed Conifer Forest and Woodland</i> • <i>Great Basin Pinyon-Juniper Woodland</i>

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	<ul style="list-style-type: none"> • <i>Inter-Mountain Basins Curl-leaf Mountain Mahogany Woodland and Shrubland</i> <p>Sierra NF Representation:</p> <p>23% of this inventory unit is comprised of ecological groups that have less than five percent of their area on the Forest protected in designated wilderness.</p> <p>33% of this inventory unit is comprised of ecological groups that have less than twenty percent of their area on the Forest protected in designated wilderness.</p>
<p>821</p>	<p>General location: Adjacent to Yosemite National Park Wilderness Size: 13,370 acres</p> <p>Category A: Less than 1% of this inventory unit is comprised of the following Category A ecological groups, which have less than five percent of their total area protected in the NWPS:</p> <ul style="list-style-type: none"> • <i>Inter-Mountain Basins Big Sagebrush Shrubland</i> <p>Category C: 16% of this inventory unit is comprised of the following ecological groups, which have less than twenty percent of their total area protected in the NWPS:</p> <ul style="list-style-type: none"> • <i>Mediterranean California Mixed Oak Woodland</i> • <i>Rocky Mountain Aspen Forest and Woodland</i> • <i>Mediterranean California Mesic Mixed Conifer Forest and Woodland</i> • <i>Great Basin Pinyon-Juniper Woodland</i> • <i>Inter-Mountain Basins Curl-leaf Mountain Mahogany Woodland and Shrubland</i> <p>Sierra NF Representation:</p> <p>Less than one percent of this inventory unit is comprised of ecological groups that have less than five percent of their area on the Forest protected in designated wilderness.</p> <p>14% of this inventory unit is comprised of ecological groups that have less than twenty percent of their area on the Forest protected in designated wilderness.</p>
<p>822</p>	<p>General location: Adjacent to Ansel Adams Wilderness Size: 10,581 acres</p> <p>Category A: 3% of this inventory unit is comprised of the following Category A ecological groups, which has less than five percent of its total area protected in the NWPS:</p> <ul style="list-style-type: none"> • <i>Inter-Mountain Basins Big Sagebrush Shrubland</i> <p>Category C: 16% of this inventory unit is comprised of the following ecological groups, which have less than twenty percent of their total area protected in the NWPS:</p> <ul style="list-style-type: none"> • <i>Mediterranean California Mixed Oak Woodland</i> • <i>Rocky Mountain Aspen Forest and Woodland</i> • <i>Mediterranean California Mesic Mixed Conifer Forest and Woodland</i> • <i>Great Basin Pinyon-Juniper Woodland</i> • <i>Inter-Mountain Basins Curl-leaf Mountain Mahogany Woodland and Shrubland</i> <p>Sierra NF Representation:</p>

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	<p>None of this inventory unit is comprised of ecological groups that have less than five percent of their area on the Forest protected in designated wilderness.</p> <p>11% of this inventory unit is comprised of ecological groups that have less than twenty percent of their area on the Forest protected in designated wilderness.</p>
<p>1378</p>	<p>General location: Adjacent to John Muir Wilderness</p> <p>Note – This WIA may be located on both Sierra and Sequoia NF [UFS1]</p> <p>Size: 71,974 acres</p> <p>Category A: 1% of this inventory unit is comprised of the following Category A ecological groups, which has less than five percent of its total area protected in the NWPS:</p> <ul style="list-style-type: none"> • <i>Inter-Mountain Basins Big Sagebrush Shrubland</i> • <i>Inter-Mountain Basins Big Sagebrush Steppe</i> <p>Category C: 31% of this inventory unit is comprised of the following ecological groups, which have less than twenty percent of their total area protected in the NWPS:</p> <ul style="list-style-type: none"> • <i>California Central Valley Mixed Oak Savanna</i> • <i>California Lower Montane Blue Oak-Foothill Pine Woodland and Savanna</i> • <i>Mediterranean California Mixed Oak Woodland</i> • <i>Rocky Mountain Aspen Forest and Woodland</i> • <i>Mediterranean California Mesic Mixed Conifer Forest and Woodland</i> • <i>Great Basin Pinyon-Juniper Woodland</i> • <i>Inter-Mountain Basins Curl-leaf Mountain Mahogany Woodland and Shrubland</i> • <i>Northern and Central California Dry-Mesic Chaparral</i> <p>Sierra NF Representation:</p> <p>16% of this inventory unit is comprised of ecological groups that have less than five percent of their area on the Forest protected in designated wilderness.</p> <p>33% of this inventory unit is comprised of ecological groups that have less than twenty percent of their area on the Forest protected in designated wilderness.</p>

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Background

The Wilderness Society (TWS) comments indicated the Wilderness Evaluation process should consider the suitability of Wilderness Inventory Areas with under-represented and rare ecosystems. The Wilderness Society utilized several sets of available information at the national scale to identify under-represented ecosystems in the National Wilderness Preservation System (NWPS).

The National Vegetation Classification System Group 6¹ (ecological group) data was used to identify a set of forty-four "ecosystems" that are within the Sequoia NF boundary. For each ecological group on the forest, the Wilderness Society provided two calculations: the percentage of an ecological group's total area (nation-wide) that is within the NWPS; the percentage of an ecological group's area within the Sequoia NF that is within designated wilderness. The ecological groups were divided into four classes of representation, which are termed categories A through D below.

Category A is ecological groups on the Sequoia NF that have less than five percent of their area protected within the NWPS:

1. *Inter-Mountain Basins Big Sagebrush Shrubland-three percent protected in NWPS*
2. *Inter-Mountain Basins Big Sagebrush Steppe-two percent protected in NWPS*

Category B is ecological groups on the Sequoia NF that have between five and ten percent of their area protected within the NWPS:

- *There are no ecological groups on the Sequoia NF in this category of representation.*

Category C is ecological groups on the Sequoia NF that have between ten and twenty percent of their area protected within the NWPS. The Wilderness Society indicated it considers ecological groups with less than twenty percent of its total area in the NWPS as inadequately represented² in the NWPS.

1. *California Central Valley and Southern Coastal Grassland-12% protected in NWPS*
2. *California Central Valley Mixed Oak Savanna-14% percent protected in NWPS*
3. *California Lower Montane Blue Oak-Foothill Pine Woodland and Savanna-11% protected in NWPS*
4. *Great Basin Pinyon-Juniper Woodlands – 14% protected in NWPS*
5. *Mediterranean California Mesic Mixed Conifer Forest and Woodland-12% protect in NWPS*
6. *Mediterranean California Mixed Oak Woodland-10% protected in NWPS*
7. *Northern and Central California Dry-Mesic Chaparral-11% protected in NWPS*
8. *Rocky Mountain Aspen Forest and Woodland – 12% of ecosystem protected in NWPS.*

Category D is ecological groups on the Sequoia NF that have more than twenty percent of their area protected within the NWPS, and are not discussed further.

¹ The National Vegetation Classification System website indicates the ecological context for Group 6 data: regional mesoclimate, geology, substrates, hydrology and disturbance regimes.

² The twenty percent representation threshold is based on Society for Conservation Biology and Convention on Biological Diversity targets (personal communication with Matt Dietz).

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Data Management and processing

1. Eight of the forty-four ecological groups were not considered in this summary because their label indicated they are developed land.
2. Area size information was converted from hectares to acres.
3. Ecological groups in each category were ranked by size, largest to smallest.
4. Ecological groups in each category with less than 1,000 total acres on all Sequoia NF non-wilderness lands were not included in this summary.
5. For each category, the acres for the ecological groups in that category were summed for each wilderness inventory unit.
6. The percentage of each wilderness inventory unit's total area comprised of "under-represented" ecological groups was calculated.

The table below summarizes TWS "representation" data for each wilderness inventory area listed in the polygon column:

General location: Indicates whether the unit is adjacent to designated wilderness.

Size: The area in acres indicated is the "parent polygon".

Category A: The summary first displays the percentage of the wilderness inventory unit comprised of Category A ecological groups, and the types of type of ecological groups in Category A within the inventory unit. Any ecological groups with more than 1,000 acres in an inventory unit is highlighted in bold font. **Category C:** Next, the summary displays the percentage of the wilderness inventory unit comprised of Category C ecological groups, and the types of ecological groups in Category C within the inventory unit. Any ecological groups with more than 1,000 acres in an inventory unit is highlighted in bold font. **Note:** The percent of the wilderness inventory unit comprised of Category C ecological groups includes the area of Category A ecological groups (the names of the Category A ecosystems, however, are not listed again under Category C).

Sequoia NF representation: The forest representation section displays two percentages. The first is the percentage of the area of a wilderness inventory unit that is comprised of ecological groups that have less than five percent of their total area on the forest in designated wilderness. The ecological groups with less than five percent of their total acreage on the forest in designated wilderness include:

- *California Central Valley Mixed Oak Savanna*
- *California Central Valley and Southern Coastal Grassland*

The second percentage is the percentage of the area of a wilderness inventory unit that is comprised of ecological groups that have less than twenty percent of their total acreage on the forest in designated wilderness. The ecological groups with less than twenty percent of their total acreage on the forest in designated wilderness include the same ecological groups as above, with the addition of:

- *California Lower Montane Blue Oak-Foothill Pine Woodland and Savanna*
- *Mediterranean California Dry-Mesic Mixed Conifer Forest and Woodland*

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- *Mediterranean California Mesic Mixed Conifer Forest and Woodland*
- *Mediterranean California Mixed Oak Woodland*
- *Northern and Central California Dry-Mesic Chaparral*

Wilderness Inventory Unit	Summary
18	<p>General location: Not adjacent to designated wilderness Size: 6,337 acres</p> <p>Category A: 2% of this inventory unit is comprised of the following Category A ecological groups, which have less than five percent of their total area protected in the NWPS:</p> <ul style="list-style-type: none"> • <i>Inter-Mountain Basins Big Sagebrush Steppe</i> • <i>Inter-Mountain Basins Big Sagebrush Steppe</i> <p>Category C: 38% of this inventory unit is comprised of the following ecological groups, which have less than twenty percent of their total area protected in the NWPS:</p> <ul style="list-style-type: none"> • <i>California Lower Montane Blue Oak-Foothill Pine Woodland and Savanna</i> • <i>Mediterranean California Mixed Oak Woodland</i> • <i>Mediterranean California Mesic Mixed Conifer Forest and Woodland</i> • <i>Great Basin Pinyon-Juniper Woodland</i> • <i>Rocky Mountain Aspen Forest and Woodland</i> <p>Sequoia NF Representation:</p> <p>None of this inventory unit is comprised of ecological groups that have less than five percent of their area on the Forest protected in designated wilderness.</p> <p>29% of this inventory unit is comprised of ecological groups that have less than twenty percent of their area on the Forest protected in designated wilderness.</p>
36	<p>General location: Not adjacent to wilderness Size: 2,089 acres</p> <p>Category A: 1% of this inventory unit is comprised of the following Category A ecological groups, which have less than five percent of their total area protected in the NWPS:</p> <ul style="list-style-type: none"> • <i>Inter-Mountain Basins Big Sagebrush Steppe</i> • <i>Inter-Mountain Basins Big Sagebrush Steppe</i> <p>Category C: 34% of this Inventory unit is comprised of the following ecological groups, which have less than twenty percent of their total area protected in the NWPS:</p> <ul style="list-style-type: none"> • <i>California Central Valley Mixed Oak Savanna</i> • <i>California Lower Montane Blue Oak-Foothill Pine Woodland and Savanna</i> • <i>Great Basin Pinyon-Juniper Woodland</i>

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	<ul style="list-style-type: none"> • <i>Mediterranean California Mesic Mixed Conifer Forest and Woodland</i> • <i>Mediterranean California Mixed Oak Woodland</i> • <i>Northern and Central California Dry-Mesic Chaparral</i> <p>Sequoia NF Representation:</p> <p>None of this inventory unit is comprised of ecological groups that have less than five percent of their area on the Forest protected in designated wilderness.</p> <p>36% of this inventory unit is comprised of ecological groups that have less than twenty percent of their area on the Forest protected in designated wilderness.</p>
63	<p>General location: Not adjacent to designated wilderness Size: 5,223 acres</p> <p>Category A: 1% of this Inventory unit is comprised of the following Category A ecological group, which has less than five percent of its total area protected in the NWPS:</p> <ul style="list-style-type: none"> • <i>Inter-Mountain Basins Big Sagebrush Steppe</i> <p>Category C: 30% of this inventory unit is comprised of the following ecological groups, which have less than twenty percent of their total area protected in the NWPS:</p> <ul style="list-style-type: none"> • <i>California Central Valley Mixed Oak Savanna</i> • <i>California Lower Montane Blue Oak-Foothill Pine Woodland and Savanna</i> • <i>Great Basin Pinyon-Juniper Woodland</i> • <i>Mediterranean California Mesic Mixed Conifer Forest and Woodland</i> • <i>Mediterranean California Mixed Oak Woodland</i> • <i>Northern and Central California Dry-Mesic Chaparral</i> • <i>Rocky Mountain Aspen Forest and Woodland</i> <p>Sequoia NF Representation:</p> <p>6% of this inventory unit is comprised of ecological groups that have less than five percent of their area on the Forest protected in designated wilderness.</p> <p>32% percent of this inventory unit is comprised of ecological groups that have less than twenty percent of their area on the Forest protected in designated wilderness.</p>
66	<p>General location: Not adjacent to designated wilderness Size: 8,289 acres</p> <p>Category A: Less than one percent of this inventory unit is comprised of the following Category A ecological group, which has less than five percent of its total area protected in the NWPS:</p> <ul style="list-style-type: none"> • <i>Inter-Mountain Basins Big Sagebrush Steppe</i> <p>Category C: 88% percent of this inventory unit is comprised of the following ecosystems, which have less than twenty percent of their total area protected in the NWPS:</p> <ul style="list-style-type: none"> • <i>California Central Valley and Southern Coastal Grassland</i> • <i>California Central Valley Mixed Oak Savanna</i>

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	<ul style="list-style-type: none"> • <i>California Lower Montane Blue Oak-Foothill Pine Woodland and Savanna</i> • <i>Mediterranean California Mesic Mixed Conifer Forest and Woodland</i> • <i>Mediterranean California Mixed Oak Woodland</i> • <i>Northern and Central California Dry-Mesic Chaparral</i> <p>Sequoia NF Representation:</p> <p>28% of this inventory unit is comprised of ecological groups that have less than five percent of their area on the Forest protected in designated wilderness.</p> <p>37% of this inventory unit is comprised of ecological groups that have less than twenty percent of their area on the Forest protected in designated wilderness.</p>
73	<p>General location: Not adjacent to designated wilderness Size: 15,128 acres</p> <p>Category A: 1% of this Inventory unit is comprised of the following Category A ecological groups, which have less than five percent of their total area protected in the NWPS:</p> <ul style="list-style-type: none"> • <i>Inter-Mountain Basins Big Sagebrush Steppe</i> • <i>Inter-Mountain basins Big Sagebrush Shrubland</i> <p>Category C: 31% of this inventory unit is comprised of the following ecological groups, which have less than twenty percent of their total area protected in the NWPS:</p> <ul style="list-style-type: none"> • <i>California Central Valley and Southern Coastal Grassland</i> • <i>California Central Valley Mixed Oak Savanna</i> • <i>California Lower Montane Blue Oak-Foothill Pine Woodland and Savanna</i> • <i>Great Basin Pinyon-Juniper Woodland</i> • <i>Mediterranean California Mesic Mixed Conifer Forest and Woodland</i> • <i>Mediterranean California Mixed Oak Woodland</i> • <i>Northern and Central California Dry-Mesic Chaparral</i> • <i>Rocky Mountain Aspen Forest and Woodland</i> <p>Sequoia NF Representation:</p> <p>None of this inventory unit is comprised of ecological groups that have less than five percent of their area on the Forest protected in designated wilderness.</p> <p>32% of this inventory unit is comprised of ecological groups that have less than twenty percent of their area on the Forest protected in designated wilderness.</p>
99	<p>General location: Not adjacent to designated wilderness Size: 9,386 acres</p> <p>Category A: Less than one percent of this inventory unit is comprised of Category A ecological groups. which have less than five percent of their total area protected in the NWPS:</p> <ul style="list-style-type: none"> • <i>Inter-Mountain Basins Big Sagebrush Shrubland</i>

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	<ul style="list-style-type: none"> • <i>Inter-Mountain Basins Big Sagebrush Steppe</i> <p>Category C: 34% of this inventory unit is comprised of the following ecological groups, which have less than twenty percent of their total area protected in the NWPS:</p> <ul style="list-style-type: none"> • <i>Great Basin Pinyon-Juniper Woodland</i> • <i>Mediterranean California Mesic Mixed Conifer Forest and Woodland</i> • <i>Mediterranean California Mixed Oak Woodland</i> • <i>Rocky Mountain Aspen Forest and Woodland</i> <p>Sequoia NF Representation:</p> <p>None of this inventory unit is comprised of ecological groups that have less than five percent of their area on the Forest protected in designated wilderness.</p> <p>34% of this inventory unit is comprised of ecological groups that have less than twenty percent of their area on the Forest protected in designated wilderness.</p>
120	<p>General location: Not adjacent to designated wilderness Size: 6,855 acres</p> <p>Category A: None of this Inventory unit is comprised of Category A ecological groups.</p> <p>Category C: 38% of this inventory unit is comprised of the following ecological groups, which have less than twenty percent of their total area protected in the NWPS:</p> <ul style="list-style-type: none"> • <i>California Central Valley and Southern Coastal Grassland</i> • <i>California Lower Montane Blue Oak-Foothill Pine Woodland and Savanna</i> • <i>Mediterranean California Mesic Mixed Conifer Forest and Woodland</i> • <i>Mediterranean California Mixed Oak Woodland</i> <p>Sequoia NF Representation:</p> <p>None of this inventory unit is comprised of ecological groups that have less than five percent of their area on the Forest protected in designated wilderness.</p> <p>38% of this inventory unit is comprised of ecological groups that have less than twenty percent of their area on the Forest protected in designated wilderness.</p>
160	<p>General location: Not adjacent to designated wilderness Size: 16,126 acres</p> <p>Category A: Less than one percent of this Inventory unit is comprised of the following Category A ecological group, which has less than five percent of its total area protected in the NWPS:</p> <ul style="list-style-type: none"> • <i>Inter-Mountain basins Big Sagebrush Shrubland</i> <p>Category C: 17% of this inventory unit is comprised of the following ecological groups, which have less than twenty percent of their total area protected in the NWPS:</p> <ul style="list-style-type: none"> • <i>Great Basin Pinyon-Juniper Woodland</i> • <i>Mediterranean California Mesic Mixed Conifer Forest and Woodland</i> • <i>Mediterranean California Mixed Oak Woodland</i>

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	<ul style="list-style-type: none"> • <i>Rocky Mountain Aspen Forest and Woodland</i> <p>Sequoia NF Representation:</p> <p>None of this inventory unit is comprised of ecological groups that have less than five percent of their area on the Forest protected in designated wilderness.</p> <p>16% of this inventory unit is comprised of ecological groups that have less than twenty percent of their area on the Forest protected in designated wilderness.</p>
162	<p>General location: Not adjacent to designated wilderness Size: 15,806 acres</p> <p>Category A: None of this Inventory unit is comprised of a Category A ecological group.</p> <p>Category C: 38% of this inventory unit is comprised of the following ecological groups, which have less than twenty percent of their total area protected in the NWPS:</p> <ul style="list-style-type: none"> • <i>California Central Valley and Southern Coastal Grassland</i> • <i>California Central Valley Mixed Oak Savanna</i> • <i>California Lower Montane Blue Oak-Foothill Pine Woodland and Savanna</i> • <i>Great Basin Pinyon-Juniper Woodland</i> • <i>Mediterranean California Mesic Mixed Conifer Forest and Woodland</i> • <i>Mediterranean California Mixed Oak Woodland</i> • <i>Northern and Central California Dry-Mesic Chaparral</i> <p>Sequoia NF Representation:</p> <p>3% of this inventory unit is comprised of ecological groups that have less than five percent of their area on the Forest protected in designated wilderness.</p> <p>38% of this inventory unit is comprised of ecological groups that have less than twenty percent of their area on the Forest protected in designated wilderness.</p>
173	<p>General location: Not adjacent to designated wilderness Size: 5,307 acres</p> <p>Category A: None of this Inventory unit is comprised of a Category A ecological group.</p> <p>Category C: 39% of this inventory unit is comprised of the following ecological groups, which have less than twenty percent of their total area protected in the NWPS:</p> <ul style="list-style-type: none"> • <i>California Central Valley and Southern Coastal Grassland</i> • <i>California Central Valley Mixed Oak Savanna</i> • <i>California Lower Montane Blue Oak-Foothill Pine Woodland and Savanna</i> • <i>Mediterranean California Mesic Mixed Conifer Forest and Woodland</i> • <i>Mediterranean California Mixed Oak Woodland</i> • <i>Northern and Central California Dry-Mesic Chaparral</i>

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	<p>Sequoia NF Representation:</p> <p>None of this inventory unit is comprised of ecological groups that have less than five percent of their area on the Forest protected in designated wilderness.</p> <p>39% of this inventory unit is comprised of ecological groups that have less than twenty percent of their area on the Forest protected in designated wilderness.</p>
190	<p>General location: Not adjacent to designated wilderness Size: 7,100 acres</p> <p>Category A: Less than one percent of this Inventory unit is comprised of the following Category A ecological groups, which have less than five percent of their total area protected in the NWPS:</p> <ul style="list-style-type: none"> • <i>Inter-Mountain basins Big Sagebrush Shrubland</i> • <i>Inter-Mountain Basins Big Sagebrush Steppe</i> <p>Category C: 36% of this inventory unit is comprised of the following ecological groups, which have less than twenty percent of their total area protected in the NWPS:</p> <ul style="list-style-type: none"> • <i>California Central Valley and Southern Coastal Grassland</i> • <i>California Lower Montane Blue Oak-Foothill Pine Woodland and Savanna</i> • <i>Great Basin Pinyon-Juniper Woodland</i> • <i>Mediterranean California Mesic Mixed Conifer Forest and Woodland</i> • <i>Mediterranean California Mixed Oak Woodland</i> • <i>Northern and Central California Dry-Mesic Chaparral</i> • <i>Rocky Mountain Aspen Forest and Woodland</i> <p>Sequoia NF Representation:</p> <p>None of this inventory unit is comprised of ecological groups that have less than five percent of their area on the Forest protected in designated wilderness.</p> <p>36% of this inventory unit is comprised of ecological groups that have less than twenty percent of their area on the Forest protected in designated wilderness.</p>
1364	<p>General location: Not adjacent to designated wilderness Size: 9,203 acres</p> <p>Category A: Less than one percent of this Inventory unit is comprised of the following Category A ecological group, which has less than five percent of its total area protected in the NWPS:</p> <ul style="list-style-type: none"> • <i>Inter-Mountain basins Big Sagebrush Steppe</i> <p>Category C: 39% of this inventory unit is comprised of the following ecological groups, which have less than twenty percent of their total area protected in the NWPS:</p> <ul style="list-style-type: none"> • <i>California Central Valley and Southern Coastal Grassland</i> • <i>California Central Valley Mixed Oak Savanna</i> • <i>California Lower Montane Blue Oak-Foothill Pine Woodland and</i>

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	<p style="text-align: center;"><i>Savanna</i></p> <ul style="list-style-type: none"> • <i>Great Basin Pinyon-Juniper Woodland</i> • <i>Mediterranean California Mesic Mixed Conifer Forest and Woodland</i> • <i>Mediterranean California Mixed Oak Woodland</i> • <i>Northern and Central California Dry-Mesic Chaparral</i> • <i>Rocky Mountain Aspen Forest and Woodland</i> <p>Sequoia NF Representation:</p> <p>7% of this inventory unit is comprised of ecological groups that have less than five percent of their area on the Forest protected in designated wilderness.</p> <p>38% of this inventory unit is comprised of ecological groups that have less than twenty percent of their area on the Forest protected in designated wilderness.</p>
1377	<p>General location: Adjacent to Monarch Wilderness Size: 11,559 acres</p> <p>Category A: 1% of this Inventory unit is comprised of the following Category A ecological groups, which have less than five percent of their total area protected in the NWPS:</p> <ul style="list-style-type: none"> • <i>Inter-Mountain basins Big Sagebrush Steppe</i> • <i>Inter-Mountain Basins Big Sagebrush Shrubland</i> <p>Category C: 24% of this inventory unit is comprised of the following ecological groups, which have less than twenty percent of their total area protected in the NWPS:</p> <ul style="list-style-type: none"> • <i>Great Basin Pinyon-Juniper Woodland</i> • <i>Mediterranean California Mesic Mixed Conifer Forest and Woodland</i> • <i>Mediterranean California Mixed Oak Woodland</i> • <i>Rocky Mountain Aspen Forest and Woodland</i> <p>Sequoia NF Representation:</p> <p>None of this inventory unit is comprised of ecological groups that have less than five percent of their area on the Forest protected in designated wilderness.</p> <p>23% of this inventory unit is comprised of ecological groups that have less than twenty percent of their area on the Forest protected in designated wilderness.</p>
1380	<p>General location: Adjacent to Jennie Lakes Wilderness Size: 1,316 acres</p> <p>Category A: 3% of this Inventory unit is comprised of the following Category A ecological group, which has less than five percent of its total area protected in the NWPS:</p> <ul style="list-style-type: none"> • <i>Inter-Mountain Basins Big Sagebrush Shrubland</i> <p>Category C: 21% of this inventory unit is comprised of the following ecological groups, which have less than twenty percent of their total area protected in the NWPS:</p> <ul style="list-style-type: none"> • <i>Great Basin Pinyon-Juniper Woodland</i> • <i>Mediterranean California Mesic Mixed Conifer Forest and Woodland</i> • <i>Rocky Mountain Aspen Forest and Woodland</i>

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	<p>Sequoia NF Representation:</p> <p>None of this inventory unit is comprised of ecological groups that have less than five percent of their area on the Forest protected in designated wilderness.</p> <p>17% of this inventory unit is comprised of ecological groups that have less than twenty percent of their area on the Forest protected in designated wilderness.</p>
1381	<p>General location: Not adjacent to designated wilderness Size: 1,317 acres</p> <p>Category A: 1% of this Inventory unit is comprised of the following Category A ecological groups, which have less than five percent of their total area protected in the NWPS:</p> <ul style="list-style-type: none"> • <i>Inter-Mountain basins Big Sagebrush Steppe</i> • <i>Inter-Mountain Basins Big Sagebrush Shrubland</i> <p>Category C: 19% of this inventory unit is comprised of the following ecological groups, which have less than twenty percent of their total area protected in the NWPS:</p> <ul style="list-style-type: none"> • <i>Great Basin Pinyon-Juniper Woodland</i> • <i>Mediterranean California Mesic Mixed Conifer Forest and Woodland</i> • <i>Mediterranean California Mixed Oak Woodland</i> • <i>Rocky Mountain Aspen Forest and Woodland</i> <p>Sequoia NF Representation:</p> <p>None of this inventory unit is comprised of ecological groups that have less than five percent of their area on the Forest protected in designated wilderness.</p> <p>17% of this inventory unit is comprised of ecological groups that have less than twenty percent of their area on the Forest protected in designated wilderness.</p>
1384	<p>General location: Not adjacent to designated wilderness Size: 39,629 acres</p> <p>Category A: 7% of this Inventory unit is comprised of the following Category A ecological groups, which have less than five percent of their total area protected in the NWPS:</p> <ul style="list-style-type: none"> • <i>Inter-Mountain basins Big Sagebrush Steppe</i> • <i>Inter-Mountain Basins Big Sagebrush Shrubland</i> <p>Category C: 27% of this inventory unit is comprised of the following ecological groups, which have less than twenty percent of their total area protected in the NWPS:</p> <ul style="list-style-type: none"> • <i>California Central Valley Mixed Oak Savanna</i> • <i>California Lower Montane Blue Oak-Foothill Pine Woodland and Savanna</i> • <i>Great Basin Pinyon-Juniper Woodland</i> • <i>Mediterranean California Mesic Mixed Conifer Forest and Woodland</i> • <i>Mediterranean California Mixed Oak Woodland</i> • <i>Northern and Central California Dry-Mesic Chaparral</i> • <i>Rocky Mountain Aspen Forest and Woodland</i>

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	<p>Sequoia NF Representation:</p> <p>None of this inventory unit is comprised of ecological groups that have less than five percent of their area on the Forest protected in designated wilderness.</p> <p>12% of this inventory unit is comprised of ecological groups that have less than twenty percent of their area on the Forest protected in designated wilderness.</p>
<p>1385</p>	<p>General location: Adjacent to Jennie Lakes Wilderness and Sequoia and Kings Canyon NP Size: 8,216 acres</p> <p>Category A: 1% of this Inventory unit is comprised of the following Category A ecological group, which has less than five percent of its total area protected in the NWPS:</p> <ul style="list-style-type: none"> • <i>Inter-Mountain Basins Big Sagebrush Shrubland</i> <p>Category C: 1% inventory unit is comprised of the following ecological groups, which have less than twenty percent of their total area protected in the NWPS:</p> <ul style="list-style-type: none"> • <i>Great Basin Pinyon-Juniper Woodland</i> • <i>Mediterranean California Mesic Mixed Conifer Forest and Woodland</i> • <i>Rocky Mountain Aspen Forest and Woodland</i> <p>Sequoia NF Representation:</p> <p>None of this inventory unit is comprised of ecological groups that have less than five percent of their area on the Forest protected in designated wilderness.</p> <p>None of this inventory unit is comprised of ecological groups that have less than twenty percent of their area on the Forest protected in designated wilderness.</p>
<p>1387</p>	<p>General location: Adjacent to Golden Trout Wilderness Size: 89,629 acres</p> <p>Category A: 2% of this Inventory unit is comprised of the following Category A ecological groups, which have less than five percent of their total area protected in the NWPS:</p> <ul style="list-style-type: none"> • <i>Inter-Mountain basins Big Sagebrush Steppe</i> • <i>Inter-Mountain Basins Big Sagebrush Shrubland</i> <p>Category C: 26% of this inventory unit is comprised of the following ecological groups, which have less than twenty percent of their total area protected in the NWPS:</p> <ul style="list-style-type: none"> • <i>California Lower Montane Blue Oak-Foothill Pine Woodland and Savanna</i> • <i>Great Basin Pinyon-Juniper Woodland</i> • <i>Mediterranean California Mesic Mixed Conifer Forest and Woodland</i> • <i>Mediterranean California Mixed Oak Woodland</i> • <i>Northern and Central California Dry-Mesic Chaparral</i> • <i>Rocky Mountain Aspen Forest and Woodland</i> <p>Sequoia NF Representation:</p> <p>None of this inventory unit is comprised of ecological groups that have less than five percent of their area on the Forest protected in designated wilderness.</p>

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	<p>21% of this inventory unit is comprised of ecological groups that have less than twenty percent of their area on the Forest protected in designated wilderness.</p>
<p>1390</p>	<p>General location: Adjacent to Golden Trout Wilderness Size: 1,100 acres</p> <p>Category A: 4% of this Inventory unit is comprised of the following Category A ecological group, which has less than five percent of its total area protected in the NWPS:</p> <ul style="list-style-type: none"> • <i>Inter-Mountain basins Big Sagebrush Steppe</i> • <i>Inter-Mountain Basins Big Sagebrush Shrubland</i> <p>Category C: 13% of this inventory unit is comprised of the following ecological groups, which have less than twenty percent of their total area protected in the NWPS:</p> <ul style="list-style-type: none"> • <i>California Lower Montane Blue Oak-Foothill Pine Woodland and Savanna</i> • <i>Great Basin Pinyon-Juniper Woodland</i> • <i>Mediterranean California Mesic Mixed Conifer Forest and Woodland</i> • <i>Mediterranean California Mixed Oak Woodland</i> • <i>Rocky Mountain Aspen Forest and Woodland</i> <p>Sequoia NF Representation:</p> <p>None of this inventory unit is comprised of ecological groups that have less than five percent of their area on the Forest protected in designated wilderness.</p> <p>One percent of this inventory unit is comprised of ecological groups that have less than twenty percent of their area on the Forest protected in designated wilderness.</p>
<p>1394</p>	<p>General location: Adjacent to Domeland Wilderness Size: 51,801 acres</p> <p>Category A: 12% of this Inventory unit is comprised of the following Category A ecological groups, which have less than five percent of their total area protected in the NWPS:</p> <ul style="list-style-type: none"> • <i>Inter-Mountain basins Big Sagebrush Steppe</i> • <i>Inter-Mountain Basins Big Sagebrush Shrubland</i> <p>Category C: 21% of this inventory unit is comprised of the following ecological groups, which have less than twenty percent of their total area protected in the NWPS:</p> <ul style="list-style-type: none"> • <i>California Central Valley Mixed Oak Savanna</i> • <i>California Lower Montane Blue Oak-Foothill Pine Woodland and Savanna</i> • <i>Great Basin Pinyon-Juniper Woodland</i> • <i>Mediterranean California Mesic Mixed Conifer Forest and Woodland</i> • <i>Mediterranean California Mixed Oak Woodland</i> • <i>Northern and Central California Dry-Mesic Chaparral</i> • <i>Rocky Mountain Aspen Forest and Woodland</i>

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	<p>Sequoia NF Representation:</p> <p>None of this inventory unit is comprised of ecological groups that have less than five percent of their area on the Forest protected in designated wilderness.</p> <p>3% of this inventory unit is comprised of ecological groups that have less than twenty percent of their area on the Forest protected in designated wilderness.</p>
<p>1395</p>	<p>General location: Adjacent to Golden Trout Wilderness</p> <p>Size: 2,285 acres</p> <p>Category A: Less than one percent of this Inventory unit is comprised of the following Category A ecological group, which has less than five percent of its total area protected in the NWPS:</p> <ul style="list-style-type: none"> • <i>Inter-Mountain Basins Big Sagebrush Shrubland</i> <p>Category C: 4% of this inventory unit is comprised of the following ecological groups, which have less than twenty percent of their total area protected in the NWPS:</p> <ul style="list-style-type: none"> • <i>Great Basin Pinyon-Juniper Woodland</i> • <i>Mediterranean California Mesic Mixed Conifer Forest and Woodland</i> • <i>Rocky Mountain Aspen Forest and Woodland</i> <p>Sequoia NF Representation: 2% of this inventory unit is comprised of ecological groups that have less than twenty percent of their area on the Forest protected in designated wilderness. None of this inventory unit is comprised of ecological groups that have less than five percent of their area on the Forest protected in designated wilderness.</p>
<p>1397</p>	<p>General location: Not adjacent to designated wilderness</p> <p>Size: 3,104 acres</p> <p>Category A: Less than one percent of this Inventory unit is comprised of the following Category A ecological group, which has less than five percent of its total area protected in the NWPS:</p> <ul style="list-style-type: none"> • <i>Inter-Mountain Basins Big Sagebrush Shrubland</i> <p>Category C: 14% of this inventory unit is comprised of the following ecological groups, which have less than twenty percent of their total area protected in the NWPS:</p> <ul style="list-style-type: none"> • <i>Great Basin Pinyon-Juniper Woodland</i> • <i>Mediterranean California Mesic Mixed Conifer Forest and Woodland</i> • <i>Mediterranean California Mixed Oak Woodland</i> • <i>Rocky Mountain Aspen Forest and Woodland</i> <p>Sequoia NF Representation:</p> <p>None of this inventory unit is comprised of ecological groups that have less than five percent of their area on the Forest protected in designated wilderness.</p> <p>14% of this inventory unit is comprised of ecological groups that have less than twenty percent of their area on the Forest protected in designated wilderness.</p>

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1404	<p>General location: Not adjacent to designated wilderness Size: 6,068 acres</p> <p>Category A: None of this Inventory unit is comprised of a Category A ecological group.</p> <p>Category C: 38% of this inventory unit is comprised of the following ecological groups, which have less than twenty percent of their total area protected in the NWPS:</p> <ul style="list-style-type: none"> • <i>California Central Valley and Southern Coastal Grassland</i> • <i>California Lower Montane Blue Oak-Foothill Pine Woodland and Savanna</i> • <i>Great Basin Pinyon-Juniper Woodland</i> • <i>Mediterranean California Mesic Mixed Conifer Forest and Woodland</i> • <i>Mediterranean California Mixed Oak Woodland</i> • <i>Northern and Central California Dry-Mesic Chaparral</i> <p>Sequoia NF Representation:</p> <p>None of this inventory unit is comprised of ecological groups that have less than five percent of their area on the Forest protected in designated wilderness.</p> <p>38% of this inventory unit is comprised of ecological groups that have less than twenty percent of their area on the Forest protected in designated wilderness.</p>
1408	<p>General location: Not adjacent to designated wilderness Size: 48,730 acres</p> <p>Category A: 3% of this Inventory unit is comprised of the following Category A ecological groups, which have less than five percent of their total area protected in the NWPS:</p> <ul style="list-style-type: none"> • <i>Inter-Mountain basins Big Sagebrush Steppe</i> • <i>Inter-Mountain Basins Big Sagebrush Shrubland</i> <p>Category C: 35% of this inventory unit is comprised of the following ecological groups, which have less than twenty percent of their total area protected in the NWPS:</p> <ul style="list-style-type: none"> • <i>California Central Valley Mixed Oak Savanna</i> • <i>California Lower Montane Blue Oak-Foothill Pine Woodland and Savanna</i> • <i>Great Basin Pinyon-Juniper Woodland</i> • <i>Mediterranean California Mesic Mixed Conifer Forest and Woodland</i> • <i>Mediterranean California Mixed Oak Woodland</i> • <i>Northern and Central California Dry-Mesic Chaparral</i> • <i>Rocky Mountain Aspen Forest and Woodland</i> <p>Sequoia NF Representation:</p> <p>Less than one percent of this inventory unit is comprised of ecological groups that have less than five percent of their area on the Forest protected in designated wilderness.</p> <p>29% of this inventory unit is comprised of ecological groups that have less than twenty percent of their area on the Forest protected in designated wilderness.</p>

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1410	<p>General location: Not adjacent to designated wilderness Size: 8,494 acres</p> <p>Category A: 2% of this Inventory unit is comprised of the following Category A ecological groups, which have less than five percent of their total area protected in the NWPS:</p> <ul style="list-style-type: none"> • <i>Inter-Mountain basins Big Sagebrush Steppe</i> • <i>Inter-Mountain Basins Big Sagebrush Shrubland</i> <p>Category C: 15% of this inventory unit is comprised of the following ecological groups, which have less than twenty percent of their total area protected in the NWPS:</p> <ul style="list-style-type: none"> • <i>California Lower Montane Blue Oak-Foothill Pine Woodland and Savanna</i> • <i>Great Basin Pinyon-Juniper Woodland</i> • <i>Mediterranean California Mesic Mixed Conifer Forest and Woodland</i> • <i>Mediterranean California Mixed Oak Woodland</i> • <i>Rocky Mountain Aspen Forest and Woodland</i> <p>Sequoia NF Representation:</p> <p>None of this inventory unit is comprised of ecological groups that have less than five percent of their area on the Forest protected in designated wilderness.</p> <p>7% of this inventory unit is comprised of ecological groups that have less than twenty percent of their area on the Forest protected in designated wilderness.</p>
1420	<p>General location: Not adjacent to designated wilderness Size: 6,398 acres</p> <p>Category A: Less than one percent of this Inventory unit is comprised of the following Category A ecological groups, which have less than five percent of their total area protected in the NWPS:</p> <ul style="list-style-type: none"> • <i>Inter-Mountain basins Big Sagebrush Steppe</i> • <i>Inter-Mountain Basins Big Sagebrush Shrubland</i> <p>Category C: 37% of this inventory unit is comprised of the following ecological groups, which have less than twenty percent of their total area protected in the NWPS:</p> <ul style="list-style-type: none"> • <i>California Central Valley and Southern Coastal Grassland</i> • <i>California Lower Montane Blue Oak-Foothill Pine Woodland and Savanna</i> • <i>Great Basin Pinyon-Juniper Woodland</i> • <i>Mediterranean California Mesic Mixed Conifer Forest and Woodland</i> • <i>Mediterranean California Mixed Oak Woodland</i> • <i>Northern and Central California Dry-Mesic Chaparral</i> • <i>Rocky Mountain Aspen Forest and Woodland</i> <p>Sequoia NF Representation:</p> <p>None of this inventory unit is comprised of ecological groups that have less than five</p>

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	<p>percent of their area on the Forest protected in designated wilderness.</p> <p>37% of this inventory unit is comprised of ecological groups that have less than twenty percent of their area on the Forest protected in designated wilderness.</p>
1422	<p>General location: Not adjacent to designated wilderness Size: 8,008 acres</p> <p>Category A: 5% of this Inventory unit is comprised of the following Category A ecological groups, which have less than five percent of their total area protected in the NWPS:</p> <ul style="list-style-type: none"> • <i>Inter-Mountain basins Big Sagebrush Steppe</i> • <i>Inter-Mountain Basins Big Sagebrush Shrubland</i> <p>Category C: 37% of this inventory unit is comprised of the following ecological groups, which have less than twenty percent of their total area protected in the NWPS:</p> <ul style="list-style-type: none"> • <i>California Central Valley Mixed Oak Savanna</i> • <i>California Lower Montane Blue Oak-Foothill Pine Woodland and Savanna</i> • <i>Great Basin Pinyon-Juniper Woodland</i> • <i>Mediterranean California Mesic Mixed Conifer Forest and Woodland</i> • <i>Mediterranean California Mixed Oak Woodland</i> • <i>Northern and Central California Dry-Mesic Chaparral</i> • <i>Rocky Mountain Aspen Forest and Woodland</i> <p>Sequoia NF Representation:</p> <p>Less than one percent of this inventory unit is comprised of ecological groups that have less than five percent of their area on the Forest protected in designated wilderness.</p> <p>25% of this inventory unit is comprised of ecological groups that have less than twenty percent of their area on the Forest protected in designated wilderness.</p>
1425	<p>General location: Not adjacent to designated wilderness Size: 14,675 acres</p> <p>Category A: 1% of this Inventory unit is comprised of the following Category A ecological group, which has less than five percent of its total area protected in the NWPS:</p> <ul style="list-style-type: none"> • <i>Inter-Mountain Basins Big Sagebrush Steppe</i> <p>Category C: 32% of this inventory unit is comprised of the following ecological groups, which have less than twenty percent of their total area protected in the NWPS:</p> <ul style="list-style-type: none"> • <i>California Central Valley and Southern Coastal Grassland</i> • <i>California Central Valley Mixed Oak Savanna</i> • <i>California Lower Montane Blue Oak-Foothill Pine Woodland and Savanna</i> • <i>Great Basin Pinyon-Juniper Woodland</i> • <i>Mediterranean California Mesic Mixed Conifer Forest and Woodland</i> • <i>Mediterranean California Mixed Oak Woodland</i>

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	<ul style="list-style-type: none"> • <i>Northern and Central California Dry-Mesic Chaparral</i> • <i>Rocky Mountain Aspen Forest and Woodland</i> <p>Sequoia NF Representation:</p> <p>6% of this inventory unit is comprised of ecological groups that have less than five percent of their area on the Forest protected in designated wilderness.</p> <p>30% of this inventory unit is comprised of ecological groups that have less than twenty percent of their area on the Forest protected in designated wilderness.</p>
1426	<p>General location: Adjacent to Bright Star (BLM) Wilderness Size: 49,918 acres</p> <p>Category A: 7% of this Inventory unit is comprised of the following Category A ecological groups, which have less than five percent of their total area protected in the NWPS:</p> <ul style="list-style-type: none"> • <i>Inter-Mountain basins Big Sagebrush Steppe</i> • <i>Inter-Mountain Basins Big Sagebrush Shrubland</i> <p>Category C: 33% of this inventory unit is comprised of the following ecological groups, which have less than twenty percent of their total area protected in the NWPS:</p> <ul style="list-style-type: none"> • <i>California Central Valley Mixed Oak Savanna</i> • <i>California Lower Montane Blue Oak-Foothill Pine Woodland and Savanna</i> • <i>Great Basin Pinyon-Juniper Woodland</i> • <i>Mediterranean California Mesic Mixed Conifer Forest and Woodland</i> • <i>Mediterranean California Mixed Oak Woodland</i> • <i>Northern and Central California Dry-Mesic Chaparral</i> • <i>Rocky Mountain Aspen Forest and Woodland</i> <p>Sequoia NF Representation:</p> <p>None of this inventory unit is comprised of ecological groups that have less than five percent of their area on the Forest protected in designated wilderness.</p> <p>17% of this inventory unit is comprised of ecological groups that have less than twenty percent of their area on the Forest protected in designated wilderness.</p>
1427	<p>General location: Not adjacent to designated wilderness Size: 6,747 acres</p> <p>Category A: 5% of this Inventory unit is comprised of the following Category A ecological groups, which have less than five percent of their total area protected in the NWPS:</p> <ul style="list-style-type: none"> • <i>Inter-Mountain basins Big Sagebrush Steppe</i> • <i>Inter-Mountain Basins Big Sagebrush Shrubland</i> <p>Category C: 25% of this inventory unit is comprised of the following ecological groups, which have less than twenty percent of their total area protected in the NWPS:</p> <ul style="list-style-type: none"> • <i>California Lower Montane Blue Oak-Foothill Pine Woodland and Savanna</i>

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	<ul style="list-style-type: none"> • <i>Great Basin Pinyon-Juniper Woodland</i> • <i>Mediterranean California Mesic Mixed Conifer Forest and Woodland</i> • <i>Mediterranean California Mixed Oak Woodland</i> • <i>Northern and Central California Dry-Mesic Chaparral</i> • <i>Rocky Mountain Aspen Forest and Woodland</i> <p>Sequoia NF Representation:</p> <p>None of this inventory unit is comprised of ecological groups that have less than five percent of their area on the Forest protected in designated wilderness.</p> <p>17% of this inventory unit is comprised of ecological groups that have less than twenty percent of their area on the Forest protected in designated wilderness.</p>
1429	<p>General location: Not adjacent to designated wilderness Size: 2,729 acres</p> <p>Category A: Less than one percent of this Inventory unit is comprised of the following Category A ecological groups, which have less than five percent of their total area protected in the NWPS:</p> <ul style="list-style-type: none"> • <i>Inter-Mountain basins Big Sagebrush Steppe</i> • <i>Inter-Mountain Basins Big Sagebrush Shrubland</i> <p>Category C: 34% of this inventory unit is comprised of the following ecological groups, which have less than twenty percent of their total area protected in the NWPS:</p> <ul style="list-style-type: none"> • <i>Great Basin Pinyon-Juniper Woodland</i> • <i>Mediterranean California Mesic Mixed Conifer Forest and Woodland</i> • <i>Mediterranean California Mixed Oak Woodland</i> • <i>Rocky Mountain Aspen Forest and Woodland</i> <p>Sequoia NF Representation:</p> <p>None of this inventory unit is comprised of ecological groups that have less than five percent of their area on the Forest protected in designated wilderness.</p> <p>35% of this inventory unit is comprised of ecological groups that have less than twenty percent of their area on the Forest protected in designated wilderness.</p>
1431	<p>General location: Adjacent to Domeland Wilderness Size: 7,234 acres</p> <p>Category A: 7% of this Inventory unit is comprised of the following Category A ecological group, which has less than five percent of its total area protected in the NWPS:</p> <ul style="list-style-type: none"> • <i>Inter-Mountain Basins Big Sagebrush Shrubland</i> <p>Category C: 14% of this inventory unit is comprised of the following ecological groups, which have less than twenty percent of their total area protected in the NWPS:</p> <ul style="list-style-type: none"> • <i>Great Basin Pinyon-Juniper Woodland</i> • <i>Mediterranean California Mesic Mixed Conifer Forest and Woodland</i> • <i>Mediterranean California Mixed Oak Woodland</i>

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	<ul style="list-style-type: none"> • <i>Rocky Mountain Aspen Forest and Woodland</i> <p>Sequoia NF Representation:</p> <p>None of this inventory unit is comprised of ecological groups that have less than five percent of their area on the Forest protected in designated wilderness.</p> <p>None of this inventory unit is comprised of ecological groups that have less than twenty percent of their area on the Forest protected in designated wilderness.</p>
1432	<p>General location: Adjacent to Golden Trout Wilderness Size: 1,133 acres</p> <p>Category A: Less than one percent of this Inventory unit is comprised of the following Category A ecological group, which has less than five percent of its total area protected in the NWPS:</p> <ul style="list-style-type: none"> • <i>Inter-Mountain Basins Big Sagebrush Shrubland</i> <p>Category C: 3% of this inventory unit is comprised of the following ecological groups, which have less than twenty percent of their total area protected in the NWPS:</p> <ul style="list-style-type: none"> • <i>Great Basin Pinyon-Juniper Woodland</i> • <i>Mediterranean California Mesic Mixed Conifer Forest and Woodland</i> <p>Sequoia NF Representation:</p> <p>None of this inventory unit is comprised of ecological groups that have less than five percent of their area on the Forest protected in designated wilderness.</p> <p>None of this inventory unit is comprised of ecological groups that have less than twenty percent of their area on the Forest protected in designated wilderness.</p>
1434	<p>General location: Adjacent to Monarch Wilderness Size: 3,726 acres</p> <p>Category A: 1% of this Inventory unit is comprised of the following Category A ecological groups, which have less than five percent of their total area protected in the NWPS:</p> <ul style="list-style-type: none"> • <i>Inter-Mountain basins Big Sagebrush Steppe</i> • <i>Inter-Mountain Basins Big Sagebrush Shrubland</i> <p>Category C: 30% of this inventory unit is comprised of the following ecological groups, which have less than twenty percent of their total area protected in the NWPS:</p> <ul style="list-style-type: none"> • <i>California Lower Montane Blue Oak-Foothill Pine Woodland and Savanna</i> • <i>Great Basin Pinyon-Juniper Woodland</i> • <i>Mediterranean California Mesic Mixed Conifer Forest and Woodland</i> • <i>Mediterranean California Mixed Oak Woodland</i> • <i>Northern and Central California Dry-Mesic Chaparral</i> • <i>Rocky Mountain Aspen Forest and Woodland</i> <p>Sequoia NF Representation:</p> <p>None of this inventory unit is comprised of ecological groups that have less than five</p>

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	<p>percent of their area on the Forest protected in designated wilderness.</p> <p>33% of this inventory unit is comprised of ecological groups that have less than twenty percent of their area on the Forest protected in designated wilderness.</p>
<p>1391</p>	<p>General location: Adjacent to South Sierra Wilderness.</p> <p>Note – Portions of 1391 are located on both the Inyo and Sequoia NF – TWS data indicated this unit as #1458</p> <p>Size: 17,253 acres</p> <p>Category A: 7% of this inventory unit is comprised of the following Category A ecological groups, which has less than five percent of its total area protected in the NWPS:</p> <ul style="list-style-type: none"> • <i>Inter-Mountain Basins Big Sagebrush Shrubland</i> • <i>Inter-Mountain Basins Big Sagebrush Steppe</i> <p>Category C: 14% of this inventory unit is comprised of the following ecological groups, which have less than twenty percent of their total area protected in the NWPS:</p> <ul style="list-style-type: none"> • <i>Great Basin Pinyon-Juniper Woodland</i> • <i>Mediterranean California Mesic Mixed Conifer Forest Mediterranean California Mixed Oak Woodland</i> • <i>Northern and Central California Dry-Mesic Chaparral</i> • <i>Rocky Mountain Aspen Forest and Woodland</i> <p>Sequoia NF Representation: None of this inventory unit is comprised of ecological groups that have less than five percent of their area on the Forest protected in designated wilderness.</p> <p>Less than 1% of this inventory unit is comprised of ecological groups that have less than twenty percent of their area on the Forest protected in designated wilderness.</p>

Exhibit 3: Excerpt from Comments Submitted by The Wilderness Society et al to the Gila National Forest on the Draft Evaluation Process Paper, December 20, 2017

Draft Evaluation Process Paper

Overall, we found the draft evaluation process paper to provide a clear and transparent articulation of the methodology and criteria the Forest Service intends to use in the wilderness evaluation, and we believe most elements of the paper are consistent with the Chapter 70 directives. We do have significant concerns, however, with the forest’s proposed approach for evaluating manageability, as well as several other concerns that are discussed below.

Manageability

We are concerned that the evaluation of a unit’s manageability (Step 2) prior to the evaluation of its wilderness characteristics (Steps 3-5) – and the proposed approach of ceasing the evaluation for areas determined to be “not manageable” – gives the manageability criterion undue weight and focus and is contrary to the requirement to evaluate “all lands identified in the inventory.” FSH 1909.12, ch. 70, § 72.1. We have seen forests around the country struggle to properly apply the manageability criterion and do not want the Gila to repeat those mistakes. We assume the forest’s suggested approach of ceasing the evaluation for areas determined to be “not manageable” is designed to enhance efficiency. In practice, however, that approach will likely have the opposite effect, where challenges to a finding that an area is not manageable would require the Forest Service to go back and complete the evaluation of the area, and then provide additional opportunity for public input on the new components of the evaluation. A more defensible approach would be to evaluate manageability after the evaluation of apparent naturalness, outstanding opportunities for solitude or primitive and unconfined recreation, and supplemental values. That approach would be consistent with the Chapter 70 directives, which list manageability as the fifth and final evaluation criterion, and which require a full evaluation of all inventoried areas. Indeed, the purpose of the Chapter 70 evaluation is to evaluate the wilderness characteristics of each area included in the inventory based on the criteria set forth in the Wilderness Act of 1964. Manageability is not a criterion in the Wilderness Act and should not be used to disqualify areas that otherwise possess wilderness characteristics.

We are also concerned by the binary approach of determining each area to be manageable or not manageable. Like the other evaluation criteria, an area’s manageability will generally fall on a spectrum. For that very reason, the Chapter 70 directives require the Forest Service to “evaluate *the degree* to which the area may be managed to preserve its wilderness characteristics.” FSH 1909.12, ch. 70, § 72.1(5) (emphasis added). For instance, an area’s shape or configuration may make management to preserve wilderness characteristics more difficult, but rarely would it make an area that is otherwise suitable for inclusion in the National Wilderness Preservation System “not manageable.” Moreover, because most manageability concerns can be addressed through boundary adjustments, ceasing the evaluation of the entire area as “not manageable” would be illogical. Instead, the Forest Service should articulate a ranking system for manageability similar to that used for the other evaluation criteria. It will be important that any point system assigned to the various rankings not be given undue weight such that a moderate or low manageability score would be determinative of the overall unit ranking. If an area is truly not manageable based on the factors listed in section 72.1(5) of the Chapter 70 directives, then we support the Forest Service denoting that as part of the overall unit ranking and not carrying the area forward for analysis, but that will be an extremely rare occurrence.

In evaluating manageability, it will also be important that the Forest Service does not confuse “manageability” with the sorts of “management trade-offs” that are properly considered during the analysis phase of Chapter 70. The draft evaluation process paper properly lists the five factors from section 72.1(5) of the Chapter 70 directives to consider when evaluating manageability: (a) shape and configuration of the area; (b) legally established rights or uses within the area; (c) specific Federal or State laws that may be relevant to availability of the area for wilderness or the ability to manage the area to protect wilderness characteristics; (d) the presence and amount of non-Federal land in the area; and (e) management of adjacent lands. As these factors highlight, the evaluation of manageability is meant to address the geographical shape and configuration of the area and any governing legal requirements – *not* existing or proposed uses or activities that might be inconsistent with wilderness management. The latter are better characterized as management trade-offs that should be analyzed in the plan EIS. For instance, consideration of how to balance things like motorized recreational opportunities or the need for more active forest management with protection of wilderness characteristics is a management trade-off that should be analyzed in the EIS and is not an appropriate consideration at the evaluation stage or in determining areas to carry forward for NEPA analysis. While the draft evaluation process paper appears to properly limit the evaluation of manageability to appropriate considerations, making it clear that those sorts of management trade-offs will be considered in the analysis phase would aid in public transparency.

Ceasing evaluation due to a ranking of “NONE”

Similar to our concern with ceasing the evaluation for areas found to be not manageable, we are concerned with the Forest Service’s proposed approach of ceasing the evaluation for areas ranked “NONE” for apparent naturalness or for opportunities for solitude or primitive and unconfined recreation. This approach is contrary to the requirement in Chapter 70 to evaluate all areas included in the inventory, and may result in significant inefficiencies where a ranking of NONE is subsequently challenged and the Forest Service is required to go back and complete the remainder of the evaluation. Moreover, a lack of naturalness or opportunities for solitude or primitive and unconfined recreation can, as a practical matter, usually be addressed through boundary adjustments. It is unclear how the approach of ranking an area as NONE and ceasing the evaluation would account for this obvious solution, and the draft evaluation process paper does not speak to this issue. The final evaluation process paper should make clear that all areas included in the final inventory will be fully evaluated, and that those areas or portions of areas that do not possess sufficient wilderness characteristics (e.g., those ranked NONE for apparent naturalness and/or for *both* opportunities for solitude and primitive and unconfined recreation) will not be carried forward for analysis in the plan EIS.

For the same reasons, we caution the Forest Service against ceasing the evaluation of areas determined not to be of sufficient size (Step 1). While we do not anticipate that this will occur – given that the draft inventory does not include areas less than 5,000 acres that are not contiguous to designated wilderness – a more defensible approach would be to complete the evaluation of the area, but not carry it forward for analysis in the plan EIS.

Opportunities for solitude

When evaluating opportunities for solitude, we have often seen forests struggle with how to address the sights and sounds of human activities. In particular, there is an important distinction between sights and sounds originating outside the unit, as opposed to those originating from within the unit. That is

because wilderness character is evaluated from the perspective of an average visitor within the unit, or standing at the edge of the unit looking in – not standing within the unit or at the boundary looking out. Thus, outside sights and sounds are relevant to the evaluation of opportunities for solitude only to the extent that they are “pervasive and influence a visitor’s opportunity for solitude” throughout the unit. FSH 1909.12, ch. 70, § 72.1(2)(a).¹The fact that many designated and recommended wilderness areas around the country are bordered by high-traffic roads or are within sight of large metropolitan areas reinforces this interpretation. The attached 2006 essay by Doug Scott provides pertinent legislative history in support of this “outside sights and sounds” doctrine.

The Gila’s draft evaluation process paper is not clear on this issue. The ranking classifications for opportunities for solitude refer simply to “sights and sounds of human activities,” which could be interpreted to encompass outside sights and sounds. To address this issue, the final evaluation process paper should refer to “sights and sounds of human activities originating within the unit.” To account for any pervasive sights and sounds originating from outside the unit, the rankings for LOW and NONE could include additional bullet points that state: “sights and sounds of human activity originating from outside the unit are pervasive throughout most of the unit” (for LOW), and “sights and sounds of human activity originating from outside the unit are pervasive throughout the entire unit and impossible to avoid” (for NONE).

Opportunities for primitive and unconfined recreation

We are confused by the ranking classification criteria addressing “limitations to visitor use.” Chapter 70 does not refer to such considerations, and we do not see how or why they would be relevant. For instance, we are unsure what “regulations and restrictions to entry” might apply to the areas included in the inventory and how or why they would restrict or enhance opportunities for primitive and unconfined recreation. Indeed, areas where visitor access is difficult may provide some of the best opportunities for truly primitive forms of recreation. At the same time, more accessible areas can also provide outstanding opportunities for primitive and unconfined recreation. Relatedly, we do not understand how potential future “additional limitations to visitor use [that] are required to protect wilderness characteristics” are relevant to the evaluation of current opportunities for primitive and unconfined recreation. This criterion improperly integrates hypothetical future wilderness management considerations into the evaluation of opportunities for primitive and unconfined recreation. Moreover, many wilderness areas around the country that require permit systems or limitations on visitor use also boast some of the best opportunities for primitive and unconfined recreation in the National Wilderness Preservation System – places like the Boundary Waters Canoe Area Wilderness, popular wilderness areas along Colorado’s front range or central mountains, and national park wilderness. In short, the amount of use does not dictate whether outstanding recreational opportunities exist. The final evaluation process paper should remove criteria focused on limitations to visitor use or other factors related to the amount of use. Instead, the Forest Service should focus the evaluation on the extent to which the unit provides visitors with opportunities to engage in dispersed, undeveloped recreational activities that lead to a visitor’s ability to feel a part of nature.

Supplemental values

¹ See also Bureau of Land Management Manual (BLM) 6310.06(C)(2)(c)(i)(1) (“Only consider the impacts of sights and sounds from outside the inventory area on the opportunity for solitude if these impacts are pervasive and omnipresent.”).

We support the examples of supplemental values provided in the draft evaluation process paper. However, it is important that the final paper make clear that the list of examples is not comprehensive. Simply adding the phrase “examples include but are not limited to” prior to the bullet points would provide adequate clarification.

Conclusion

Thank you for the opportunity to provide input on the draft inventory maps and draft evaluation process paper. Overall, we found these products to be well done and appreciate the thought and effort that clearly went into them. By addressing the issues identified above, we believe the final inventory maps and evaluation process paper will be of exceptional quality and entirely consistent with the Chapter 70 directives. We look forward to further discussion and engagement in the Chapter 70 process. Please contact Alison Flint or Nathan Newcomer with any questions.

APPENDIX A

CONGRESSIONAL GUIDANCE ON OUTSIDE SIGHTS AND SOUNDS¹ WRITTEN BY DOUG SCOTT, 2006

This idea of outside sights and sounds as a criterion for whether each acre qualified as wilderness has no basis in the Wilderness Act, its legislative history, or how Congress has subsequently applied it.

First, the word “sight” does not appear in the Act. The word “sound” appears once, in a technical provision having to do with mining claims, and not in the sense of auditory phenomenon.

Second, were this idea to be taken seriously, it would disqualify, for example, almost all of the 228,480 acres of wilderness Congress designated in Mount Rainier National Park in 1988, leaving just the deep canyons, crevasses, and summit crater as qualified for wilderness—for these are the only portions of the park from which clearcuts and towns outside the park, and the roads and facilities within the park, are not visible.

The Legislative Intent of the Authors of the Wilderness Act Definition.

In fact, Congress was very explicit in rejecting the notion of outside influences disqualifying land as wilderness. Looking back at the Act’s section 2(c) definition, wilderness is among other things “an area of undeveloped Federal land retaining its primeval character and influence.” Note that these words, and the others in this subsection, all pertain to the *entity* of wilderness itself, not its surroundings. That is no accident, but the conscious intent of the senator who wrote those words.

In early versions of the bill that became the Wilderness Act, the wording of this phrase was slightly different: “areas . . . retaining their primeval *environment* and influence.” In July 1960, Senator James Murray (D-MT), introduced a new revision of the Wilderness Bill he had earlier introduced.² Senator Murray was the lead sponsor and the chairman of the committee handling the bill; his stated intent is definitive legislative history. In introducing his revised version of his own bill, he carefully explained to the Senate a key word change:

In the opening sentence of the bill change the word “environment” (line 9) to “character” and delete the words “recreational, scenic, scientific, educational, conservation, and historical.”

¹ This section was written by Doug Scott, a wilderness historian with the Campaign for America’s Wilderness, in comments to the Green Mountain National Forest on their proposed forest plan revision.

² S. 3809, 86th Congress. Throughout its eight-year consideration by Congress, the legislation was commonly referred to as “the Wilderness Bill.” Sen. Murray’s explanations are prime documentation of the congressional intent behind the words of the final Act.

Explanation: These are amendments pending before the Interior Committee. *The word “character” is substituted because “environment” might be taken to mean the surroundings of the wilderness rather than the wilderness entity.*³

As Senator Murray’s explanation illustrates, the authors of the Wilderness Act took great care to document precise guidance on their legislative intent in choosing the words in the law. They did not want the *qualification* of land that might be designated as wilderness to be decided on the basis of the surrounding **environment** and any impacts from outside the boundary, even immediately outside the boundary. Rather, they specified that the test was the **character** of the wilderness entity itself.

Later, when some agencies misapplied this aspect of the Wilderness Act to assert that outside sights and sounds led them to judge lands not qualified for wilderness, Senator Frank Church (D-ID), who had been the floor manager when the Senate debated and passed the Act, reminded them of Sen. Murray’s definitive explanation at a Senate hearing:

The Wilderness Act calls for the designation of suitable wild lands which are of wilderness “character.” This term “wilderness character” applies only to the immediate land involved itself, not to influences upon it from outside areas. This point was specified precisely in an early amendment to the wilderness bill... What [Sen. Murray’s 1960] amendment made clear is that the suitability of *each acre of possible wilderness* is to be ascertained on the basis of that wilderness entity, not on the basis of insubstantial outside influences. *Sights and sounds from outside the boundary do not invalidate a wilderness designation or make threshold exclusions necessary, as a matter of law.*⁴

Despite Senator Church’s clarification, use of the erroneous sights and sounds criterion recurred. The issue came to a head during congressional action on the Endangered American Wilderness Act of 1978, sponsored by Representative Morris K. Udall (D-AZ) and Senator Church.⁵ Like Church, Udall had been involved in the enactment of the Wilderness Act [both were at President Lyndon Johnson’s side as he signed the Act] and was, in 1978, chairman of the House committee handling all wilderness legislation. In its formal report to the House of Representatives explaining the 1978 bill, Udall’s Committee on Interior and Insular Affairs discussed the Forest Service’s renewed use of the sights and sounds concept:

Testimony presented during nine days of Subcommittee hearings on H.R. 3454 repeated allegations that the Forest Service has been unduly restrictive in setting wilderness evaluation criteria which relied solely on the most stringent possible interpretation of the definition section (section 2(c)) of the Wilderness Act.

... many areas, including the Lone Peak and Sandia Mountain proposals⁶ in H.R. 3454, received lower wilderness quality ratings because the Forest Service

³ Ibid., emphasis added.

⁴ *Preservation of Wilderness Areas*, Hearings before the Subcommittee on Public Lands, Committee on Interior and Insular Affairs, U.S. Senate, on S. 2453 and Related Wilderness Bills, May 5, 1972, page 59, emphasis added.

⁵ Public Law 95-237; February 24, 1978.

⁶ Areas subsequently designated as wilderness in the 1978 law.

implemented a “sights and sounds” doctrine which subtracted points in areas where the sights and sounds of nearby cities (often many miles away) could be perceived from anywhere within the area. This eliminated many areas near population centers and has denied a potential nearby high quality wilderness experience to many metropolitan residents, and is inconsistent with Congress[‘s] goal of creating parks and locating wilderness areas in close proximity to population centers. The committee is therefore in emphatic support of the Administration’s decision to immediately discontinue this “sights and sounds” doctrine.⁷

During Senate hearings on the Endangered American Wilderness Act, Dr. M. Rupert Cutler, the Assistant Secretary of Agriculture, assured the Senator Pete Domenici (R-NM), who raised the same concern about agency views on the Sandia Mountain Wilderness proposal, that in relation to that area and all wilderness areas:

there is no reference in the Wilderness Act to criteria for wilderness that includes such things as the sights, sounds, and smells of civilization which is a set of criteria which has been misapplied to wilderness areas.⁸

Other examples abound. In an earlier case, the National Park Service proposed to exclude a large expanse of the Lava Beds National Monument, California, from wilderness designation because from throughout that roadless land one could see, in the distance, “the rectilinear land forms of agriculture” (e.g. cultivated hay fields). In 1972 Congress rejected that concept and designated the entire area as wilderness.⁹ Similarly, a portion of the wilderness boundary within Joshua Tree National Monument,¹⁰ California, originally designated in 1976, abuts a maintenance area. The Senate Interior Committee explained:

A boundary adjustment in the Indian Cove area is designed to exclude the existing maintenance area from the wilderness, but *the wilderness line is located on the very edge of the maintenance area* on its east and north sides.¹¹

Congress brings wilderness boundaries to the edge of human development precisely in order to best protect the maximum area of wildlands by statute. The boundary of the Pusch Ridge Wilderness, as designated in 1978, is instructive. This area reaches right to the city limits of Tucson, Arizona. One glance at the boundary map makes it clear that sights and sounds is not used as a wilderness criterion by Congress.

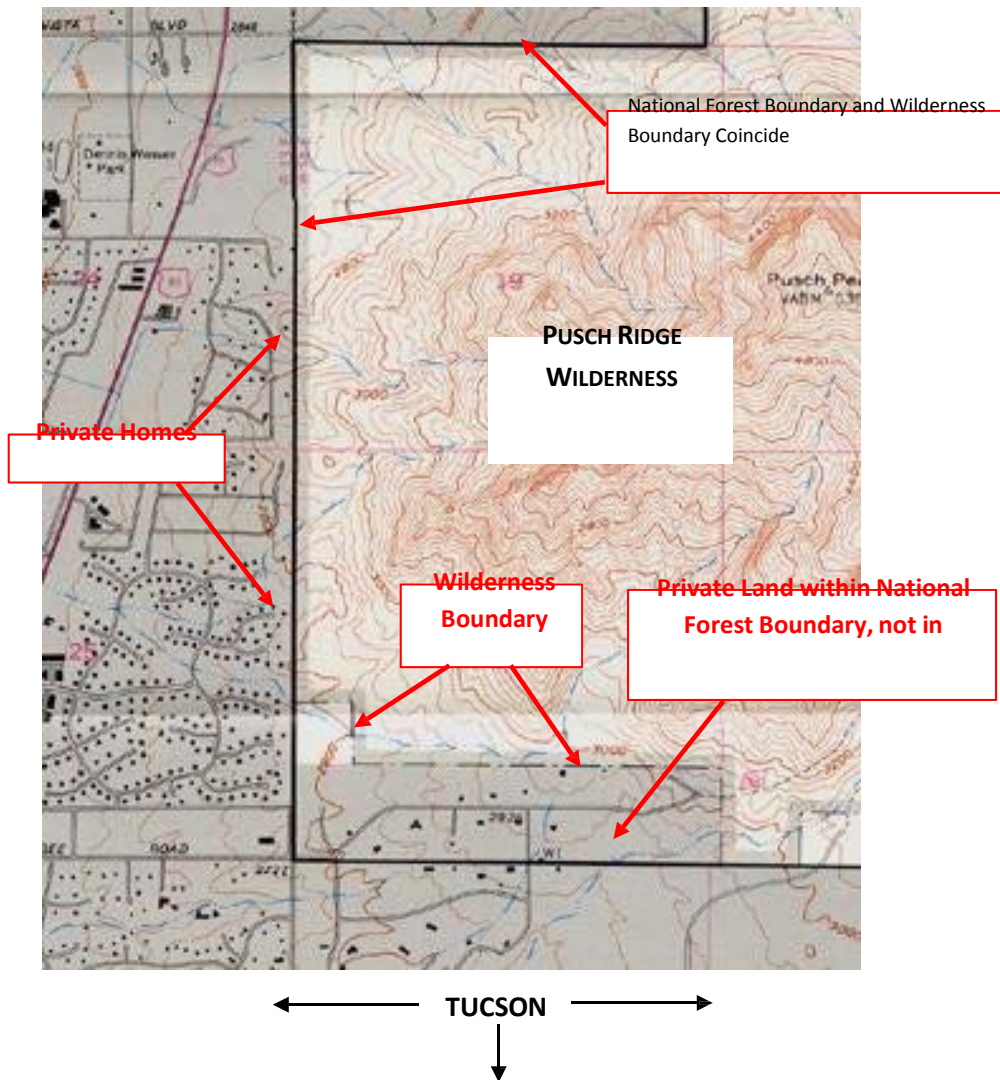
⁷ House Report 95-540, 95th Congress, July 27, 1977, page 5, emphasis added.

⁸ *Endangered American Wilderness Act of 1977*, Hearings before the Subcommittee on Parks and Recreation of the Committee on Energy and Natural Resources, United States Senate on S. 1180, September 19 & 20, 1977, Publication No. 95-88, Committee on Energy and Natural Resources, page 41.

⁹ Public Law 92-493, 86 Stat. 811.

¹⁰ Now Joshua Tree National Park. The initial wilderness was designated by Public Law 94-567; 90 Stat. 2693.

¹¹ *Wilderness Designations with Units of the National Park System*, Senate Report 94-1357, September 29, 1976, page 6, emphasis added.



There is a danger that the use of arbitrary criteria, or criteria not following the Wilderness Act and the precedents of the Congress, could unfairly constrain public review by misleading the public as to what lands can or cannot be recommended to Congress as wilderness.

The topics of perceived solitude (or lack thereof) and outside sights and sounds have had a particular history of inappropriate use as the basis for assertions as to whether a particular area, or portion of an area, can qualify for congressional designation. Congress has repeatedly had to correct those who have misused these as wilderness criteria. Such misuse can easily undermine the fairness of agency evaluations in such processes as inventorying roadless areas, an in evaluation of wilderness potential in BLM Resource Management Plans or revisions of National Forest Plans. Beyond discouraging the public from appreciating that wilderness protection is indeed possible for such lands, the misuse of these criteria could result in inadvertently preempting the prerogatives of the Congress.



The world's largest wilderness protection network after 50 years: An assessment of ecological system representation in the U.S. National Wilderness Preservation System



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ABSTRACT

Protected areas, such as wilderness, form the foundation of most strategies to conserve biological diversity. However, the success of protected areas in achieving conservation goals depends partly on how well ecological diversity is represented in a network of designated lands. We examined how well the world's largest highly-protected conservation network—the U.S. National Wilderness Preservation System (NWPS)—currently represents ecological systems found on federal lands in the contiguous United States and how ecological system representation has accumulated over the 50-year tenure of the Wilderness Act (passed in 1964 and giving the U.S. Congress authority to establish wilderness areas). Although the total area of NWPS has risen fairly steadily since 1964, the diversity of ecological systems accumulated in wilderness areas (436 ecological systems) reached an asymptote 30 years ago that is well below the total pool of ecological systems available (553) on federal lands. Thus, NWPS currently under-represents ecological system diversity. Additionally, only 113 ecological systems are represented at more than 20% of federal land area. As the designation of new wilderness areas becomes more difficult, it is important to increase the ecological representation of those areas to achieve greater protection of biological diversity. Over the next 50 years of the Wilderness Act, federal land-management agencies and the U.S. Congress could increase the ecological diversity of wilderness areas by prioritizing under-represented ecological systems in new wilderness legislation.

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1. Introduction

Wilderness and other protected areas are the cornerstones of most regional, national, and international efforts to conserve biological diversity and sustain ecological processes of natural ecosystems (Bertzky et al., 2012). Protected areas are effective in reducing the loss, degradation, and fragmentation of natural habitats (Bruner et al., 2001; Naughton-Treves et al., 2005) and slowing the rate of extinction of threatened species that occur therein (Butchart et al., 2012). Recognizing the importance of protected areas for biodiversity conservation, the Convention on Biological Diversity (CBD) calls for at least 17% of the world's terrestrial areas to be conserved by 2020 (Woodley et al., 2012).

Protected areas can best achieve biodiversity goals if they are located in the right places—that is, they are representative of all ecosystems. The “representation” approach to conservation assumes that for protected areas to conserve genetic, species, and community diversity—as well as the structure, function, and evolutionary potential of natural systems—they must encompass the full variety of ecosystem types across their geographic range (Olson and Dinerstein, 1998; Margules and Pressey, 2000). Ecosystems are typically classified hierarchically by the principal vegetation communities that are found there. Protection of vegetation communities will help to protect the species that rely on them and the natural ecological processes that are characteristic of those communities (Rodrigues et al., 2004; Bunce et al., 2013). CBD has developed several indicators to evaluate the ecological representativeness of the global protected areas network, one of which is the percentage of ecosystem types (or vegetation communities) protected by 2020 (Woodley et al., 2012).

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As we commemorate the 50th anniversary of The Wilderness Act (signed into law on September 3, 1964), it is important to take inventory of the lands that have been designated as wilderness and evaluate how well the U.S. National Wilderness Preservation System (NWPS) represents the ecological diversity of America's publicly-owned federal lands—lands from which wilderness areas are exclusively designated. NWPS is a collection of federally-managed lands designated by Congress as 'wilderness areas'—"where the earth and its community are untrammelled by man, where man himself is a visitor who does not remain"—that are "protected and managed so as to preserve... natural conditions" ([The Wilderness Act, 1964](#)).

Why is it important to evaluate ecological diversity of the wilderness system in isolation from other protected areas in the U.S.? There are three principal reasons.

First, the laws, regulations, management, and other circumstances surrounding the wilderness preservation system make it especially valuable for conservation of biological diversity. Wilderness has an exceptionally high level of protection from human-caused disturbance. Wilderness areas are free of many anthropogenic stressors, including road-building, logging, mining, oil and gas drilling, hydraulic fracturing, solar and wind energy development, agriculture, irrigation, fuel-powered tools, off-road motor-vehicles, snowmobiles, non-motorized mechanical transport, developed tourism facilities, and permanent structures ([The Wilderness Act, 1964](#)). Most other "protected" areas allow a greater degree of human use (e.g., gift shops, hotels, paved roads, and skating rinks in national parks), resource extraction (e.g., copper mining in national forests), or land conversion (e.g., cultivated cornfields in national wildlife refuges) that may negatively affect species that occur there. In recognition of their high degree of protection, the U.S. Geological Survey assigns wilderness areas a default GAP Status of 1—the highest rank ([USGS, 2012](#)). In addition, the International Union for Conservation of Nature (IUCN) classifies U.S. wilderness as category 1b—which, along with 1a, is the highest classification-level of protection ([IUCN & UNEP, 2014](#)). The primary objective of 1b areas (i.e., "wilderness areas") is "to protect the long-term ecological integrity of natural areas that are undisturbed by significant human activity, free of modern infrastructure, and where natural forces and processes predominate, so that current and future generations have the opportunity to experience such areas" ([Dudley, 2008](#)).

Although there are a few other types of protected areas in the U.S. that are classified as both GAP 1 and IUCN 1 (e.g., Research Natural Areas), they are generally small and often located inside of wilderness area boundaries. In contrast, wilderness areas, with minor exceptions such as islands, are a minimum of 2023 ha (5000 acres) each, and most are much larger ([Wilderness Institute, 2014](#)). The largest single wilderness unit in the contiguous U.S. (Death Valley Wilderness, California and Nevada) is more than 1.2 million ha. The large size of wilderness areas allows many of them to sustain large-scale natural processes (such as wildfire) and provide large, un-fragmented core areas which are essential for animal migrations, top-level predator-prey relationships, and habitat for wide-ranging, low-density animal species. The U.S. National Wilderness Preservation System is the largest national system of category-one protected lands in the world ([IUCN & UNEP, 2014](#)). Nearly 1 in 5 ha (18%) of all category-one protected areas and over one third (37%) of category-1b areas worldwide are in NWPS ([IUCN & UNEP, 2014](#)). Because NWPS is the world's largest category-one protected area system ([IUCN & UNEP, 2014](#)), the degree of ecological representation of these areas is globally important.

Second, the NWPS operates from the original law passed 50 years ago, which provides continual opportunities for expansion in a systematic way. Every U.S. Congress since 1964 has considered bills to designate additional areas to the system ([Wilderness](#)

[Institute, 2014](#)), and all four federal land-management agencies are required by law to evaluate the need for new wilderness areas during their land and resource management planning processes. In contrast, there is no systematic, consistent, national-scale, legally-mandated process for creating new wildlife refuges, national parks, or national monuments.

Third, there exists an inventory of potentially suitable federal lands—roadless lands possessing wilderness characteristics—that are eligible for wilderness designation ([The Wilderness Act, 1964](#)). This type of standard process does not exist for other protected areas. Knowing which ecological systems are currently well-represented and which are under-represented in wilderness allows us to rank each potential new wilderness area based on how much it would increase ecological representation within the wilderness system. Representation analysis of the wilderness system, therefore, has real and practical applications for land managers and conservation organizations.

The wilderness system in the U.S. is uniquely managed, large, highly protected, and expandable in a systematic way. Therefore, there is great value in assessing ecological representation in the wilderness system by itself, in addition to assessing the entire protected area network.

We are building upon previous studies of ecological representation. Sixteen years ago, [Loomis and Echohawk \(1999\)](#) examined high-level vegetation communities' representation in wilderness designations—as a proportion of all lands, public and private—at the scale of [Bailey's \(1995\)](#) province-level ecoregional boundaries. Loomis' and Echohawk's study, in addition to being out of date, has two major limitations.

First, it examined representation of ecoregions at the province-level scale, which are too large to be helpful in prioritizing where to designate new wilderness areas (because those decisions are generally made at smaller scales, e.g., U.S. Congressional districts or national forests) and too broad to ensure that vegetation types which provide habitat for particular threatened, rare, or sensitive species are protected at a scale that is relevant to those species. Biological diversity is best associated with ecological system classification, rather than biomes or realms ([Olson et al., 2001](#)), which reflect large-scale patterns of climate and geography, but do not reflect species-level diversity. Second, their study examined ecological representation in wilderness only as a proportion of *all* lands in the U.S., which does little to help us understand how designating and managing *federal* lands will most efficiently and effectively increase under-represented vegetation classes. For example, knowing that tallgrass prairies are under-represented in NWPS does not help in prioritizing where to designate future wilderness areas, as virtually no wild tallgrass prairie lands are in federal public ownership, and private or state lands are not eligible for national wilderness designation.

One impediment that once precluded a nationwide ecological representation approach to wilderness designation and management in the contiguous 48 United States has recently been overcome with the availability of national-level, consistent, fine-scale data for vegetation communities, classified at multiple hierarchical levels ([Aycrigg et al., 2013](#)). The finest scale at which vegetation community data are available and consistent across the contiguous U.S. is at the level of "ecological system"—which is the term we use when referring to our analysis of ecological representation of vegetation communities. We examined, for the contiguous 48 United States (hereafter, simply, "United States"), which terrestrial ecological systems are represented in NWPS in relation to terrestrial ecological systems found on federal lands ([Figs. S1 and S2](#)). Specifically, we asked the following questions:

- (1) For each ecological system in the United States, what percent of federal land area is in the wilderness system?

- (2) What is the diversity of ecological systems currently in the wilderness system compared to the diversity of federal lands and to the diversity of all U.S. lands?
- (3) How has total area and diversity of ecological systems in wilderness accumulated over the past 50 years?
- (4) What is the relationship between rarity of ecological systems and how well they are represented in wilderness?

2. Materials and methods

To delineate ecological systems and their boundaries, we used U.S. Geological Survey Gap Analysis Program (GAP) national land-cover data version 2 (USGS, 2011), which provides seamless, detailed (30 m resolution; 1 ha minimum mapping unit) information on vegetation communities and land use patterns of the contiguous United States. GAP land-cover data combines data from previous GAP projects in the Southwest, Southeast, and Northwest United States, recently updated GAP California data, and data from the LANDFIRE project (for the Midwest and the Northeast). These national land-cover data were based on consistent satellite imagery (acquired between 1999 and 2001), digital elevation model derived datasets, and a common classification system to model natural and semi-natural vegetation. The land-cover data contain several nested hierarchical levels of vegetation community classifications which can be “cross-walked” to the six highest levels of the National Vegetation Classification System (NVCS, 2008)—the foundation of the most detailed, consistent map of vegetative associations available for the U.S.

We analyzed ecological representation in wilderness at the 6th level (the finest scale at which consistent, spatially-explicit GAP land-cover data are available) of the NVCS, which is hierarchically ordered as follows: 1. Class; 2. Subclass; 3. Formation; 4. Division; 5. Macrogroup; 6. Group (a.k.a. “Ecological System” in GAP terminology); 7. Alliance; and 8. Association.

We use the GAP terminology—“ecological system”—throughout this paper. The United States contains 576 ecological systems, 8 of which are highly-human-modified (we refer to them as “developed” in the main text): developed, high intensity; developed, medium intensity; developed, low intensity; developed, open space; cultivated cropland; pasture/hay; orchards, vineyards, and other high-structure agriculture; quarries, mines, gravel pits, and oil wells. Another 3 ecological systems are classified as “open water”: fresh; brackish/salt; aquaculture. For all analyses, we focused only on the 565 non-developed, non-open-water classes of ecological systems.

We obtained spatial data on the boundaries of the National Wilderness Preservation System from wilderness.net (Wilderness Institute, 2014), which maintains the most up-to-date spatial data on wilderness areas. To map federal land area, we used the U.S. Protected Areas Database (PAD-US) version 1.3 (USGS, 2012), which is a geodatabase of the national inventory of terrestrial and marine protected areas that are dedicated to the preservation of biological diversity and to other natural, recreation, and cultural uses, managed for these purposes through legal or other effective means. The geodatabase includes geographic boundaries, land ownership, land management, management designation, parcel name, area, and protection category.

Questions 1 and 2: We overlaid wilderness and all federal lands with ecological systems in a Geographic Information System (ArcGIS 10.2) to calculate the total area of each ecological system within wilderness and federal lands. Because wilderness areas are designated exclusively from federal lands, we calculated “ecological system representation” in wilderness using Eq. (1).

$$\frac{\text{area of the ecological system in NWPS}}{\text{area of the ecological system on federal lands}} \times 100 \quad (1)$$

For example, when we say “boreal aspen-birch forest has 19% representation in wilderness”, we mean that 19% of all federal land of that ecological system type is protected as wilderness in NWPS. After calculating ecological system representation, we mapped each ecological system according to its level of representation across all lands, federal and non-federal (Fig. 1A), and across federal lands only (Fig. 1B). We did the former because we believe it is interesting to know where well-represented and under-represented ecosystems exists across the entire U.S., regardless of whether they are on federal land, so that we are able to see broad patterns of geographic distribution of those ecosystem types. We also provide a map of ecosystem representation on federal lands only—to show how well ecosystems that occur on federal lands have been represented in the wilderness system and to isolate those areas that are eligible to be added to the wilderness system and which, if added, would increase ecological representation.

Question 3: We used the “specaccum” (i.e., species accumulation) function in the vegan package of R v. 3.0.2 (Oksanen et al., 2013; R Core Team, 2014) to calculate ecological system accumulation curves within wilderness since 1964. We investigated accumulation of new ecological systems in wilderness based on presence (i.e., an ecological system is accumulated if at least 1 ha of its area was represented in a wilderness area), as well as accumulation of ecological systems after achieving a 5% or 20% ecological system representation threshold. We chose those thresholds to evaluate “representation” over a wide range of values.

Question 4: We plotted and regressed the percent representation of each ecological system against the log of total area occurring on federal land to investigate whether commonness of ecological systems is related to their level of representation in wilderness. To map patterns of total area and representation simultaneously, we also classified ecological systems as “rare” (<100,000 ha on federal land) or “common” (>100,000 ha on federal land) and “well-represented” (>20% in NWPS) or “under-represented” (<20% in NWPS). We expected that common ecological systems on federal land are more likely than rare ecological systems to be well represented in NWPS. We mapped the results across all lands, federal and non-federal, and across federal lands only.

3. Results

The National Wilderness Preservation System (20,993,174 ha) encompasses 12.6% of federal land area and 2.6% of all land area (including inland water-bodies) in the U.S. Wilderness is designated on lands managed by the U.S. Forest Service (12,377,445 ha; 59% of all wilderness hectares), the National Park Service (4,098,734 ha; 20%), the Bureau of Land Management (BLM; 3,496,208 ha; 17%), and the U.S. Fish and Wildlife Service (789,706 ha; 4%). A comparatively small number of wilderness hectares are classified as “non-federal” lands, as these are private in-holdings that have not yet been acquired by the managing agencies. The proportion of each public land type designated as wilderness varies greatly: approximately 40% of national park lands are designated wilderness, 18% of national forest lands, 16% of national wildlife refuge lands, and 5% of BLM lands (Fig. S1).

In the 50 years of the Wilderness Act, 690 wilderness units have been designated, representing 436 ecological systems. In comparison, the U.S. contains 565 ecological systems (Fig. S2; Table S1), 553 of which are found on federal lands, leaving 117 ecological systems (21.2%) unrepresented in NWPS. Moreover, some ecological systems are only nominally represented in wilderness. Therefore, we calculated the number of ecological systems with more than 5% of federal land area in wilderness and more than 20% of federal

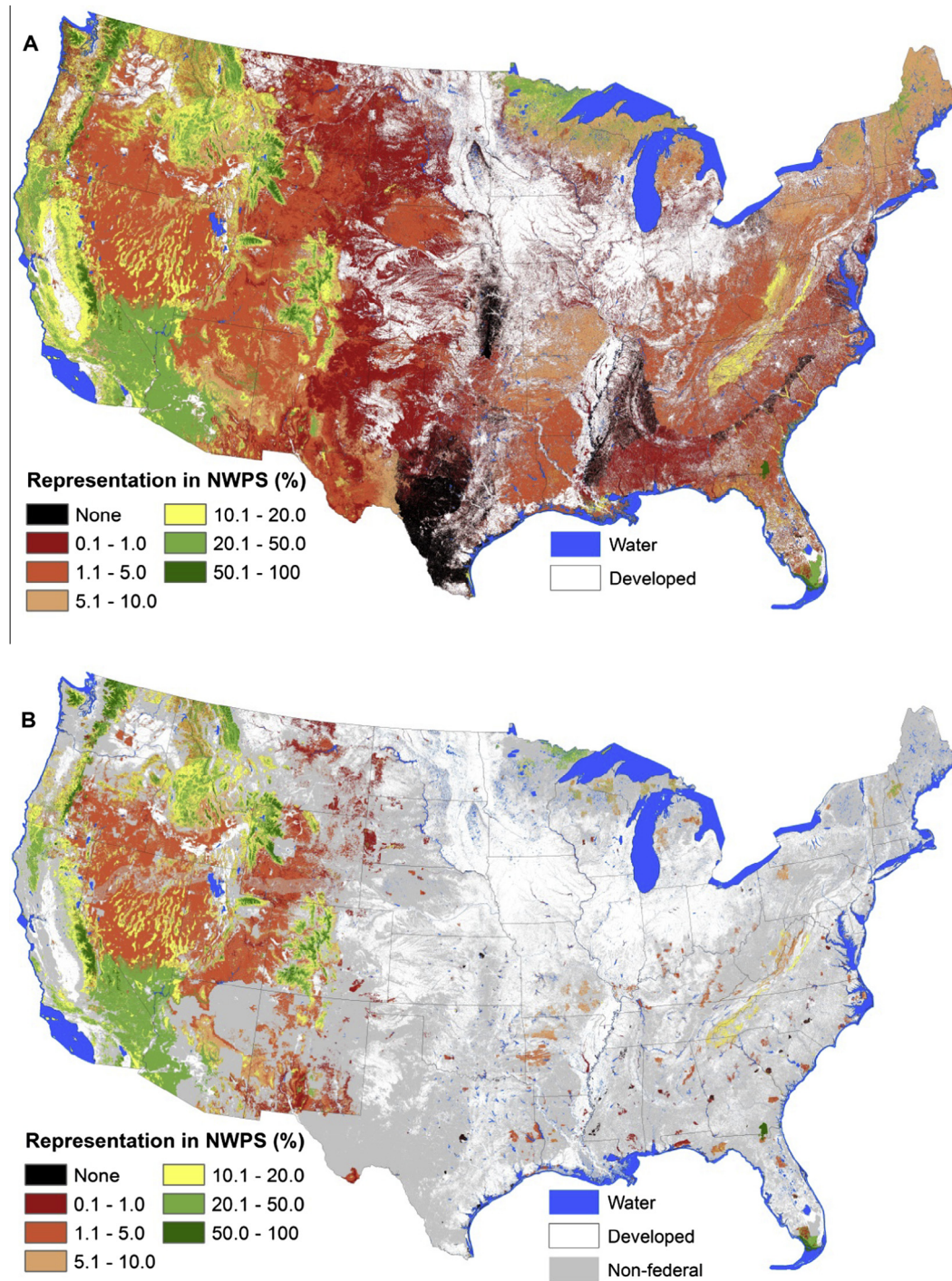


Fig. 1. The percent of federal land area in the National Wilderness Preservation System (NWPS) for each of 565 ecological systems (after removing developed land and open water) mapped across all federal and non-federal lands (A) and mapped across federal lands only (B).

land area in wilderness—to evaluate a wide range of representation thresholds. At the 5% and 20% representation thresholds, 244 and 113 ecological systems, respectively, occur in wilderness (Fig. S3). The proportion of area designated wilderness within each ecological system ranges from 0% to 100% of federal land area (Fig. 1A and B). Therefore, NWPS does not include the full richness of ecological systems available on federal land.

Total area within the U.S., on federal land, and in wilderness are characterized by a few common and widely distributed ecological systems, a pattern shown in the negative exponential distributions of rank abundance curves (Fig. 2). However, ecological systems in

wilderness are more strongly dominated by a few ecological systems (slope of exponential decay function = -0.027 , $R^2 = 0.95$) compared to ecological systems found on federal lands (slope = -0.020 , $R^2 = 0.93$) and in the U.S. (slope = -0.017 , $R^2 = 0.90$). Therefore, ecological system evenness in NWPS is lower compared to evenness of federal lands and of all U.S. lands.

Total area of NWPS has increased since 1964, albeit at a declining rate since 1995 (Fig. 3A). Half of the area currently in wilderness was accumulated by 1984, and 95% by 2006. New ecological systems represented in wilderness accumulated steeply for the first 20 years following passage of the Wilderness Act. However,

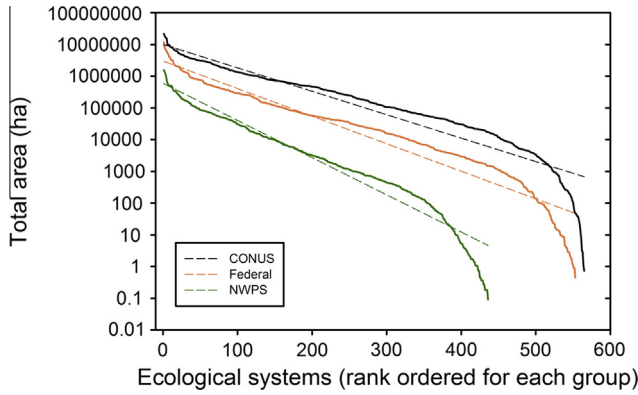


Fig. 2. Rank order abundance curves (i.e., “Whittaker” [1965] plots) of ecological system diversity within the contiguous United States (CONUS), on federal land, and within the National Wilderness Preservation System (NWPS). The slopes of the exponential decay functions (dashed lines) estimate differences in ecological system evenness. Total number of ecological systems for each group (U.S., federal, NWPS) represents total richness.

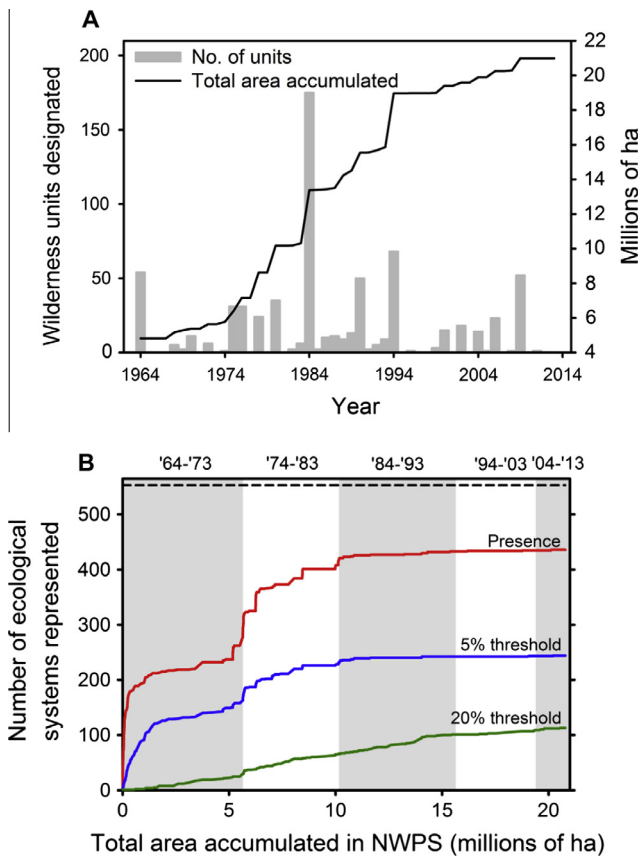


Fig. 3. Number of wilderness units and total area accumulated in the National Wilderness Preservation System (NWPS) over the 50-year tenure of the Wilderness Act (A). The number of unique ecological systems represented in NWPS as a function of total area accumulated (B). The red line indicates nominal presence of an ecological system in NWPS. The blue and green lines represent ecological systems with greater than 5% and 20%, respectively, of federal land in wilderness. The top of panel B represents the total number of ecological system in the United States, and the dashed line represents the total number of ecological systems on federal land. Decades starting with the 1964 passage of the Wilderness Act are shown as grey and white shading.

rate of accumulation of ecological systems in wilderness declined over the last 30 years. Specifically, half of the total ecological system richness currently represented in wilderness (as measured

by both presence and the 5% representation threshold) was accumulated by the first year of the Wilderness Act (1964), and 95% of ecological system richness was accumulated by 1984 (Fig. 3B). Even at the 20% representation threshold, half of the total richness was accumulated by 1978, and 95% was accumulated by 1994. Growth in accumulated area in wilderness has greatly outpaced growth in total ecological system richness. In fact, in the past 15 years 2 million hectares were added to the wilderness system, but have resulted in the addition of only 1 new ecological system.

We found no relationship between the area of an ecological system occurring on federal land and the proportion of its federal land area represented in wilderness ($p = 0.93$; Fig. 4A). In other words, rare ecological systems on federal land are as likely to be represented in wilderness as common ecological systems.

4. Discussion

Our results clearly show that the National Wilderness Preservation System under-represents the full ecological system diversity occurring on federal lands. Neither the U.S. Congress nor federal land-management agencies have explicitly addressed the representation of ecological system diversity within NWPS, nor has there been any systematic conservation planning to achieve conservation goals of ecological representation (Margules and Pressey, 2000). U.S. wilderness areas have historically been designated through a mix of political will and public desire for recreation, solitude, and scenery, albeit with a growing recognition of their value in conserving ecological integrity (Cordell et al., 2005). Although ecological representation and conservation of biological diversity are not specifically addressed in the Wilderness Act, they have become important benefits of the system, as they have for all protected areas. This situation is not unique to wilderness. Few protected areas in the U.S. were established to conserve biological diversity. For example, the National Forest System’s Organic Act, which provided the statutory basis for management of forest reserves, stated that the intention of the forest reservations is to “improve and protect the forest within the reservation, . . . securing favorable conditions of water flows, and to furnish a continuous supply of timber for the use and necessities of citizens of the United States” (Forest Service Organic Administration Act, 1897). National parks had a somewhat clearer mandate to conserve species, as the fundamental purpose of parks was “to conserve the scenery and natural and historic objects and the wild life therein and to provide for the enjoyment in the same in such manner and by such means as will leave them unimpaired for the enjoyment of future generations” (National Park Service Organic Act, 1916). Plant and animal species, however, were secondary concerns, as the Secretary of Interior was provided discretion for “the destruction of such animals and of such plant life as may be detrimental to the use of any of said parks” (National Park Service Organic Act, 1916). Perhaps more important than the original goals of protected areas is the degree of protection from stressors that they are afforded by law today. One reason why it is important to assess the ecological representation of wilderness areas in their own right is the high level of protection that occurs therein.

We do not, however, expect wilderness areas to provide for the protection of all biological diversity in the U.S. or even all the species found on federal lands. Other protected areas, in addition to wilderness, must contribute to achieving these goals. It is valuable, nevertheless, to assess the level of ecological representation in the wilderness system to understand how that representation may be increased to further protect biological diversity, for the wilderness system is unique and provides a type of protection from human stressors that other protected areas may not.

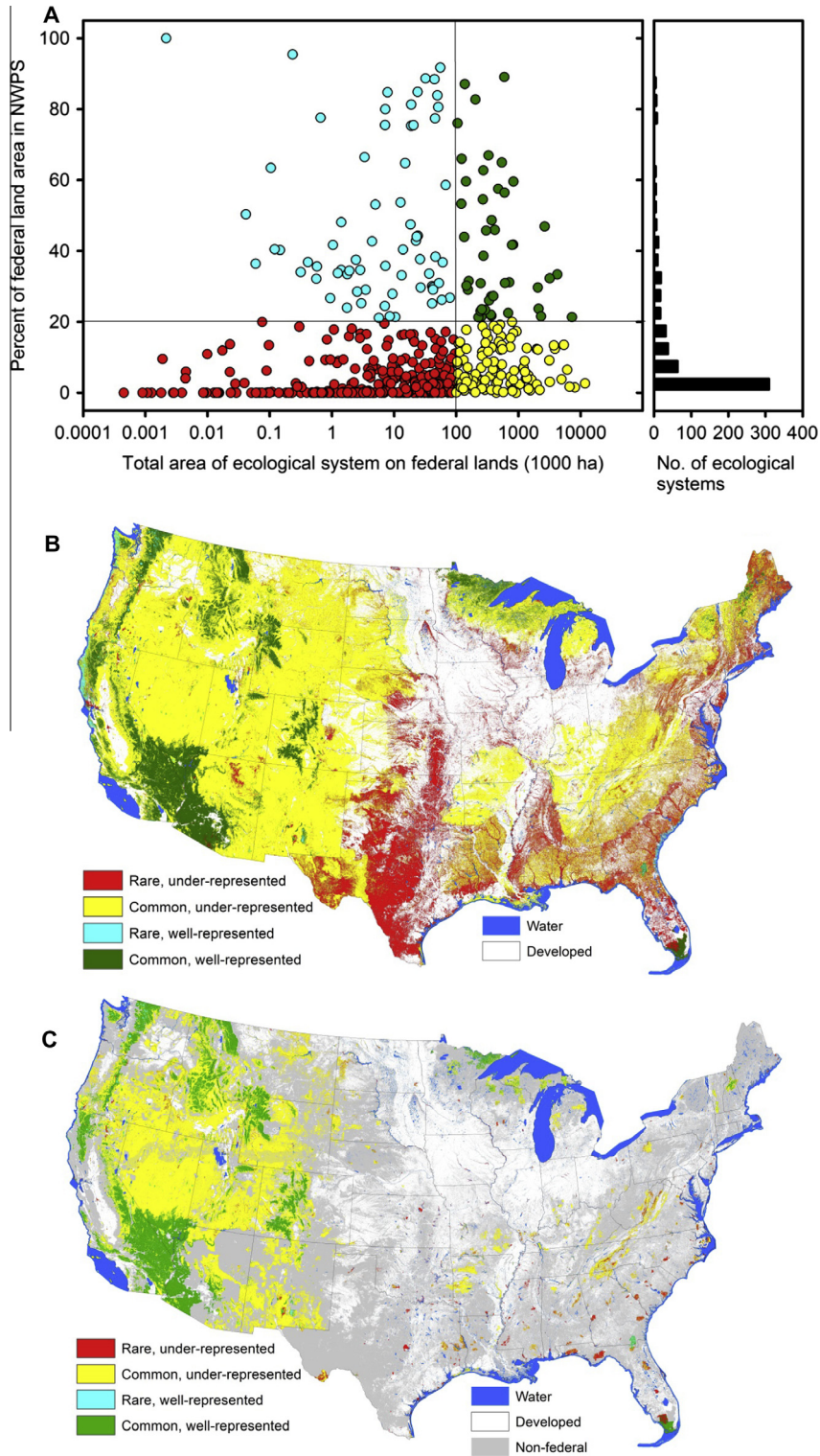


Fig. 4. The relationship between the area of ecological systems occurring on federal land and the proportion of federal land area represented in the National Wilderness Preservation System (NWPS) and our classification of ecological systems as “rare” or “common” and “well-represented” or “under-represented” (A). The histogram on the right shows the number of ecological systems in 20 bins of percent federal land area in NWPS. This classification is mapped for all non-developed, terrestrial ecological systems across all federal and non-federal lands (B) and mapped across federal lands only (C). Note: one example of a rare, well-represented ecological system is the Okefenokee Swamp on the Florida–Georgia border.

Wilderness areas are arguably the most important areas in the United States in which to achieve ecological system representation. Due to their strict rules of use and protection (Dawson and Hendee, 2009), wilderness areas have been increasingly recognized for their

importance in conserving biological diversity and fundamental physical and biological processes, including large-scale disturbance regimes (Hobbs et al., 2010). Moreover, a network of connected wilderness and other protected areas that represent the

full expression of nature's diverse ecological systems can also serve as "untreated control units" for experimental treatments on other lands where novel methods of restoration and management will be increasingly implemented to mitigate the impacts of climate change and other human-caused stressors (Magness et al., 2011).

This is the first study to assess the wilderness system at the ecological system level, including a comparison of ecological diversity to federal lands and all U.S. lands, an assessment of accumulation of representation over time, and an investigation of the relationship between rarity of ecological system and protection in wilderness.

A recent study (Aycrigg et al., 2013) evaluated representation of finer-scale ecological systems in the comprehensive "protected areas" network of the contiguous United States—including, but not limited to, wilderness areas—at the national and ecoregional scales. Protected areas throughout the world are classified by the IUCN by their primary management objectives, with categories 1a and 1b having the most natural conditions and the lowest degree of environmental modification (Dudley, 2008). Areas outside of category one, however, may be managed for multiple uses, including extraction of natural resources, concentrated recreation and tourism, facilities development, and conversion of natural habitat types to anthropogenic types. Representation of ecological system types in these areas may not provide the protection needed to be considered true biodiversity reserves. Therefore, we are expanding upon this work so that managers and conservation biologists can understand how best to increase ecological representation within the wilderness system itself. Fully representing ecological diversity in NWPS and other protected areas has not been achieved, partially because the assessment conducted here has only recently been possible with the availability of high-resolution, universal coverage of spatial data linked to a national ecological system classification (Aycrigg et al., 2013).

The opportunity to designate additional wilderness areas is substantial and real. In contrast, designation of new large-landscape national parks has slowed in recent decades and has no explicit means of growth through federal land-use planning. New national monument proclamations by the executive branch, although relatively common, do not consistently meet the management standards of strict ecological reserves. The Wilderness Act provides a means for the U.S. Congress to continually designate additional wilderness areas from federal public lands—primarily in un-roaded and sparsely-roaded areas. The diversity of ecological systems in NWPS, therefore, can increase if efforts are made to prioritize designations by ecological criteria. As shown in Fig. 4B and C, many common ecological systems remain under-represented in NWPS, providing ample opportunity to increase ecological diversity. Alpine, high montane, and boreal forest vegetation communities are well-represented in wilderness, as are low-elevation "warm" semi-desert areas with sparse vegetation (Table 1). The relatively rare wet-tropical ecological systems are also well-represented, largely due to the abundance of south Florida wilderness. Temperate forests, temperate and boreal grasslands and shrublands, and semi-desert scrub and grasslands (especially in "cool" deserts) are under-represented in wilderness, yet many millions of hectares of these subclasses are found on federal land.

Human population growth and subsequent pressure for development and extraction of natural resources will make wilderness areas increasingly vital to conserve biological diversity. If we intend to take advantage of the highly-protective nature of wilderness areas to conserve biological diversity, future recommendations for additions to the system should strongly consider how under-represented ecological systems could be prioritized in new wilderness bills. As the designation of new protected areas becomes increasingly difficult, it is important to achieve maximum ecological system diversity for every new area designated.

Table 1

Ecological subclasses of the National Vegetation Classification System (all open water and modified land combined into "other subclasses"), the proportion of federal land in the National Wilderness Preservation System (NWPS) for each subclass, the area of each subclass in wilderness, and the area of each subclass on all federal land [hectares are derived from spatial data].

National Vegetation Classification System (NVCS) Subclass	% in NWPS	Hectares in NWPS	Hectares on federal land
Cool Semi-Desert Scrub & Grassland	2.9	1,222,726	42,730,449
Tropical Dry Forest	3.8	1169	30,421
Other Subclasses (Open water, modified land, etc.)	6.5	611,951	9,397,380
Temperate & Boreal Shrubland & Grassland	10.4	1,489,897	14,346,766
Temperate Forest	14.8	10,050,644	67,817,892
Warm Semi-Desert Scrub & Grassland	16.0	3,068,431	19,211,918
Mediterranean, Temperate & Boreal Nonvascular & Sparse Vegetation	16.9	148,663	882,226
Mediterranean Scrub & Grassland	21.4	280,892	1,314,014
Boreal Forest	25.9	375,721	1,450,366
Semi-Desert Nonvascular & Sparse Vascular Vegetation	27.0	1,751,589	6,486,099
Barren	40.8	41,822	102,498
Tropical Shrubland, Grassland & Savanna	44.6	146,223	327,938
Tropical Moist Forest	45.1	123,752	274,565
Temperate & Boreal Alpine Vegetation	61.5	784,834	1,276,312
Polar & High Montane Nonvascular & Sparse Vegetation	72.9	892,641	1,224,276
All NVCS Subclasses	12.6	20,990,955	166,873,120

5. Role of the funding sources

All spatial data used are publicly available for no cost. The Wilderness Society and the United States Geological Survey Gap Analysis Program under research work order #G12AC20244 to The University of Idaho provided funding for staff time and did not influence study design, data collection, data analysis, data interpretation, writing of the report, or decisions on publication.

Acknowledgement

We thank Anne Davidson and Jeff Lonaker at University of Idaho for their help and suggestions.

Appendix A. Supplementary material

Supplementary data associated with this article can be found, in the online version, at <http://dx.doi.org/10.1016/j.biocon.2015.02.024>.

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May 17, 2018

Mr. Scott Armentrout, Forest Supervisor
Ms. Sam Staley, Forest Planner
Grand Mesa, Uncompahgre, and Gunnison National Forests (GMUG)
2250 South Main Street
Deha, CO 81416
Via Online GMUG Wilderness Comment Tool: <https://cara.ecosystem-management.org/PublicCommentinput?project=N P-1 81 0>

RE: Ouray County, Colorado, Comments on DRAFT: Evaluation of Wilderness Characteristics for Lands that may or may not be Suitable for Inclusion in the National Wilderness Preservation System #NP-181 0

Dear Mr. Armentrout, Ms. Staley, and GMUG Planning Team:

The Town of Mountain Village appreciates the opportunity to comment on the GMUG's Draft Evaluation of Wilderness Characteristics for Lands that may or may not be Suitable for Inclusion in the National Wilderness Preservation System. The Town of Ophir supports the recommendations submitted by Sheep Mountain Alliance and The Wilderness Society et. al. dated March 6th, 2018. In addition, we support the wilderness and special management recommendations submitted by Sheep Mountain Alliance and the Wilderness Society et. al. in November 2017. We believe that there is a need and an opportunity in the GMUG planning process to create and manage additional wilderness areas and other types of conservation designations.

The recommendations and proposed designations referenced are important because they protect a variety of values important to our community. Amongst others, these include ecosystem services that help maintain our air and water quality; habitat protection for the wildlife whom we share this landscape with; scenic values that are important for our livelihoods and tourism-based economy; recreational use; educational opportunities; and health and economic benefits. The areas under consideration possess high wilderness characteristics, high apparent naturalness, and high degrees of opportunities for solitude and primitive recreation.

They have been mapped through extensive community involvement and on-the-ground field work and they are based on the best available science and the requirements of the 2012 Forest Service Planning Rule. These landscape level recommendations will help us to enjoy a functional and wild National Forest long into the future, while respecting current and historic uses to mitigate user conflicts and strengthen the local economy.

We particularly ask that the GMUG staff consider lands that are included in an existing citizen-initiated proposal, such as the proposed San Juan Wilderness proposal. If lands are being contemplated for Wilderness designation they should be fully included in the GMUG Wilderness Inventory, as they have been extensively studied and vetted for more than a decade.

Finally, we ask that you consider the inventoried areas that retain an intact ecological system capable of natural restoration after timber, mining, or other human activity, rather than eliminating them outright from the inventory. Many of these places, when left alone, reach a state where the past activity is no longer “significantly noticeable” on the ground.

We thank you and the USFS leadership that created this Forest Planning process that allows for increased public participation and collaboration. We look forward to working with you on the next steps of the GMUG Forest Plan Revision.

Sincerely,

Laila Benitez, Mayor
Town of Mountain Village

Honorable Michael Bennet
261 Russell Senate Office Building
Washington, DC 20510
c/o John Whitney john_whitney@bennet.senate.gov

May 17, 2018

Dear Senator Bennet:

The Town of Mountain Village would like to express its continued support for the San Juan Mountains Wilderness Bill. We commend you for introducing the bill, and ask that you endeavor to move it forward into law.

Mountain Village has long been a supporter of this bill, which we see as critical to securing our economic future and way of life. While we believe that the full extent of the areas outlined in the previous version of the bill represents lands worthy of protection, we accept and support the bill in its current form.

We have reluctantly accepted some of these changes, such as the boundary revision to accommodate potential mining activity in upper Mill Creek Basin, while applauding others, such as the creation of a mountain bike trail use zone in the Ophir Valley.

This zone represents an innovative solution to user-created trails in a proposed protected area. It was formulated with great foresight and we believe that if managed properly, it will reduce user conflict while maintaining existing use.

Thank you for your tireless efforts on behalf of our communities to protect this unique place. Please let us know if there is any way in which we may better facilitate the passage of the San Juan Bill into law.

Sincerely,

Laila Benitez, Mayor
Town of Mountain Village

May 17, 2018

Dear Senator Gardner/Congressman Tipton

The Town of Mountain Village would like to express its firm support for the San Juan Mountains Wilderness Bill.

Mountain Village has long been a supporter of this bill, which we see as critical to securing our economic future and way of life. While we believe that the full extent of the areas outlined in the previous version of the bill represents lands worthy of protection, we accept and support the bill in its current form.

We hope that our Members of Congress realize the reluctance with which we have accepted some of these changes, such as the boundary revision to accommodate potential mining activity in upper Mill Creek Basin, while being key collaborators on others, such as the creation of a mountain bike trail use zone in the Ophir Valley.

This zone represents an innovative solution to user-created trails in a proposed protected area. It was formulated with great foresight and we believe that if managed properly, it will reduce user conflict while maintaining existing use.

The San Juan Mountains Wilderness Bill is long overdue. This iconic landscape in our back yard needs to be protected once and for all. We ask you to work towards this goal alongside your colleagues in the Colorado Congressional Delegation.

Please let us know if there is any way in which we may better facilitate the passage of the San Juan Bill into law.

Sincerely,

Laila Benitez, Mayor
Town of Mountain Village

Agenda item 15

Memo

To: Mayor and Council Members

From: James Mahoney

Date: June 6, 2018

Re: Public Comment Policy

As you know we discussed public comment issues and best practices at the May Town Council meetings where you gave me general direction to bring back an official policy document.

Attached is the draft resolution and policy. If I have missed the mark or there are suggested changes please let me know and we can address changes at the Town Council meeting on the 14th.

RESOLUTION OF THE TOWN COUNCIL OF THE TOWN OF MOUNTAIN VILLAGE, COLORADO, ADOPTING A PUBLIC COMMENT POLICY

RESOLUTION NO. 2018 - _____

RECITALS:

- A.** The Town Council of the Town of Mountain Village, Colorado hereby recognizes the need for accepting and hearing public comment in order to fully understand issues and hear from its constituents.

- B.** The Town Council also recognizes the important governmental interest in running good, efficient meetings and enabling its constituents to each be fairly heard regardless of the content of their public comment so long as it is made in a civil manner. Therefore, the Town Council recognizes the need to adopt an implement a public comment policy as set forth below.

NOW, THEREFORE, BE IT RESOLVED, the Town Council of the Town of Mountain Village hereby adopts the attached Public Comment Policy and repeals and replaces the any previous resolutions or documents addressing public comment adopted by the Town.

ADOPTED AND APPROVED by the Town Council of the Town of Mountain Village, Colorado, at a regular meeting held on the ___ day of June, 2018.

TOWN OF MOUNTAIN VILLAGE,
COLORADO, a home rule municipality

By: _____
Laila Benitez, Mayor

ATTEST:

By: _____
Jackie Kennefick, Town Clerk

APPROVED AS TO FORM:

By: _____
James Mahoney, Town Attorney

PUBLIC COMMENT POLICY

The following shall be the policy of the Town of Mountain Village regarding the giving and receipt of public comment at all Town Council, Design Review Board and other Public Meetings of the Town of Mountain Village:

- I. **Written Comment:** For all Public Meetings, the Town encourages the submission of written public comments, including letters, memos, presentations, emails, photographs, power point presentations and all other similar written materials for each agenda item (“Written Comment”).
 - a. In order to have Written Comment included in the record of any public meeting, such Written Comment must be submitted at least 48 hours prior to the start of the agenda item. Written Comment may be received after the 48 hour deadline but shall not be deemed as part of the record of such Public Meeting or public hearing.
 - b. Unless a speaker is an agenda item speaker with Written Comment that the agenda item speaker desires to display, Written Comment shall not be displayed through the Town’s network or displays for cyber and IT security concerns.
- II. **Public Comment:** For all Public Meetings and each agenda items, other than executive sessions, breaks and staff reports, it is the Policy of the Town of Mountain Village to accept public comment subject to the following:
 - a. All those who wish to provide public comment must sign in on the sign in sheet at the entrance to the Public Meeting and shall indicate which item(s) they intend to give public comment on prior to the opening of public comment for such agenda item.
 - b. Speakers shall wait to be recognized by the Mayor to speak and shall give public comment at the public comment microphone when recognized by the Mayor.
 - c. Speakers shall state their full name for the record and affiliation with the Mountain Village if any.
 - d. Speakers shall be limited to five minutes with no aggregating of time through the representation of additional people. Failure to adhere to the five minute time limit will result in the Mayor requesting the speaker to stop speaking. If a speaker refuses to stop speaking the Mayor shall call for a recess and the Council or Board Members shall leave the room and return to the meeting in fifteen minutes. If a speaker refuses to stop after that point in time, the Town may proceed pursuant to C.R.S. 18-9-108 and remove such person from the Public Meeting.
 - e. Speakers shall refrain from personal attacks and shall keep comments to that of a civil tone.



COLORADO FLIGHTS
ALLIANCE



2,000,000
SEATS
TEX & MTJ

600,000
INBOUND GUESTS

1,450,000
PASSENGER TRIPS

Approximately
\$975
MILLION
in Direct
GUEST SPENDING

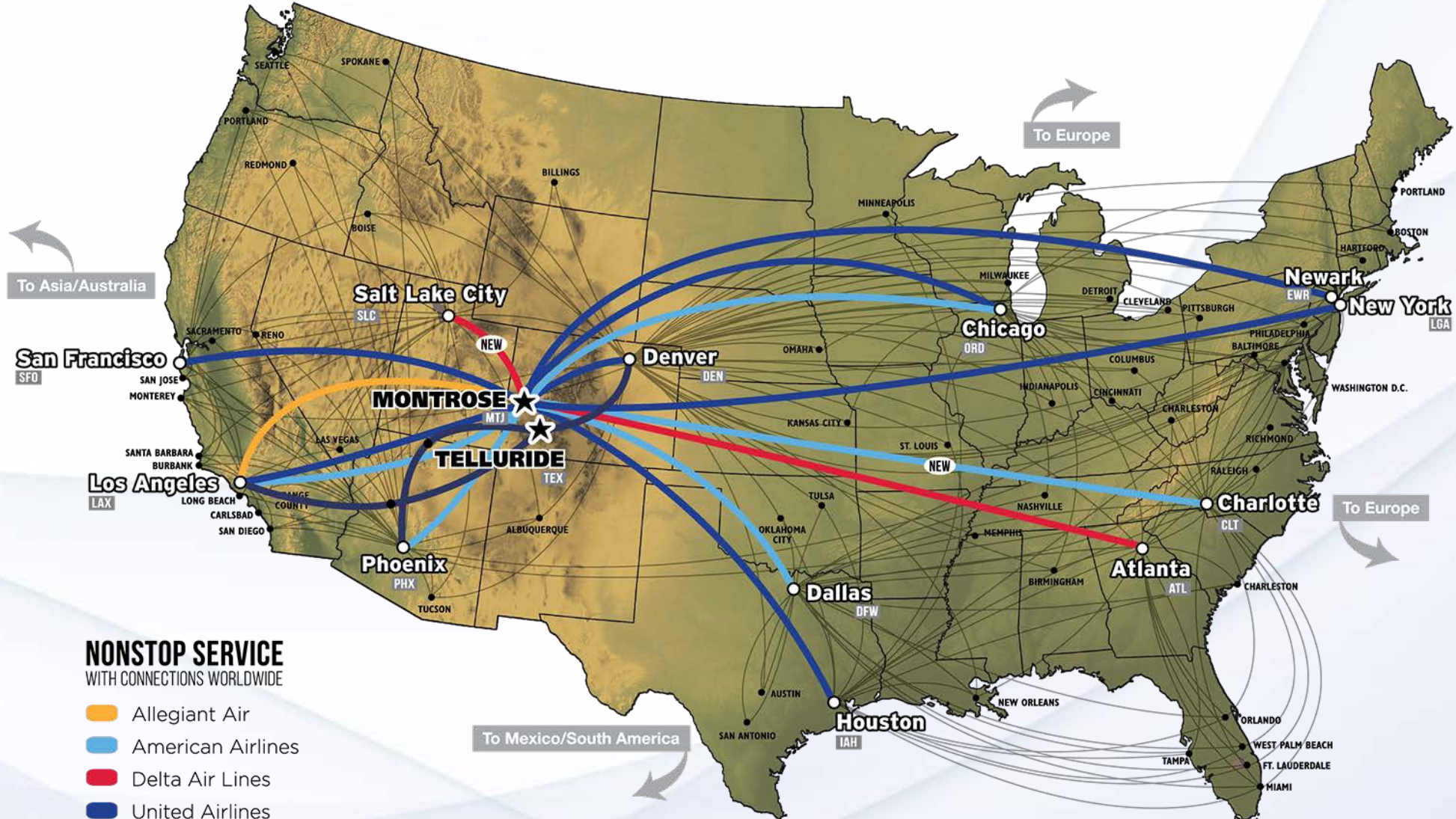
\$3 BILLION
IN ECONOMIC BENEFIT

Mission:

The Colorado Flights Alliance creates economic vitality for Colorado's western slope through air service development.



- Hanging Tough This Winter
- Summer Schedule & Growth
- Marketing & PR
- Winter 2018-19 Targets
- Statewide

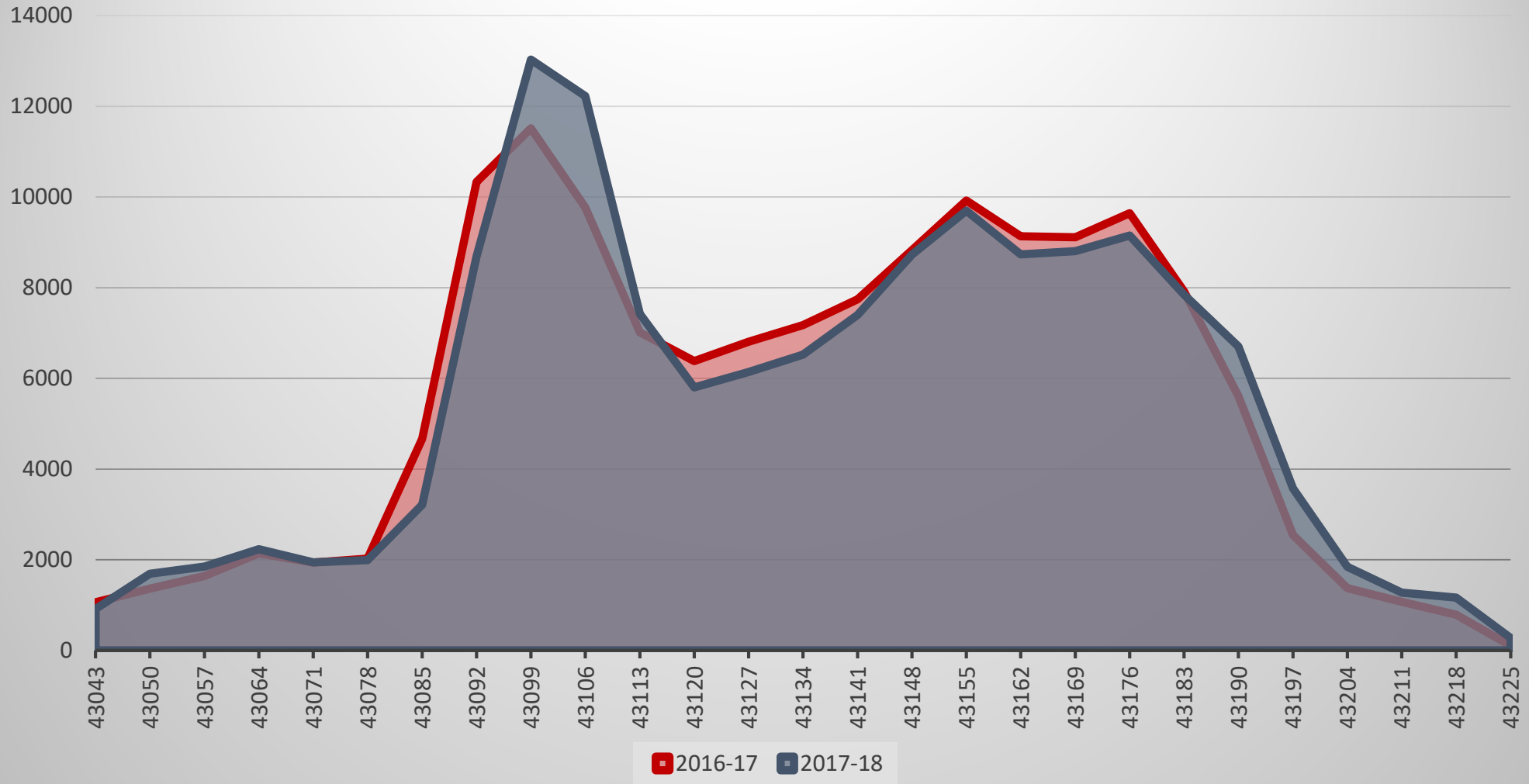


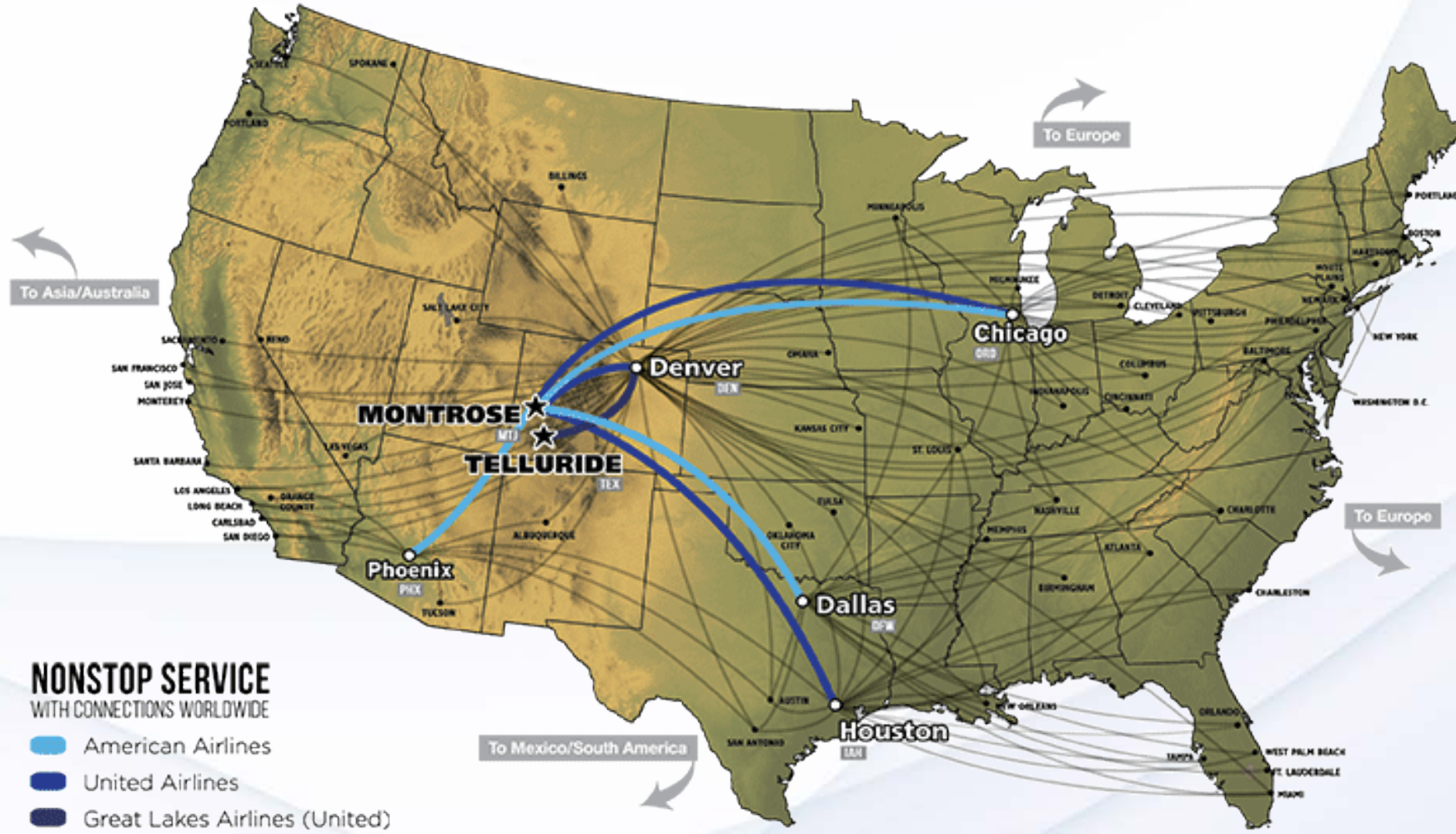
NONSTOP SERVICE
WITH CONNECTIONS WORLDWIDE

- Allegiant Air
- American Airlines
- Delta Air Lines
- United Airlines
- Great Lakes Airlines (United)



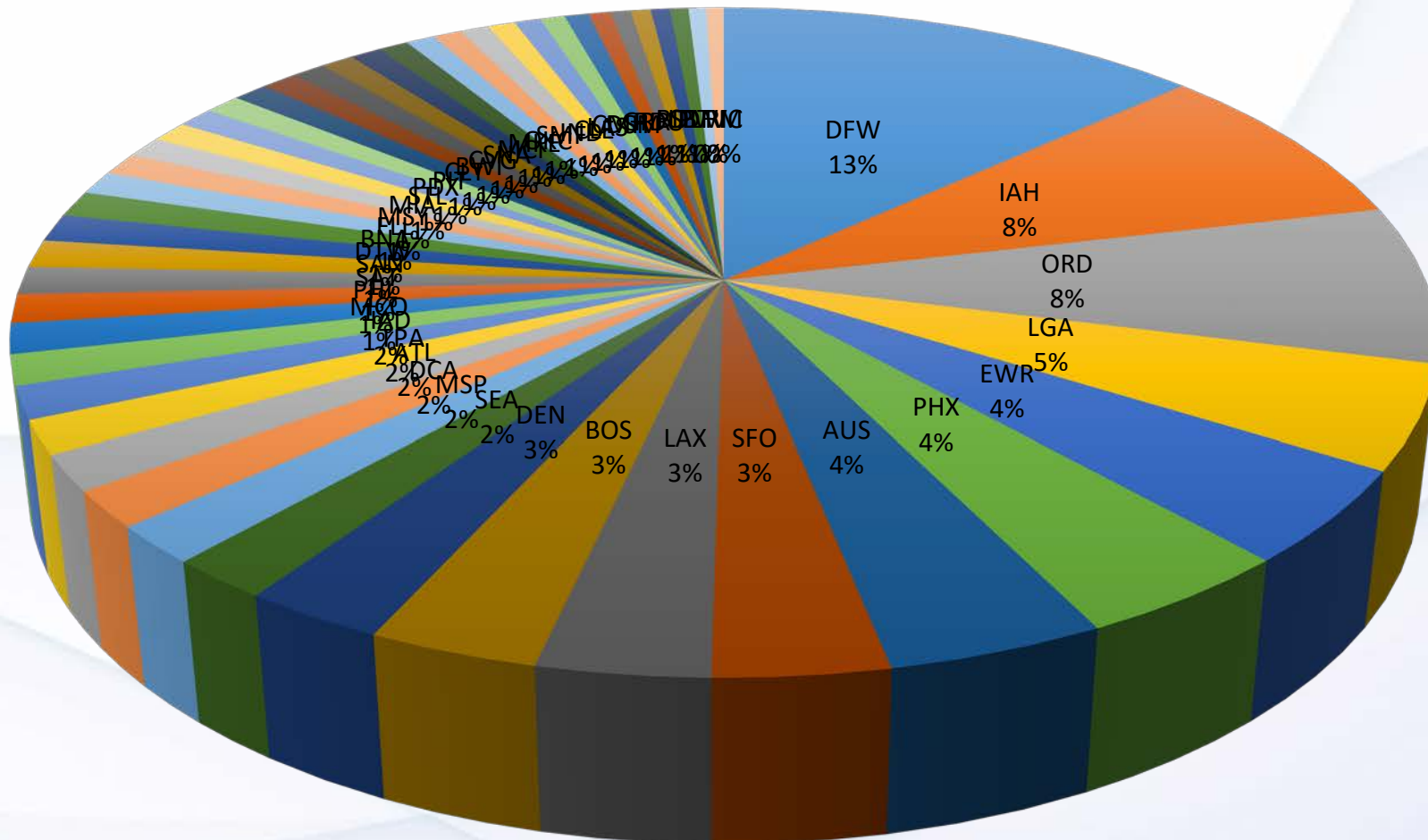
Winter Passenger Snapshot

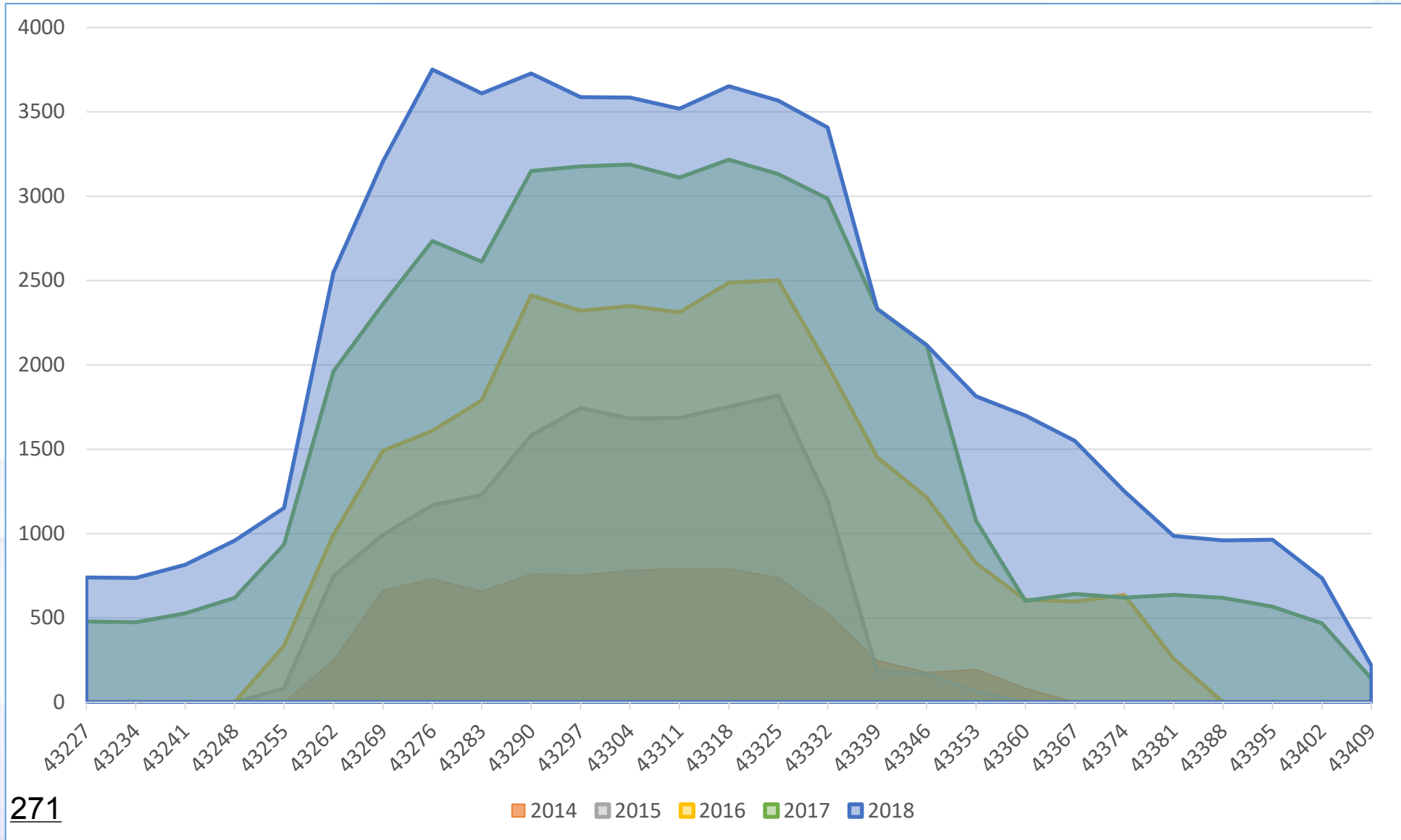






Top Summer Markets





29%
Seats YOY

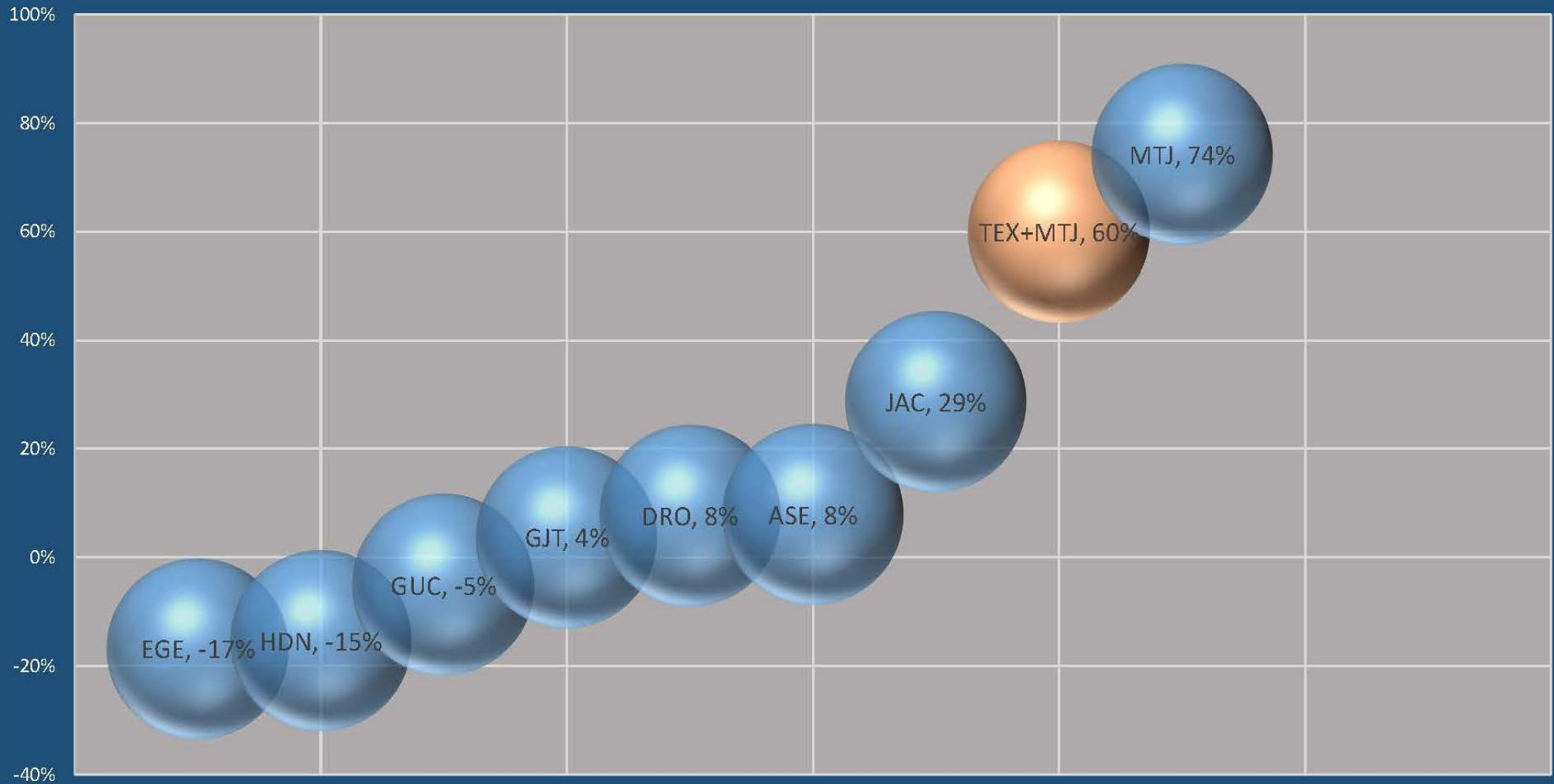
6.5x
PAX 5YR

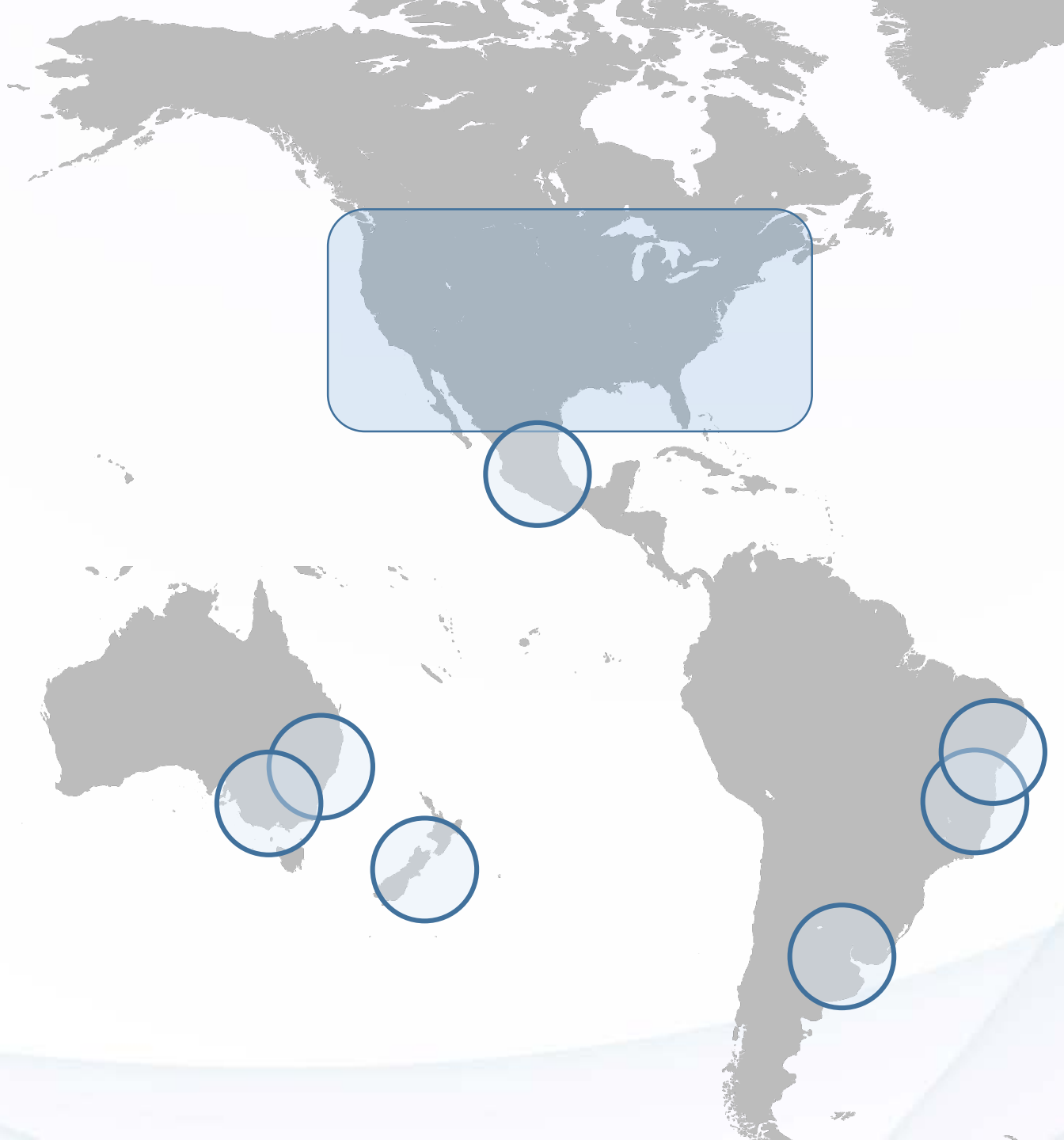
6.6x
Seats 5YR

CFA



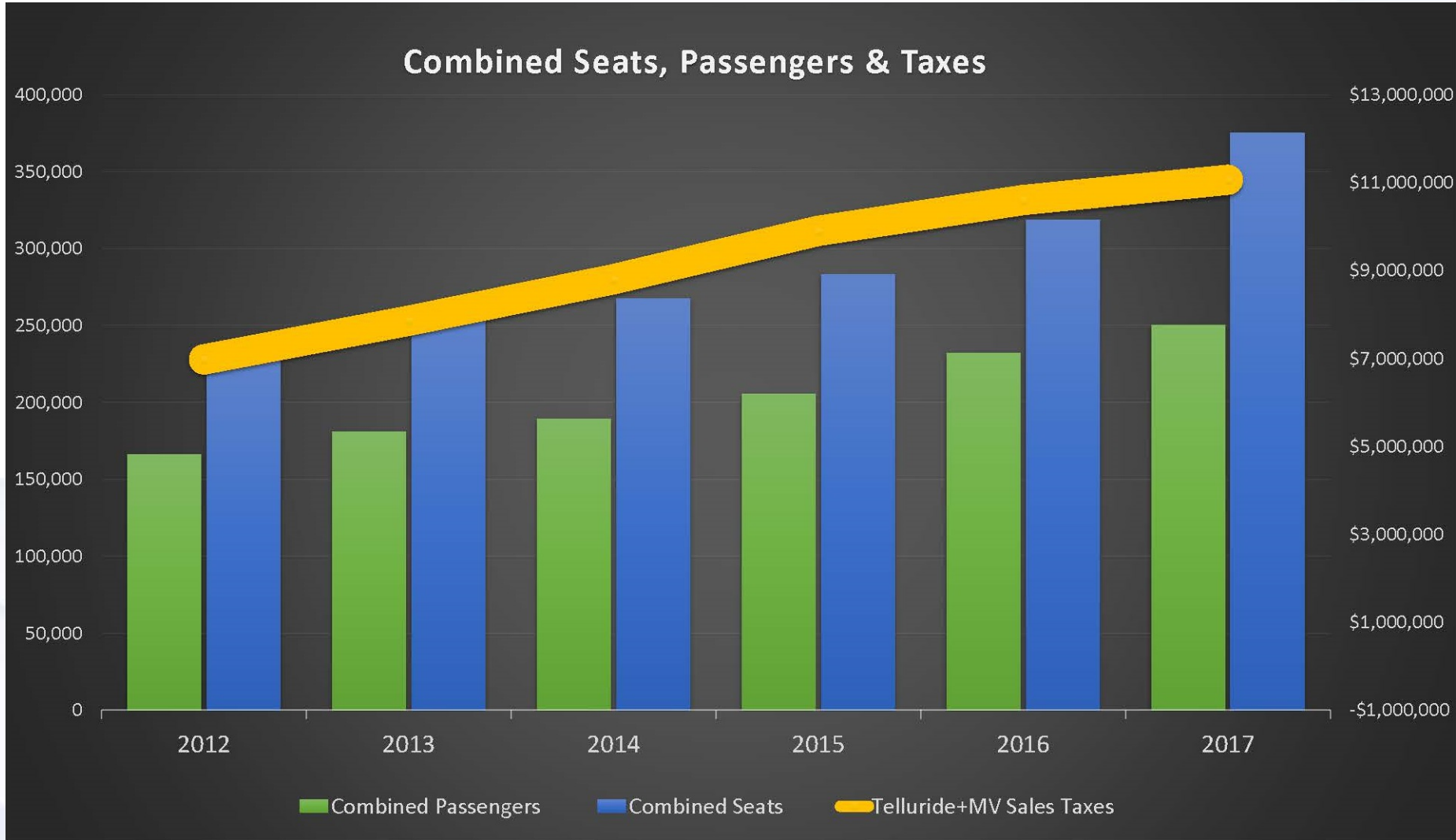
5YR Comp Set Seat Growth







Combined Seats, Passengers & Taxes



8%
PAX

18%
Seats

4%
Comb Tax

51%
PAX

60%
Seats

59%
Comb Tax

YOY
274

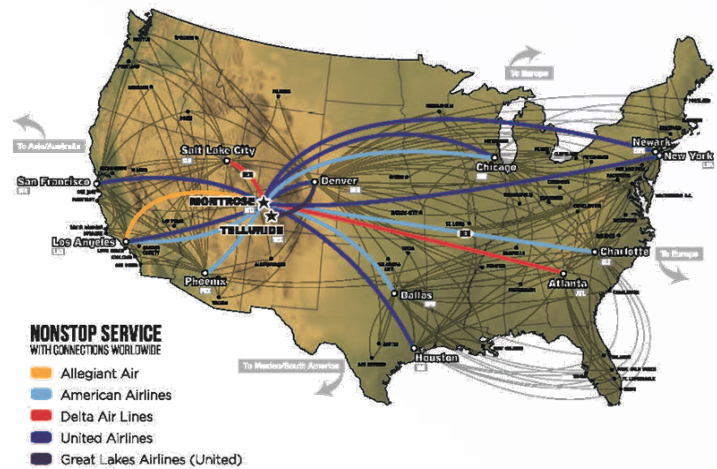
5YR



TELLURIDE/MONTROSE
(MTJ & TEX)
2017-2018
WINTER FLIGHT PLAN



DEVELOPMENT TARGETS



CITY - CARRIER	AIRPORT	FREQUENCY	DATES
DENVER			
United	DEN MTJ	4-6x Daily	Year-Round
Great Lakes/United	DEN TEX	1-2x Daily (except Tuesday)	Year-Round
DALLAS			
American	DFW MTJ	1-3x Daily	Year-Round
PHOENIX			
American	PHX MTJ	Daily	Dec 15 - Apr 2
HOUSTON			
United	IAH MTJ	Daily	Dec 20 - Apr 2
CHICAGO			
United	ORD MTJ	Daily	Dec 20 - Apr 2
American	ORD MTJ	Daily	Dec 15 - Jan 7
American	ORD MTJ	Saturday	Feb 17 - Mar 31
NEW YORK			
United	EWR MTJ	Saturday & Sunday	Dec 23 - Apr 1
United	LGA MTJ	Saturday	Dec 23 - Mar 31
LOS ANGELES			
United	LAX MTJ	Saturday & Sunday	Dec 23 - Apr 1
Allegiant	LAX MTJ	Wednesday & Saturday	Dec 20 - Mar 31
American	LAX MTJ	Daily	Dec 15 - Jan 7
American	LAX MTJ	Saturday	Feb 17 - Mar 31
SAN FRANCISCO			
United	SFO MTJ	Weds, Sat & Sun	Dec 23 - Apr 1
ATLANTA			
Delta	ATL MTJ	Daily	Dec 21 - Jan 7
Delta	ATL MTJ	Saturday	Jan 13 - Mar 31
Delta	ATL MTJ	Weds & Sat (2nd Overnight)	Feb 21 - Apr 1
CHARLOTTE			
American	CLT MTJ	Saturday	Dec 16 - Mar 31
SALT LAKE CITY			
Delta	SLC MTJ	Holiday Daily	Dec 21 - Jan 7



COLORADO FLIGHTS
ALLIANCE



**PLANNING, HOUSING AND DEVELOPMENT SERVICES
DEPARTMENT**

455 Mountain Village Blvd.
Mountain Village, CO 81435
(970) 369-8250

Agenda Item No. 17

TO: Town Council

FROM: Cecilia Curry, VCA Property Manager & Michelle Haynes, Planning and Development Services Director

FOR: Meeting of June 14, 2018

DATE: June 4, 2018

RE: **Discussion Regarding Village Court Apartment rental rate increases**

INTRODUCTION

The current Village Court Apartments (VCA) rents set forth in Attachment #1, Rental Rates and Fee Rates, were approved by the Mountain Village Housing Authority in 2013 and went into effect in 2014 as leases were renewed. Staff requests Town Council discuss a VCA rental rate increase by less than \$50 a unit in 2019 and effective upon lease renewal.

BACKGROUND

VCA rental rates have fallen behind the areas affordable housing rates. A comparison of other affordable rental rates was done in May 2018 and the results are shown in Attachment #2, Apartment Area Comparison. Shandoka Apartments indicated that they plan to raise rents 1 to 2% annually. As stated above VCA rents have not increased since 2014.

The Federal Community Development Block Grant and State Housing Development Grant of \$1,380,000 that was awarded to VCA and required a deed restriction that sets rental rates for 40 units at 50% of the Area Median Income (AMI) and for 48 unit at 60% of the AMI. AMI is used as the foundation to determine affordable rental rates because the maximum rental rate is based on 30% of a person's monthly income. Attachment #4, the 2018 Colorado Home Rent Limits are used by DOLA which sets the limit for the 88 units. There are no rent limitation restrictions on the remaining 132 units; however, the Housing Authority and The Town of Mountain Village has intentionally kept rents below fair market value as a policy. The Colorado Housing and Finance Authority (CHFA) also provides an Area Median Income and Rent Table that is attached (Attachment #3). On both tables, VCA rents are below 40% on the studios, and below 60% on 1, 2, and 3 bedrooms. These rental rates are low and are not competitive with comparative deed restricted rental units in the region. We believe this is a contributing factor to the long wait list at VCA. Pursuing the most affordable housing is a priority for many community members. If a rental rate is lower in VCA versus Shandoka, we'll have more community members desiring housing at VCA.

ATTACHMENTS

- 1) Rental Rates and Fee Rates
- 2) Apartment Area Comparison
- 3) Colorado Housing and Finance Authority 2018 San Miquel County Income and Rent Table
- 4) 2018 Colorado DOLA HOME Rent Limits

HISTORY

VCA rents were last changed in 2014 to the current rates.

DISCUSSION

It is staff's experience that rental rates are reviewed annually and rental rates are adjusted as lease renewals are done the following year. It is the apartment industry standard for affordable housing to raise rents not more than \$50 a year as it affects the working class and those tenants who have vouchers cannot have rent raised higher than \$50 a year and maintain their voucher.

It is important to note that VCA pays for utilities in the studios and 2-bedroom units and that amount is taken out of the rent; while, the 1 and 3-bedroom units pays 100% of the electricity. In all units, cable, water, sewer, and trash/recycling are provided.

Increasing rents incrementally also helps offset the maintenance and capital costs of managing a 220 unit rental property.

With this information in mind, the staff would recommend that the Housing Authority consider the rental rates increase of \$40 as outlined below:

Unit Size	Current Rent	Proposed 2019 Rent
Studio	\$680	\$720
1 Bedroom	\$845	\$885
2 Bedroom	\$1,040	\$1,080
3 Bedroom	\$1,215	\$1,255

The proposed 2019 rent will bring VCA rents within range of other area affordable housing with the 2 and 3-bedroom units still the cheapest in the area. The proposed 2019 rent will still stay in same category with the 2018 Colorado DOLA HOME Rent Limits with studios below 40% and 1, 2, and 3 bedrooms below 60%.

ANALYSIS AND RECOMMENDED DIRECTION

Staff recommends the Town Council approve a resolution adopting the Village Court Apartments rent and fee schedule at their July 19, 2019 regular meeting to increase rents by at least \$40 for the 2019 year to be increased at lease renewal.




TOWN OF MOUNTAIN VILLAGE HOUSING AUTHORITY
VILLAGE COURT APARTMENTS
 415 Mountain Village Blvd. Suite 1
 Mountain Village, CO 81435
 970-728-9117 Pho
 970-728-1318 Fax

RENTAL RATES AND FEE RATES

Unit Type	Lease Term	Rent	Security Deposit (1.5 x Monthly Rent)
Studios	One Year	\$680	\$845
One Bedrooms	One Year	\$845	\$1,170
Two Bedrooms	One Year	\$1,040	\$1,305
Three Bedrooms	One Year	\$1,215	\$1,715
<ul style="list-style-type: none"> All units require a one year lease and require a minimum occupancy of one person per bedroom to maximize housing within Mountain Village. Rent includes water, sewer, trash, recycling, Mountain Village Cable, and electricity for studios and two bedroom units. One and three bedroom units have separate electric meters with electricity service paid by tenant through SMPA (San Miguel Power Association) tenant account. 			

2016 INCOME LIMITS AREA MEDIAN INCOME (AMI)

 <small>EQUAL HOUSING OPPORTUNITY</small>	<p>It's our policy to provide apartment homes to our customers without regard to race, creed, color, sex, religion, national ancestry, marital status, familial status or handicap.</p>
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Per a DOLA use covenant recorded at Reception Number #425670, tenant income for "Studio and One bedroom" units are restricted as follows:

- **40 VCA UNITS have a maximum income of less than or equal to 50% of AMI.**
- **48 VCA UNITS have a maximum income of less than or equal to 60% of AMI.**
- 7 HOME VCA UNITS, 6 Units less than or equal to 60% AMI and 1 Unit less than or equal to 50% AMI, this only applies to buildings 10, 11 & 12.

Fees and Fines

Application Fee (credit and Background check)	\$50 per Application, all residents over 18 must apply
TMVHA Fee (Administrative fee)	\$50(applicant) & \$10 for each additional income earning occupant
Credit Card and Debit Card Payment Convenience Fee	\$12 per transaction
Disposal of couch, mattress or other large items	\$100 for each item
Pet Violation: Not immediately picked up and disposed dog feces Not being on a leash	1 st Occurrence: \$25.00 2 nd Occurrence: \$50.00 3 rd Occurrence: Owner removal of pet from property
Pet Deposits and fees	Dog and/or Cat: \$400 (refundable) \$30 monthly pet fee Clean-up Waste: \$50.00
Wheel Lock Removal (booted)	\$100
Towing Fine	At vehicle owners expense
Lock-Out	8 a.m. to 5 p.m.: \$20.00 5 p.m. to 8 a.m.: \$50.00
Key Replacement (Lock must be rekeyed)	\$50.00
Trash Violation (leaving trash outside unit or trash house)	\$25.00
Recycling Violation (placing trash in recycling containers)	\$25.00

Revised 11/2016



VILLAGE COURT APARTMENTS

APARTMENT AREA COMPARISON

APARTMENT	NUMBER OF UNITS	SQ. FT.	UTILITIES	CURRENT RENT AMOUNT	VCA Rent with \$40 Increase
STUDIOS					
Village Court	78	351	Included	\$680	\$720
Big Billies	138	242	Included	\$688	
Big Billies	9	363	Included	\$788	
Virginia Placer	6	407	Not include electric	\$850	
Tiny Homes	3	290	Not include electric	\$700	
1 BEDROOM					
Village Court	78	525	Not include electric	\$845	\$885
Mountain View	5	628	Included	\$700	
Shandoka	30	476	Not include electric	\$838	
Shandoka	12	532	Not include electric	\$872	
2 BEDROOM					
Village Court	52	785	Included	\$1,040	\$1,080
Mountain View	25	760	Included	\$1,100	
Virginia Placer	3	711	Not include electric	\$1,400	
Virginia Placer	9	837	Not include electric	\$1,430	
Shandoka	35	704	Not include electric	\$1,115	
Shandoka	4	770	Not include electric	\$1,283	
Shandoka	5	728	Not include electric	\$1,283	
Shandoka	10	778	Not include electric	\$1,150	
Shandoka	8	784	Not include electric	\$1,150	
3 BEDROOM					
Village Court	12	1,075	Not include electric	\$1,215	\$1,255
Shandoka	7	943	Not include electric	\$1,435	
Shandoka	5	1,025	Not include electric	\$1,541	
Shandoka	11	1,018	Not include electric	\$1,466	
Shandoka	6	1,008	Not include electric	\$1,466	



Colorado Housing and Finance Authority
2018 Colorado County Income and Rent Tables
 30% to 120% of Area Median Income (AMI)

HUD Effective Date: April 1, 2018

-Since 2008, the IRS allows some LIHTC projects to use higher HERA limits and to be "held harmless" from limit decreases.
 -To identify the correct limits for your LIHTC project, it is essential to know its placed in service (PIS) date.
 -To use HERA limits, a LIHTC project must have PIS as of 12.31.2008.
 -To be "held harmless," a LIHTC project must PIS prior to 05.14.2018. This year, LIHTC projects whose counties experienced a decrease in limits AND that PIS before 05.14.2018 may continue to apply the same limits used in 2017.

County	2018 MAXIMUM RENTS							2018 INCOME LIMITS							
	HERA	AMI	0 BDRM	1 BDRM	2 BDRM	3 BDRM	4 BDRM	1 PERSON	2 PERSON	3 PERSON	4 PERSON	5 PERSON	6 PERSON	7 PERSON	8 PERSON
San Juan	Y	60%	801	858	1,029	1,188	1,326	32,040	36,600	41,160	45,720	49,380	53,040	56,700	60,360
San Juan	Y	55%	734	786	943	1,089	1,215	29,370	33,550	37,730	41,910	45,265	48,620	51,975	55,330
San Juan	Y	50%	667	715	857	990	1,105	26,700	30,500	34,300	38,100	41,150	44,200	47,250	50,300
San Juan	Y	45%	600	643	771	891	994	24,030	27,450	30,870	34,290	37,035	39,780	42,525	45,270
San Juan	Y	40%	534	572	686	792	884	21,360	24,400	27,440	30,480	32,920	35,360	37,800	40,240
San Juan	Y	30%	400	429	514	594	663	16,020	18,300	20,580	22,860	24,690	26,520	28,350	30,180
San Juan		120%	1,494	1,600	1,920	2,218	2,475	59,760	68,280	76,800	85,320	92,160	99,000	105,840	112,680
San Juan		100%	1,245	1,333	1,600	1,848	2,062	49,800	56,900	64,000	71,100	76,800	82,500	88,200	93,900
San Juan		80%	996	1,067	1,280	1,479	1,650	39,840	45,520	51,200	56,880	61,440	66,000	70,560	75,120
San Juan		65%	809	866	1,040	1,201	1,340	32,370	36,985	41,600	46,215	49,920	53,625	57,330	61,035
San Juan		60%	747	800	960	1,109	1,237	29,880	34,140	38,400	42,660	46,080	49,500	52,920	56,340
San Juan		55%	684	733	880	1,016	1,134	27,390	31,295	35,200	39,105	42,240	45,375	48,510	51,645
San Juan		50%	622	666	800	924	1,031	24,900	28,450	32,000	35,550	38,400	41,250	44,100	46,950
San Juan		45%	560	600	720	831	928	22,410	25,605	28,800	31,995	34,560	37,125	39,690	42,255
San Juan		40%	498	533	640	739	825	19,920	22,760	25,600	28,440	30,720	33,000	35,280	37,560
San Juan		30%	373	400	480	554	618	14,940	17,070	19,200	21,330	23,040	24,750	26,460	28,170
San Miguel		120%	1,785	1,912	2,295	2,649	2,955	71,400	81,600	91,800	101,880	110,040	118,200	126,360	134,520
San Miguel		100%	1,487	1,593	1,912	2,207	2,462	59,500	68,000	76,500	84,900	91,700	98,500	105,300	112,100
San Miguel		80%	1,190	1,275	1,530	1,766	1,970	47,600	54,400	61,200	67,920	73,360	78,800	84,240	89,680
San Miguel		65%	966	1,035	1,243	1,434	1,600	38,675	44,200	49,725	55,185	59,605	64,025	68,445	72,865
San Miguel		60%	892	956	1,147	1,324	1,477	35,700	40,800	45,900	50,940	55,020	59,100	63,180	67,260
San Miguel		55%	818	876	1,051	1,214	1,354	32,725	37,400	42,075	46,695	50,435	54,175	57,915	61,655
San Miguel		50%	743	796	956	1,103	1,231	29,750	34,000	38,250	42,450	45,850	49,250	52,650	56,050
San Miguel		45%	669	717	860	993	1,108	26,775	30,600	34,425	38,205	41,265	44,325	47,385	50,445
San Miguel		40%	595	637	765	883	985	23,800	27,200	30,600	33,960	36,680	39,400	42,120	44,840
San Miguel		30%	446	478	573	662	738	17,850	20,400	22,950	25,470	27,510	29,550	31,590	33,630

2018 Colorado HOME Rent Limits
Effective June 1, 2018

SAN JUAN	30%	40%	50%	60%	65%
0 BR	\$ 373	\$ 498	\$ 622	\$ 747	\$ 789
1 BR	\$ 400	\$ 533	\$ 666	\$ 800	\$ 847
2 BR	\$ 480	\$ 640	\$ 800	\$ 960	\$ 1,018
3 BR	\$ 554	\$ 739	\$ 924	\$ 1,109	\$ 1,167
4 BR	\$ 618	\$ 825	\$ 1,031	\$ 1,237	\$ 1,283

SAN MIGUEL	30%	40%	50%	60%	65%
0 BR	\$ 446	\$ 743	\$ 892	\$ 966	\$ 929
1 BR	\$ 478	\$ 637	\$ 796	\$ 956	\$ 1,035
2 BR	\$ 573	\$ 765	\$ 956	\$ 1,147	\$ 1,243
3 BR	\$ 662	\$ 883	\$ 1,103	\$ 1,324	\$ 1,434
4 BR	\$ 738	\$ 985	\$ 1,231	\$ 1,477	\$ 1,600

SEDGWICK	30%	40%	50%	60%	65%
0 BR	\$ 354	\$ 472	\$ 521	\$ 521	\$ 521
1 BR	\$ 379	\$ 505	\$ 524	\$ 524	\$ 524
2 BR	\$ 454	\$ 606	\$ 697	\$ 697	\$ 697
3 BR	\$ 525	\$ 700	\$ 875	\$ 881	\$ 881
4 BR	\$ 585	\$ 781	\$ 976	\$ 1,007	\$ 1,007

SUMMIT	30%	40%	50%	60%	65%
0 BR	\$ 476	\$ 635	\$ 793	\$ 952	\$ 1,031
1 BR	\$ 510	\$ 680	\$ 850	\$ 1,020	\$ 1,067
2 BR	\$ 612	\$ 816	\$ 1,020	\$ 1,224	\$ 1,326
3 BR	\$ 706	\$ 942	\$ 1,178	\$ 1,413	\$ 1,531
4 BR	\$ 788	\$ 1,050	\$ 1,313	\$ 1,576	\$ 1,707

TELLER	30%	40%	50%	60%	65%
0 BR	\$ 423	\$ 565	\$ 666	\$ 666	\$ 666
1 BR	\$ 454	\$ 605	\$ 756	\$ 803	\$ 803
2 BR	\$ 545	\$ 727	\$ 908	\$ 1,044	\$ 1,044
3 BR	\$ 629	\$ 839	\$ 1,049	\$ 1,259	\$ 1,364
4 BR	\$ 702	\$ 937	\$ 1,171	\$ 1,405	\$ 1,522

WASHINGTON	30%	40%	50%	60%	65%
0 BR	\$ 354	\$ 472	\$ 590	\$ 590	\$ 590
1 BR	\$ 379	\$ 505	\$ 607	\$ 607	\$ 607
2 BR	\$ 454	\$ 606	\$ 697	\$ 697	\$ 697
3 BR	\$ 525	\$ 700	\$ 875	\$ 903	\$ 903
4 BR	\$ 585	\$ 781	\$ 976	\$ 1,068	\$ 1,068



2017

ANNUAL REPORT



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To all of the elected officials and prior SMRHA Board members, thank you for your support over the many years, and requests for services and information from SMRHA. We are here to serve the region.



SAN MIGUEL REGIONAL HOUSING AUTHORITY

SMRHA STAFF

The Executive Director (E.D): Shirley L. Diaz (October 2006-present)

Ms. Diaz came to the southwest region 12 years ago after living in northern Colorado for 12 years. Ms. Diaz attended Antioch University, Los Angeles branch for her B.A. and then UCLA for a Masters in Education. She had several career changes prior to bringing her organizational development and doctoral studies in leadership and policy to the administration of SMRHA.

The E.D. is responsible for all daily operations of the organization, for all programs. The supervision of staff, all of the financial responsibilities for the organization, and the public relations of the organization are all priorities. The E.D. has assumed some of the day to day housing program responsibilities since 2010, along with training new staff in the housing programs and procedures. One Housing Choice Voucher client file is maintained by the E.D. in addition to oversight of the program.

Local Housing Program Manager: Elke Mullins (March 2002-present)

Ms. Mullins is originally from Germany, and moved to the United States in 1983. She has been in the Telluride area since 1998. Elke has three daughters, four grandchildren and two dogs that fill her down time. Ms. Mullins created the original website for SMRHA and revised and maintained it over the years and is self-taught. She has been the IT troubleshooter for the computers and any issues we have with programs or systems. Some of these duties have been modified as SMRHA has acquired services to protect our equipment and information. Ms. Mullins continues to be the primary contact for updating the website pages and for our Classifieds page.

This position administers the Housing Choice Voucher Program (formerly called Section 8), including client case management, working with the landlords, reporting, and updates to the program's administration. The person in this position must also complete inspections whenever a new place of occupancy is chosen by a client in addition to bi-ennial inspections on existing units. SMRHA staff complete State training to aid with inspections. In 2017, Ms. Mullins began learning more about the deed restricted programs to move past just accepting applications, into processing and compliance training. The cross-training is on-going into 2018.

Local Housing Program Specialist: Jeanne Walker (October 2017-present)

Ms. Walker has been a local Telluride resident since 2004. She has 2 children, 6 grandchildren and a constant, faithful companion, Jaz, her dog. She hails from Lake Geneva, WI where she had a retail business for many years. Jeanne has been involved in the mortgage industry, property management, and the hospitality industries here in Telluride. She is an accomplished sailboat racer and the past commodore of her sailing club. Jeanne earned a Bachelor of Arts degree from Gateway College in Wisconsin.

The position is responsible for administration of all of the housing deed restricted programs. The position completes Compliance checks for all of the jurisdictions. Assists applicants in qualifying to occupy and/or own deed restricted properties, and preparing exceptions for presentation to the appropriate government. The position is also responsible for preparing closings, options to purchase, and other documents on behalf of and in conjunction with the governments. The position also responds to public inquiries, and updates forms and other materials. This position turned over in 2017 and Ms. Walker was the new hire in October. She

ended the year learning Town of Telluride compliance and application processing. Training in the many areas of deed restriction work and SMRHA functions continues into 2018.

Administrative Assistant: Carla Kennington (November 2016-present)

Ms. Kennington is originally from the east coast. She grew up on the beaches of North Carolina, South Carolina, and Virginia. Her curiosity for learning influenced a wide variety of college majors, such as paralegal studies, computer networking, environmental economics & policy, and firearm science. After leaving the east coast to live in Hawaii, Texas, and finally Colorado, Ms. Kennington eventually found her home in the San Juan Mountains. She is a mother, avid outdoor person, and enjoys many hobbies.

The Administrative Assistant position was introduced in 2016. The position provides administrative support for all the housing programs. The work involves accepting applications, creating property files, tracking foreclosures, working with the public, and assisting with backlog work. The position also assists with updating records and databases for reporting, organizing files, creating new systems as needed, and working on special projects. Ms. Kennington also was trained to support Compliance in both Telluride, San Miguel County, and Mountain Village by the end of 2017.

Local Volunteer: Pamela Pettee (April 2016-present)

In March of 2016 Pamela Pettee, local retiree, engaged citizen, former Telluride Town Council member, and ski instructor, inquired if SMRHA was in need of volunteer services. Ms. Pettee has continued to offer weekly volunteer time to the organization. She is credited with 60 hours of volunteer time in 2017 working on compiling housing articles and placing them on an external drive to be added to our website, creating homebuyer education folders, culling files, filing, re-organizing filing cabinets with SMRHA staff, and shredding. She has continued to offer her invaluable time into 2018.

Administration of Programs

The daily work of the deed restricted housing programs was handled by the Executive Director (E.D.), and SMRHA staff. All 3 staff positions began various deed restricted training in 2017. The E.D. trains staff while working on the day to day operations and oversight of program administration. Although there was turnover in 2017, cross training for Compliance checks was initiated and all 3 staff played a role in contacting owners and renters, unless there was an issue with the owner or renter. The E.D. and legal confer to determine next steps when there is a problem. All of the programs' applications for rent, sale, and exceptions were handled as efficiently as possible, as were refinances.

The Housing Choice Voucher Program, formerly known as the Section 8 program, continues to require some attention from the E.D. for client issues, and hearings out of County to help other housing organizations. The SMRHA Administrative Assistant is certified to conduct inspections for the program, other staff may pursue certification in 2018.

Closings remained steady from the beginning through the end of the year. Local title companies continue to ensure they have all the necessary deed restricted and down payment assistance documents for closings by including SMRHA staff in the Title Commitments. The title companies also have been providing the original documents or copies as requested and providing the collected fees. The legal departments in all three jurisdictions were utilized for their respective

deed restriction guidelines to review documents, guideline issues, or processes. SMRHA continued to provide Down Payment Assistance and Closing Cost Loans to buyers.

The housing counseling services for the region consisted of pre-purchase homebuyer education classes. The E.D. follows up with attendees as they request additional information or a meeting. Homebuyer education classes were offered throughout the year. More details will be provided in Section 4.

Administration of the Organization

The E.D. is responsible for the day to day operations and administration of all aspects of the organization. The SMRHA Board oversees SMRHA through monthly accounting and updates from the Executive Director. The SMRHA Board alternates its roles annually. In 2017 Kim Montgomery was the Chair and Lynn Black the Treasurer. Greg Clifton, Diane Kipfer, and Ross Herzog all had the role of Vice-Chair in 2017. The changes were due to Greg Clifton's departure from the Town. Shirley Diaz remained the Secretary as staff. The SMRHA Board met for 10 meetings, with the April and September meetings cancelled. The meetings include a financial update, other organizational updates, and items for action or discussion. The SMRHA Board meeting agendas are posted for the public on a bulletin board in the SMRHA/Shandoka Office, on the SMRHA website, and are available upon request.

Fiscal Administration

A budget update continues to be presented at the SMRHA Board meetings in the format of revenue vs. expenses based on the approved budget and the percentage expended to date. There is a copy of the January through December 2017 Revenue vs. Expenses on pages 25-26 of this report. The Board is provided balance sheets for all of the accounts monthly. The accounts continue to be reconciled and are reviewed by the Board Treasurer and the Independent Auditor. The organization operated within the approved budget and ended the year with carry-over funds.

A contract for a Needs Assessment was initiated at the end of the year with Economic Planning Systems (EPS) and RRC & Associates. The project is being paid for by Reserves and some additional funding from Mountain Village for specific information they have requested.

LOCAL HOUSING PROGRAMS-Regional Overview

Regional Deed Restriction Administration

SMRHA handles applications for rent and purchase, exception requests from unqualified applicants or for items that always require an exception, prepares closing documents, computes maximum sales prices, completes compliance for all the jurisdictions, and any other service needed to help the public, renters, landlords, developers, sellers, and buyers. Housing related matters continue to come in from the public, staff from the gov'ts, realtors, title companies, lenders, appraisers and developers. SMRHA staff met with and spoke with prospective developers of housing projects throughout the region. Typically Guidelines were reviewed regarding qualifications and then they were referred to the jurisdiction the land was located in.

The staff and the E.D. also provided on-going assistance to owners and occupants to help them remain in compliance regarding owner-occupancy, resale, capital improvement costs, refinancing, leaves of absence, rental procedures, and other special circumstances. We provide current lender information to deed restricted buyers and to owners for refinances. We also respond to inquiries and collect rent from Shandoka residents as needed when the Shandoka Office staff is out of the office.

SMRHA worked with staff and legal departments for all three governments during the past year regarding guideline amendments and housekeeping, mitigation units, compliance issues, legal clarifications, exceptions, and violations. Local lenders continue to work with SMRHA to provide updates and receive documents relating to sales to update their underwriting departments. The lending market has recovered and new products with a lower down payment are being offered to buyers. There were 44 successful deed restricted closings in 2017.

The staff responded to all contacts by email and phone and worked with all walk-ins regarding the organization, participation in events, education outreach both locally and regionally, the deed restrictions, Section 8 and all other housing programs during 2017. There are, on average, over 800 emails, calls, and walk-ins each month for staff to handle.

Regional Database and Property File Management Overview

As part of our work for closings, exceptions, foreclosures and compliance, document retrieval is completed throughout the year at the San Miguel County Recorder's office as time allows. Property files were also worked on throughout the year due to Compliance checks and closings. Database updates were worked on by the Administrative Assistant and the Housing Specialists. It is an on-going task with property sales. The Administrative Assistant worked with staff and continued to improve on the property files, forms, and the databases.

Regional Deed Restriction Administration

In 2017 we had **157** applications for purchase, rental, and/or occupancy. We also reviewed documents submitted as part of compliance. In 2017, Compliance occurred in all 3 jurisdictions, but continued into 2018. Changes in staff, additional responsibilities, and training in procedures, all required time in order for the processes to be completed correctly. At the request of Special Counsel for the County and the Town of Telluride, SMRHA staff provided requested support for owners the jurisdiction was enforcing default and violation remedies.

- There were **71** Applications to Purchase processed and there were **2** purchases through the Town where an application was not required. There were **44** closings in 2017. Several buyers applied for multiple units. There were **5** Applications for the Mendota 1A Lottery included in the count. There were **11** applications from 2016 carried over into 2017 for closing, including all **8** Spruce House Applicants who won the lottery and were assigned a unit.
- There were **14** Applicants who did not purchase either by cancelling their contract, withdrawing their application or not provided complete information. Of the 14, **2** applicants requested their application be held. At this time, they would need to provide updated information in order to pursue a purchase.
- There were **86** Applications to Rent submitted.
- There were **29** notifications of an Intent to Sell and/or Rent submitted, but many owners who do not need a Maximum Sales Price calculated did not submit the form, even though the deed restriction requires it.
- There were **9** Maximum Sale Prices calculated for the sale of units in Lawson Hill and Telluride and **2** Initial Sales Prices for 2 units in Telluride.
- There were **24** Exception requests in the region.
- There were **3** hearings with the San Miguel County Housing Authority.
- There were **3** County Administrative Exceptions provided by staff.
- There were **39** sets of closing documents provided to title companies for the DR units purchased.
- There were **25** refinances noticed to SMRHA. There were **6** Options provided for closing. All but **4** refinances closed by the end of the year. There were **9** in unincorporated San Miguel County and **1** additional home had an ADU, which prompted contact with SMRHA. There were **9** in Town of Telluride deed restricted units, only **4** received a new option. Of the remaining units, **1** unit closed without an option and the lender will have to sign after the fact and the others were Home Equity Lines of Credit which did not require Options. There were **7** in the Town of Mountain Village, including **1** Coyote Court unit and **1** Cassidy Ridge which required new Options.
- Collected fees for all applications and all RETA/RETT collections/exemptions for all deed restriction related sales.
- Assisted buyers, sellers and their agents/attorneys with Initial Sale Price (ISP) and Maximum Sales Prices.
- Assisted owners regionally, regarding the specific inquiries listed below, including how to maintain compliance regarding:
 - Title changes (adding or dropping a co-owner)
 - Acknowledgments required due to title changes
 - Owner-occupancy, non-rental co-occupancy
 - Leave of Absence (LOA) exception requests
 - Sale procedures
 - Rental procedures; review of leases

Regional Monitoring & Enforcement

The Town of Telluride and San Miguel County continued enforcement on non-compliant owners based on the requirements of the deed restriction. SMRHA aids in the collection of information, but Special Counsel in each jurisdiction handles enforcement. Both the County and the Town of Telluride pursued enforcement in 2017. Mountain Village owners who were non-responders during the last Compliance were the first contacted at the end of 2017. SMRHA obtains documentation for compliance throughout the region whenever a potential issue is referred to us. We also collect Compliance when owners refinance if we do not have current information in the property file. Affirming the household is compliant with their deed restriction is a stated condition in the Requirements of a Title Commitment.

Regional Policy & Guidelines Changes

The Executive Director worked with the Telluride Housing Authority Subcommittee on revising the Telluride Affordable Housing Guidelines for 3 months in 2017. The work continued into 2018 before final adoption on April 3, 2018. The Guidelines were also updated with new Area Median Incomes in July of 2017. SMRHA continued to work with the legal departments on revisions to documents related to deed restriction program administration, and worked on exception and exemption agreements for recording.

Regional Foreclosure Information

- Public Trustee sale notices were monitored, any deed restricted status was confirmed and government partners updated as necessary for protection of DR and public investment.
- **8** properties in San Miguel County were noticed for foreclosure in 2017, and **0** were deed restricted properties.
- There were **7** properties carried into 2017. **2** are bankruptcies.
- **9** properties were withdrawn in 2017 and **1** of the withdrawn notices was cured.
- **2** properties were sold to the holder in 2017.
- **4** properties were carried into 2018 pending sale/withdraw/cure/bankruptcy.
- Of the **7** properties carried over into 2017, **1** was a deed restricted unit from 2012 in bankruptcy and **1** a Free Market unit in bankruptcy.
- **5** properties re-sold subsequent to being withdrawn/cured or sold to the lender. **2** were still held by the primary lender.
- There were no deed restricted units re-sold after foreclosure noticing in 2017.

The following table is an overview of sales price averages for properties in San Miguel County that were foreclosed on and then resold.

Transactions in 2017 related to Foreclosure Noticing as of 12/31/17 and earlier (This represents purchase by private party at/prior to Public Trustee sale and "RESOLD" by Holder after Foreclosure.)				
Outstanding Principal (OP*)	# Sold	Average % of OP* paid	# DR'd	Average % of OP* paid
> \$1,000,000	NA	-	-	-
\$750,000 - \$999,999	NA	-	-	-
\$500,000 - \$749,999	2	168%	-	-
\$250,000 - \$499,999	2	100.5%		
<\$249,999	1	135%		

Applications:

Applications by Jurisdiction	COUNTY	TELLURIDE	MOUNTAIN VILLAGE
Applications to Purchase for 2017			
Approved- includes multiple Applications from several Households	19	24	6
Withdrawn	3	7	1
Returned/Incomplete	2	2	0
Denied	3	3	0
On Hold	1	0	0
Total Applications to Purchase/Occupy	28	36	7
# of Properties to Purchase/Occupy	24	17	7
Applications to Rent			
Approved to Rent/Occupy	24	23*	24
Conditional Approval	0	0	0
Incomplete	2	4	0
Denied/Withdrawn	1	7	1
Total Applications to Rent	27	34	25
Total Applications Processed	55	70	32

*Includes Applications from multiple households for the same property

Exceptions & Other Items Before Housing Committees & Boards:

Exception Applications Handled	COUNTY R-1/New Cov	TELLURIDE	MOUNTAIN VILLAGE	DPCC
Granted	8	11		
Denied		1		
Withdrawn/postponed	2			
Exception Extensions by Hearing	1			
Work Session/Subordination		2		
Hearings	2			
Administrative Exception	3			
Total Exceptions 2017	16	14	0	0

The breakdown of the **30** exceptions and other items is as follows by jurisdiction.

San Miguel County Exceptions and Hearings:

- **2** exception requests were cancelled by the applicants before going in front of a Board.
- **2** of the approved requests were for a Leave of Absence.
- **1** of the approved requests was for Public Sector employment to include a federal employee position working from home and ownership of an undeveloped lot.
- **1** of the approved requests was for permission to go on Title to help a former spouse purchase a free market unit.

- **1** approved request was for permission to rent to prospective buyers for 1 year until the renters could qualify to purchase.
- **1** approved request was for a Leave of Absence and permission to rent while absent.
- **1** approved request was for additional time to meet the Local Employee Standard.
- **1** approved request was for an extension on an expired agreement to sell undeveloped lots.
- **3** hearings were held by Special Counsel for San Miguel County with the Commissioners sitting as the San Miguel County Housing Authority (SMCHA). Owners of 2 units were provided time to either come into compliance or sell their unit without a set price within a timeframe. The third owner was requesting a modification to an exception agreement for medical reasons and a determination regarding rental income.
- **3** staff level administrative exceptions were granted for owners leaving the area for less than **1** year for medical reasons or weather related repair of a home outside San Miguel County.

Town of Telluride Exceptions & Hearings:

- The **1** denied request was for a household not meeting several eligibility requirements to purchase.
- **6** approved requests were for households not meeting one or more eligibility requirements to rent.
- **1** approved request was for a Leave of Absence for school.
- **1** approved request was for a waiver of the 1% for an unqualified household. Half the fee was returned.
- **1** approved request was to include capital improvements that were not pre-approved.
- **2** approved requests were for buyers to use a co-borrower/co-signor.
- **2** work sessions were conducted:
 - **1** to provide direction on allowed capital improvements by reviewing a form created by SMRHA;
 - **1** to discuss replacements of items like roofs, windows, and other replacements that age in older deed restricted units. Owners of a Wilkin Court unit requested the discussion.

Town of Mountain Village Exceptions:

- There were no Town of Mountain Village exceptions in 2017.

DPCC Exception & Subordinations:

There were no exceptions or subordinations in 2017.

Sales or Transfers:

Deed-Restricted Transactions (Improved and Unimproved)	COUNTY R-1/New Cov	COUNTY Price-capped	TELLURIDE	TELLURIDE EDU	MOUNTAIN VILLAGE
Total # properties sold 2017	17<	1	22		4
2017 Average sale price	\$441,041	212,000	\$262,522		\$327,745
Total # properties sold 2016	13<	1	9	1	10
2016 Average sale price	\$407,615	\$246,602	\$181,619	\$280,000	\$435,866
Total # properties sold 2015	25^	1	10		8^
2015 Average sale price	\$277,976	\$111,000	\$248,476		\$253,375
Total # properties sold 2014	12		22>		13~
2014 Average sale price	\$255,929		\$217,190		\$320,146
Total # properties sold 2013	12		2		6*
2013 Average sale price	\$273,946		\$217,250		\$293,500
Total # properties sold 2012	3		5		1
2012 Average sale price	\$205,500		\$215,620		\$110,250
2011 properties transferred w/ no payment to TMVOA	1				1
2011 property transferred w/some cost					1-\$182,500
Total # properties sold 2011	3		19		4
2011 Average sale price	\$502,955		\$255,106		\$341,750
Total # properties sold 2010	3		16		3*
2010 Average sale price	\$308,333		\$253,299		\$375,417*
2009 - # properties sold	4*		13		6*
2009 Average sale price	\$318,541*		\$275,427		\$272,684*
2008 - # properties sold	4	0	4	1	7**
2008 Average sale price	\$370,250*	0	\$192,850	\$440,000	\$515,105**
2007 -# of properties sold	22	1	7		16
2007 Average sale price	\$340,245	\$316,697	\$163,602		\$433,154

< 3 Sales were unimproved Lots in 2016 and in 2017- The sale of Telluride Apartments to Telski was not included above. The sale of the Q Lots and Sunshine Valley Lots to Telski were also not included above in order to not skew the average sales prices.

^ Includes 2 Quit Claims and purchases of Undeveloped Deed Restricted Lots

* One of these was an unimproved lot

**Does not include the 2 gov't sales. This count reflects 1 Quit Claim and an aver. sale price adjustment because money did in fact change hands.

> 1 sale included the price of 2 units, but it was only counted as 1 sale for the Telluride Count.

~ 1 sale was Hotel Madeline's purchase that included the 10 DR units-no prices were established so the TMV average is based on 12 sales.

Area Median Incomes of Households:

The numbers include our carry-in households from 2016 that closed in 2017. We used the 2017 AMI Table published in the Telluride Affordable Housing Guidelines. We had household size and income based on the applications and supporting documentation submitted. There were several applicants that did not provide income information due to incomplete applications or it not being required to provide with their application. The count reflects all of the income information collected.

SMC Renter Applicants

Area Median Income	# of Households
<80%	17
<100%	2
<120%	2
<180%	2
>180%	-

SMC Purchase Applicants

Area Median Income	# of Households
<80%	6
<100%	4
<120%	4
<180%	5
>180%	4

Telluride Renter Applicants

Area Median Income	# of Households
<80%	17
<100%	6
<120%	4
<180%	2
>180%	1

Telluride Purchase Applicants

Area Median Income	# of Households
<80%	13
<100%	5
<120%	6
<180%	3
>180% -Denied	3

Mountain Village Renter Applicants

Area Median Income	# of Households
<80%	14
<100%	5
<120%	4
<180%	2
>180%	-

Mountain Village Purchase Applicants

Area Median Income	# of Households
<80%	2
<100%	1
<120%	1
<180%	2
>180%	-

Deed Restriction Programs by Jurisdiction

San Miguel County

DR Administration

SMRHA worked with County staff and legal on a number of issues regarding the deed restriction, and owner issues. The County Compliance Check continued into 2017 with the new Housing Specialist Mary Lynne Chambers, but was not completed. It will be picked up in 2018 with attempts to help owners come into compliance as a first priority. The average deed restricted sales prices were highest in the County of all the jurisdictions.

- The DR Administration Fee (1%) collected is **\$63,572.00** from **16** sales. Not all of the fees from 2017 closings were deposited by the end of the year. Not all County deed restricted sales pay the 1% fee.
- The .75% Fee, sales taxes, applications, and other fees collected was **\$64,159.00**. Not all County deed restricted sales pay the .75%. There are some fees from closings that were not deposited by the end of the year.
- Collected Lawson Retail Sales Assessment (RSA) of **\$27,042.38**. The E.D. needs to pursue payment from Ilium on the RSA. The payment is supposed to arrive quarterly or annually from them.
- There was **\$2,100.00** collected in exception fees.
- Created closing documents for the **18** closings.
- Received numerous requests for information from lenders/mortgage brokers, title companies, appraisers, and owners regarding refinance/purchase of County Deed Restricted properties.
- SMRHA was noticed about **10** County deed restricted property refinances in 2017. If we do not have current Compliance information, then we request it prior to the refinance closing. There may have been others completed without contacting SMRHA if an outside Title Company was used.
- **19** property files were created from backlog.
- The County database was updated in the fall of 2017, but as sales occur, it is an on-going task.
- Continued to educate many applicants and others interested in deed restricted housing in unincorporated San Miguel County, including lenders, attorneys, Title Companies.
- Received numerous inquiries about owner occupancy and co-occupancy, and difficulties with renters in owner-occupied units.
- Property files were updated with recorded documents and compliance responses. This is an on-going task.

Monitoring

Foreclosure Update:

- There is **1** deed restricted property still listed in the foreclosure process due to bankruptcy.

Compliance/Monitoring

- **60** properties in Lawson Hill were sent Compliance letters in 2017. **14** properties in San Bernardo received letters. Second letters were sent for non-responders. Incomplete responses staff followed up on with the owners. The rest of Lawson Hill was not completed and will continue into next year. Several Non-Compliant households were referred to Special Counsel and 3 met with the Commissioners. Since the Compliance stopped with a change in staff, some non-responders or incomplete responders will be contacted in 2018.
- Some monitoring in the region through our web-site, and other media occurred throughout the year. Any Deed Restricted properties noticed for sale or rent resulted in owners being contacted to assist with renter qualification and referrals.

Policies, Guidelines, and Master Documents

- Continued to make revisions to forms as needed due to Lawson Hill being able to adopt the Covenant.
- The E.D. and staff worked with the County attorneys on exception documents, the hearings, and other research as needed.
- A new Multi-family Covenant was approved by the BOCC to offer to owners.

Town of Telluride

DR Administration

Town of Telluride compliance continued through the legal department on several properties with SMRHA supporting the process through document gathering and research. SMRHA also conducted a lottery for Mendota A1. The exception and application breakdown were provided in the table above.

- Total fees collected for the Town were **\$10,828.16**. The 1% fee collected was **\$9,836.61** from **4** property sales and includes a 50% refund to one seller.
- There were **7** Notices of Intent to Sell in 2017 and **5** of these units closed in 2017. **2** units have carried into 2018.
- Assisted owners of price-capped units with allowed capital improvement costs. **1** exception was approved and listed above.
- Calculated Maximum Sale Prices for **8** units. One was sold by Lottery.
- We were noticed about **9** owner refinances in 2017, **6** closed in 2017. **1** was scheduled to close in 2018, and **2** were never scheduled.
- Spoke with developers/agents for multiple properties interested in developing affordable housing.
- Staff received requests for information from lenders, title companies, appraisers, and owners regarding purchasing and refinancing throughout the year.

Monitoring

Compliance Check

Compliant Summary AHU

- **35** owner occupied properties were being tracked for compliance when the **2017** occupancy check occurred. (Compliance continued in 2018)
 - **10** properties did not receive notices in 2017 – units that have had recent transactions were not required to provide additional information. Units with non-compliance issues already known were either already being handled by Town legal or were referred to them.
- **25** Compliance letters were sent.
 - **17** completed responses were received by the end of the year.
 - **8** responses were incomplete and continued to be contacted, some with 2nd notices going into 2018.
 - Non-Compliant owners will be referred to the Town Legal Department in 2018.
- **AHU Compliance (rental units)**
 - **43** properties were being tracked for compliance when the 2017 occupancy check occurred.
 - **11** Compliance letters were sent, plus Creekside Management for updates on all **26** units.
 - **9 plus all 26 units for Creekside were** received by the end of 2017
 - **2** Non-responders were contacted into 2018
 - Rentals not contacted in 2017, were added to the 2018 list

Compliant Summary Town Constructed

- **73** properties were being tracked for compliance when the **2017** occupancy check occurred. (Compliance continued in 2018)
 - **33** properties did not receive notices in 2017 – This included units which had transactions in the past year, such as purchasing a unit, refinancing, or were already noticed about a compliance issue and were working with SMRHA or Town Legal.
 - Several property owners not contacted in 2017 will be contacted in 2018
- **39** Compliance letters were sent.
 - **22** completed responses were received.
 - **16** 2nd notices sent in 2017, follow-up continued into 2018 with incomplete owner responses.

EDUs-30 units

- The Compliance process for these units was not started until 2018 due to change in staff.

Foreclosure:

- **0** Town deed restricted units were noticed for Public Trustee Sale in 2017.

Mendota Lottery

- There were **5** applications and the breakdown was included above. All households qualified. The unit was assigned in 2017 and closed in 2018. There were no exceptions needed for applicants.
- There were **4** Open Houses where all the paperwork was provided. Staff was there to help applicants understand the Lottery process
- **19** people attended the open houses.
- Lottery Applicant information was included in the Application Table above.

Policies, Guidelines, and Master Documents

- The Telluride Affordable Housing Guidelines: Appendix A and associated tables were updated in July of 2017, utilizing HUD's published Area Median Income for the county.
- The Guidelines were reviewed at multiple THA subcommittee meetings from September 2017 into 2018. Adoption of a new version was completed in April of 2018.

Town of Mountain Village

DR Administration

SMRHA worked with the legal department to secure a deed restriction that does not go away with a foreclosure, on a price-capped unit that was over-burdening the property. SMRHA created new documents for Mountain View applicants and also created new files for all of the units. Telski staff assigned to manage the units worked with SMRHA and it was a smooth process. The Needs Assessment to be completed in 2018 will have a special Mountain Village component for the expansion of VCA.

- **\$2400.00** was collected in application and administrative fees in 2017. There was **1** Admin. Fee collected at the end of 2016 for the sale of a Cassidy Ridge deed restricted unit. It was provided to the Town in 2017.
- There was **1** Notice of Intent to Sell in 2017, for a price-capped unit. The unit sold to Mountain Village in 2018.
- **9** property files were created and updated from backlog and sales.
- The Mountain Village database was also updated with **36** new owners and renters.
- A database for Mountain View apartments was created.

Monitoring/Compliance Check

Compliance Check

The E.D. realized Compliance had not been completed in 2017 with prior staff and had staff initiate all new contact in 2017 and into 2018. The list of non-compliant owners from the prior years were contacted first. The Legal Department will be provided a list once all effort is exhausted. The Compliance letters were converted into fillable forms and owners receiving them made very favorable comments. All owners will receive fillable forms in the future.

- In 2017 **36** units were contacted.
- **19** responses were received by the end of the year.
- The rest of the owners continued to be contacted going into 2018 and most other households will also be contacted. Property owners of undeveloped lots were not contacted unless the lot was developed since the last Compliance check.

Foreclosure

- **0** TMV deed restricted properties were noticed for Public Trustee Sale in 2017.

Policies, Guidelines, and Master Documents

- New rental documents and internal work documents for the administration of Mountain View Apartments were created.
- A new deed restriction was generated for a Cassidy Ridge owner refinancing.
- SMRHA continued to work with the Director of Community Development and Planning as needed.

Down Payment & Closing Costs Assistance Program

In 2017 there were 2 loans provided to local buyers. One owner was under 100% of our Area Median Income (AMI) and the other was under 140% AMI. There was approximately \$112,508.00 in the account at the end of 2017 for new loans. One loan was repaid in 2016, but the funds were deposited in 2017. The full repayment of the loan is included in the Table.

DPCC Loan Summary:

Year Approved	Total Loans Issued	Loans Paid Off in 2017	Payoff Amounts Rec'd		Outstanding Principal	Total Loans Paid Off
			Principal	Int/Apprec		
2001 loans	10					10
2002 loans	3					3
2003 loans	9				\$4,350.00	8
2004 loans	5	1	\$10,000.00	\$2,900.00		5
2005 loans	6	1	\$10,000.00	\$8,200.00	\$10,000.00	5
2008 loans	1				\$10,000.00	
2009 loans	2	1	\$10,000.00	\$3,726.00	\$17,500.00	1
2010 loans	0					
2011 loans	6	1	\$9,735.00	\$515.00	\$39,667.00	3
2012 loans	5	1	\$9,855.00	\$895.00	\$26,750.00	2
2013 loans	1				\$10,000.00	
2014 loans	3				\$22,000.00	1
2015 loans	2				\$17,500.00	
2016 loans	2				\$17,445.00	
2017	2				\$20,000.00	
Total	57	5 in full	\$49,590.00	\$16,236.00	\$195,212.00	38

* DP&CC loans after 2001, can be paid off at 5% per year, if paid within 3 years, or at a rate tied to the appreciation of the property. Loan terms have been altered several times since 2001.

Mortgage Credit Certificate Program

The statewide MCC program administered by CHFA started up again in 2017. The cost of the loan was increased to \$1000.00. We continued to provide information about the program during homebuyer education classes and while speaking with buyers. No one has used the program in Sam Miguel County in many years.

SECTION 8

Overview of Section 8 Program Administration

The Housing Choice Voucher Program Manager continues to operate out of two (2) offices and splits the week with two days in Telluride and two in Norwood. The majority of our vouchers are with Norwood residents and the donated county office space provides clients with in person attention saving them travel costs to Telluride.

We were administering **48** Vouchers at the end of 2017. We received a total of \$23,775.08 in voucher administration fees for the program in 2017. (November and December 2016 fees were deposited in 2017 increasing out total deposited by \$4,142.00). Our waitlist was closed on March 1, 2016 due to the State program freeze as of January 15, 2016. The waitlist remained closed the entire year in 2017. The State lifted their freeze in early 2017 and we began reissuing Vouchers, but they later froze the program again and we lost Vouchers we had gained back. In 2017 local landlords received \$140,823.00 in rent and the utility allowances paid to Tenants totaled \$2,049.00.

Walk-in inquiries are fielded primarily by the Program Manager and the E.D., but all office staff help clients if needed. There were no applications accepted in 2017.

The Program Manager attended the monthly webinar trainings about various parts of the Housing Choice Voucher (HCV) program, the webinars were provided by CDOH. The E.D. attended 1 out of town training for Housing Choice Voucher Program Managers. The Elite System is still time consuming as several operations go down throughout the year and the state staff has to fix or enter the information on behalf of staff. The State also continues to make changes in Elite to refine its operating systems for staff in Elite daily. We are required to maintain a paper or electronic file in addition to the information in the system. VCA and Shandoka both continue to accommodate Section 8 clients with rents that meet the maximum rent calculations from the state. Staff work with the property managers to resolve issues if and when they arise whether it is regarding the payment standard, payment from the client, or something else related to the program or the client. The Program Manager also maintains files for all clients, except one, which is in the hands of the E.D. due to a conflict of interest.

- **2** households were added this year.
- **2** households ported into the county.
- **1** household ported out of the county.
- Processed **5** families and issued Vouchers, but they all failed to find a place to lease up.
- Processed **2** families and issued Vouchers, and they used the Voucher in another county to lease up.
- **9** families were offered Vouchers, but either declined or did not attend their required meeting, and failed to re-schedule.
- **1** active participant was holding a voucher at the end of the year while moving. This is not counted as an administered voucher.
- Section 8 rules and regulations were explained to the prospective landlords for moves and the 3 household who found places.
- Monitored the CDOH Web Page for changes in HUD rules and forms at the end of each week. Implemented changes and rules as needed.

- All staff helped with walk-ins by collecting annual and interim documents, responding to general program questions, and taking any other documents or messages from participants.
- Completed **41** annuals, 2 involved the household moving. An annual involves complete recertification of the family under the program Guidelines.
- Completed **10** interim recertifications, due to changes in the household size and/or income. One interim was for the file the E.D. manages.
- Conducted **16** annual inspections.
- **5** initial inspections due to lease ups.
- **8** re-inspections as a result of the unit failing one the first visit.
- There were **2** families that left the program by choice or termination.

Agency Relationships

- Worked with the state staff on documentation and reporting questions.
- Worked with the property managers at Shandoka and Village Court Apartments on client rents, annuals, and unit issues that arose throughout the year.
- Complaints-There were no complaints in 2017 that escalated. Staff was able to work with the client or landlord to resolve the issue.
- The staff responded to all contacts from the public and tenants or landlords in a timely manner.
- The E.D. was requested as a hearing officer for 4 informal hearings for a Housing Authority. Two of the clients requesting the hearing did not attend and the hearing was cancelled.

Training

- Attended the following online Webinar Trainings. Each webinar runs approximately 2 hours once a month.
 - Elite Update Session and 2 Elite Question & Answer Sessions
 - Medical Expense Calculation
 - Terminations/Tenant Conferences
 - 2 HQS (Inspection) trainings
 - Homeownership process
 - Reasonable Accommodations
 - Repayment Agreements

Section 8 Clients

This chart reflects all Adult clients that were on the program on Jan. 1, 2008 and all new ones added through 2017. This will remain a continuous count as beginning again would have created accuracy issues.

Breakout of Adult Section 8 Clients – 144 since Jan. 2008				
Working	Disability	Social Security	Not Working	Other
45.14%	17.36%	14.58%	16.67%	6.25%

Housing Needs of Families in San Miguel County based on Placements Since January 2008- 128 Families, 255 Individuals					
Family Type	Overall YTD	1 Bdrm	2 Bdrm	3 Bdrm	4 Bdrm
Income <= 30% of AMI	94.53%	27.3%	29.7%	18%	19.4%
Income >30% but <=50% of AMI	5.47%	1.6%	0.8%	2.4%	0.8%
Elderly	10.94%				
Families with Disabilities	25.78%				
Race/Ethnicity White	*83.14%				
Race/Ethnicity Hispanic	*12.94%				
Race/Ethnicity African American	*1.96%				
Race/Ethnicity Other	*1.96%				
*percentages are based on individuals not family					
Locations	Telluride	Placerville	Norwood	Ophir	Other
	44.53%	.79%	46.09%	2.34%	6.25%
Break-up of Telluride alone	Telluride	Mountain Village			
	72%	28%			

EDUCATION AND OUTREACH

Education and Outreach

The E.D. offered **8** homebuyer education classes in 2017. All classes were held in San Miguel County. There were **17** households that attended **4** of the 8 classes offered. **5** households purchased homes by the end of the year. There were **6** households between 50-79%AMI, **4** households between 80%-100% AMI and **7** households over 100% AMI.

Colorado Mountain Housing Coalition

The Colorado Mountain Housing Coalition (CMHC) only held a Rural Housing Summit this year. The group continued to offer a rural workshop day, with an additional full day devoted to a Professional development and a Section 8 session. The workshops were voted on and several people then organized the ones with the most interest. The theme this year was Building Capacity in Iffy Times. The topics included Implementing Coordinated Entry in Communities, Updates from the Feds, What Doesn't Kill You Makes You Stronger, and High Performing Housing Agencies. The Keynote speaker was Troy Gladwell the President of CONAHRO. The presentations were engaging and attendees walked away with new knowledge. Then the Division of Housing staff presented Best Practices in Uncertain Times and several agencies drove in just for that session. In total, our meetings represent 17 counties and 21 organizations/agencies. The E.D. is currently the Vice President of Education and Outreach and a voting member on the Board.

Other Outreach

The Ouray County Housing Authority (OCHA) became the Ouray County Housing Advisory Committee (OCHAC) and began working on a strategic plan to determine what the County needs and how to approach it. The group also coordinated a public forum with ROCC for the public and Ms. Diaz presented on housing affordability and lenders. The county-wide Guidelines were put on hold as the strategic plan became a priority.

Web Page Information

SMRHA's webpage files are currently maintained by Peak Media out of Ridgway, Colorado. All files can be supported in-house and Elke Mullins is the primary staff person maintaining the website. Members of the public can contact us via phone, email, or in-person regarding our website and any of its features. Elke responds to most inquiries and issues. Peak Media monitors the site and completes updates as needed.

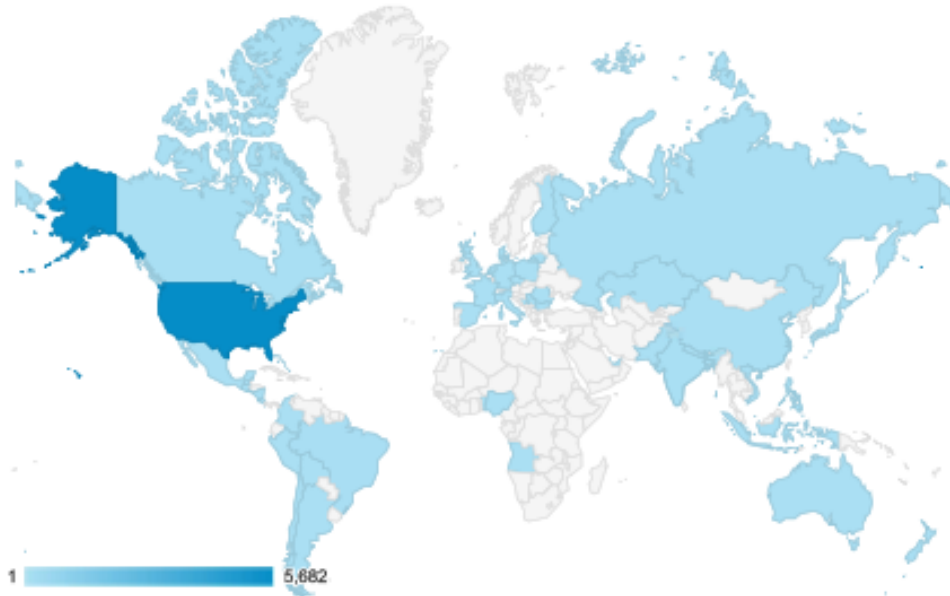
Location

All Users
100.00% Users

Jan 1, 2017 - Dec 31, 2017

Map Overlay

Summary



Country	Acquisition			Behavior			Conversions		
	Users	New Users	Sessions	Bounce Rate	Pages / Session	Avg. Session Duration	Goal Conversion Rate	Goal Completions	Goal Value
	6,014 % of Total: 100.00% (6,014)	5,879 % of Total: 100.09% (5,874)	10,720 % of Total: 100.00% (10,720)	19.91% Avg for View: 19.91% (0.00%)	6.25 Avg for View: 6.25 (0.00%)	00:02:47 Avg for View: 00:02:47 (0.00%)	0.00% Avg for View: 0.00% (0.00%)	0 % of Total: 0.00% (0)	\$0.00 % of Total: 0.00% (0.00)
1. United States	5,682 (94.40%)	5,547 (94.35%)	10,354 (96.59%)	19.25%	6.36	00:02:50	0.00%	0 (0.00%)	\$0.00 (0.00%)
2. Brazil	50 (0.83%)	50 (0.85%)	50 (0.47%)	92.00%	1.18	00:00:20	0.00%	0 (0.00%)	\$0.00 (0.00%)
3. (not set)	39 (0.65%)	39 (0.66%)	42 (0.39%)	4.76%	2.19	00:00:14	0.00%	0 (0.00%)	\$0.00 (0.00%)
4. Canada	31 (0.52%)	30 (0.51%)	31 (0.29%)	83.87%	2.32	00:00:27	0.00%	0 (0.00%)	\$0.00 (0.00%)
5. Philippines	30 (0.50%)	30 (0.51%)	35 (0.33%)	28.57%	3.49	00:02:16	0.00%	0 (0.00%)	\$0.00 (0.00%)
6. India	22 (0.37%)	22 (0.37%)	24 (0.22%)	25.00%	2.67	00:00:23	0.00%	0 (0.00%)	\$0.00 (0.00%)
7. Czechia	18 (0.30%)	18 (0.31%)	19 (0.18%)	26.32%	2.05	00:00:05	0.00%	0 (0.00%)	\$0.00 (0.00%)
8. Australia	13 (0.22%)	12 (0.20%)	15 (0.14%)	46.67%	3.07	00:01:35	0.00%	0 (0.00%)	\$0.00 (0.00%)
9. Germany	13 (0.22%)	13 (0.22%)	13 (0.12%)	30.77%	3.08	00:00:18	0.00%	0 (0.00%)	\$0.00 (0.00%)
10. China	12 (0.20%)	12 (0.20%)	12 (0.11%)	0.00%	2.00	00:00:01	0.00%	0 (0.00%)	\$0.00 (0.00%)
11. Spain	12 (0.20%)	12 (0.20%)	15 (0.14%)	13.33%	5.73	00:02:25	0.00%	0 (0.00%)	\$0.00 (0.00%)
12. New Zealand	7 (0.12%)	7 (0.12%)	8 (0.07%)	0.00%	10.88	00:05:58	0.00%	0 (0.00%)	\$0.00 (0.00%)

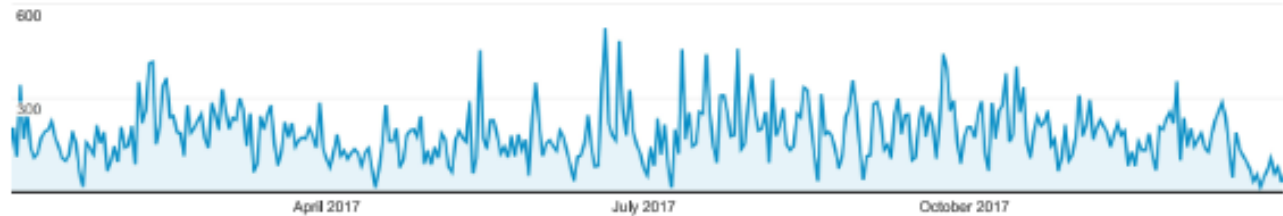
Pages

All Users
100.00% Pageviews

Jan 1, 2017 - Dec 31, 2017

Explorer

Pageviews



Page Title	Pageviews	Unique Pageviews	Avg. Time on Page	Entrances	Bounce Rate	% Exit	Page Value
	66,983 % of Total: 100.00% (66,983)	30,386 % of Total: 100.00% (30,386)	00:00:32 Avg for View: 00:00:32 (0.00%)	10,708 % of Total: 100.00% (10,708)	19.91% Avg for View: 19.91% (0.00%)	15.99% Avg for View: 15.99% (0.00%)	\$0.00 % of Total: \$0.00 (0.00%)
1. housing-classifieds - San Miguel Regional Housing Authority	13,403 (20.01%)	4,573 (15.05%)	00:00:20	623 (5.82%)	17.50%	9.62%	\$0.00 (0.00%)
2. HOME - San Miguel Regional Housing Authority	12,944 (19.32%)	6,436 (21.18%)	00:00:32	6,107 (57.03%)	14.04%	18.40%	\$0.00 (0.00%)
3. Town of Telluride - San Miguel Regional Housing Authority	4,706 (7.03%)	2,142 (7.05%)	00:00:53	280 (2.61%)	27.11%	23.91%	\$0.00 (0.00%)
4. DEED RESTRICTED HOUSING - San Miguel Regional Housing Authority	4,606 (6.88%)	2,053 (6.76%)	00:00:18	1,012 (9.45%)	7.58%	8.01%	\$0.00 (0.00%)
5. San Miguel County - San Miguel Regional Housing Authority	1,777 (2.65%)	878 (2.89%)	00:00:57	112 (1.05%)	39.82%	28.36%	\$0.00 (0.00%)
6. 580 Society Dr. Lawson Hill Unit 314 No 10 Elk Meadows Lot 314 - Telluride - Deed-Restricted - For Sale (Employee Housing) - Show Ad - San Miguel Regional Housing Authority	1,411 (2.11%)	846 (2.78%)	00:00:28	617 (5.76%)	61.43%	44.72%	\$0.00 (0.00%)
7. Spruce House Lottery - San Miguel Regional Housing Authority	1,309 (1.95%)	674 (2.22%)	00:00:51	105 (0.98%)	45.19%	23.53%	\$0.00 (0.00%)
8. Town of Mountain Village - San Miguel Regional Housing Authority	1,118 (1.67%)	515 (1.69%)	00:00:52	66 (0.62%)	39.39%	21.91%	\$0.00 (0.00%)
9. Browse Ads - San Miguel Regional Housing Authority	1,006 (1.50%)	312 (1.03%)	00:00:15	72 (0.67%)	31.94%	11.23%	\$0.00 (0.00%)
10. HOMEBUYER EDUCATION - San Miguel Regional Housing Authority	997 (1.49%)	480 (1.58%)	00:00:26	39 (0.36%)	25.64%	15.95%	\$0.00 (0.00%)
11. \$258,055 Ballard House deed-restricted 2 Bedroom 1 bath - Telluride - Deed-Restricted - For Sale (Employee Housing) - Show Ad - San Miguel Regional Housing Authority	989 (1.48%)	404 (1.33%)	00:00:35	40 (0.37%)	35.00%	13.65%	\$0.00 (0.00%)
12. Place Ad - San Miguel Regional Housing Authority	972 (1.45%)	238 (0.78%)	00:01:05	22 (0.21%)	31.82%	8.74%	\$0.00 (0.00%)
13. FORECLOSURE INFO - San Miguel Regional Housing Authority	957 (1.43%)	475 (1.56%)	00:00:35	23 (0.21%)	39.13%	16.09%	\$0.00 (0.00%)
14. SMRHA Staff - San Miguel Regional Housing Authority	881 (1.32%)	439 (1.44%)	00:01:10	85 (0.79%)	36.47%	36.89%	\$0.00 (0.00%)
15. Mendota A1 Lottery - San Miguel Regional Housing Authority	870 (1.30%)	303 (1.00%)	00:01:00	80 (0.75%)	21.95%	23.91%	\$0.00 (0.00%)
16. CLASSIFIEDS - San Miguel Regional Housing Authority	848 (1.27%)	490 (1.61%)	00:00:19	366 (3.42%)	4.64%	7.78%	\$0.00 (0.00%)
17. CONTACT - San Miguel Regional Housing Authority	706 (1.05%)	376 (1.24%)	00:00:47	151 (1.41%)	32.45%	27.62%	\$0.00 (0.00%)

Classified Page:

Buyers/Sellers Use of Free Classified Ads On SMRHA Web Site		
Type of Classified Ad	# of units	Average Asking Price
County DR for sale	13	\$544,692.31
Mountain Village DR for sale, 2 Lots	7	\$482,700.00
Telluride	7	\$306,964.14
Total	27	Avg. asking Price For deed restricted \$444,785.48
Free-Market for sale Avg. 3 Lots	14	\$440,214.29

Budget Summary

The Executive Director managed the 7 accounts: the General Fund, which is the primary operating account for SMRHA and holds all the fees collected throughout the year for the Towns of Telluride and Mountain Village applications and other fees, the three San Miguel County R-1 accounts, which includes a checking account for RETA, applications, and sales tax fees, a Loan Default Account and a ColoTrust account for Loan Default also, the Section 8 account which is for depositing the monthly administration fees, which then get transferred into the General account and the final 2 accounts are DP&CC checking and a DP&CC ColoTrust account.

The following pages represent the totals from January 1 through December 31, 2017. Balance statements are provided to the SMRHA Board members at each meeting for all accounts and may be requested by each government at any time. All items where more than the budgeted amounts were expended were discussed with the Board. There were no items of concern. The San Miguel County share is always reduced based on the amount collected in exception fees, which are deposited directly into the SMRHA General Account and not into a San Miguel County Account.

The program is operating under budget and we had a carry-over of \$106,860.00 upon conclusion of the 2016 audit. The approved budget for 2017 presented to all the jurisdictions included staff increases, utilizing 2016 carry-over funds as needed, and a reduction for each jurisdiction. It is anticipated that we will have a carry-over of \$90,000 from 2016 for 2017.

The E.D. continues to operate the organization under budget and the carry-over funding is the only buffer SMRHA has for unexpected expenses.

Revenue vs Expenses Jan – Dec 2017

	<u>Jan 1 - Dec 31</u>	<u>Budget</u>	<u>\$ Over Budget</u>	<u>% of Budget</u>
Revenue/Expense Budget				
2017 Budget Revenue				
Misc Revenue	1196.73	0.00	1,196.73	100%
Interest Revenue	7.74	40.00	-32.42	19.35%
R1 Exception Fee	2100.00	4,200.00	-2,100.00	50%
San Miguel County	85,676.00	87,776.00	-2,100.00	100%
Town of Telluride	87,776.00	87,776.00	0.00	100%
Town of Mtn Village	87,776.00	87,776.00	0.00	100%
State of CO Sec 8 Admin	25,125.00	25,125.00	0.00	100%
Total 2017 Budget Revenue	289,657.47	292,693.00	-3,053.53	98.96%
Payroll Expenses-salary/hrly+ benefits				
Total Payroll Expenses	247,482.02	272,953.00	-25,470.98	90.67%
Operating Expenses				
Needs Assessment	30,000.00	37,500.00	-7,500.00	80%
Rehab Prog/SW Reg Mtg	212.77	2,000.00	-1,801.50	9.93%
Internet/Web site Fees	1312.27	2,000.00	-131.00	34.83%
General/D&O Ins	3,079.00	3,600.00	-40.00	98.67%
Office Telephone	2,418.09	1,800.00	160.89	108.94%
Office Supplies	1418.09	1,995.00	505.44	133.81%
Postage/Meter rental	167.03	600.00	-315.65	47.39%
Office Furniture	2,094.08	2,500.00	-405.92	83.76%
Bank Charges	69.75	150.00	-72.00	52.0%
Mileage & Travel Incl Sec 8	1,997.87	4,756.00	-2,808.91	40.94%
Programs & Education/Outreach	1,587.99	750.00	1,019.69	235.96%
Advertising	1,923.60	3,000.00	2,738.69	191.29%
Dues & Memberships	110.00	450.00	-50.00	88.89%
EquipMaint/Repair	874.20	525.00	305.00	159.8%
Application & Grant Fees	0.00	450.00	-900.00	0.0%
Misc.Office	28.00	800.00	-269.00	10.33%
Staff Ed/Training+repayments	1,283.50	3,000.00	-2,328.42	22.39%
Financial Audit	6,200.00	6,000.00	200.00	103.33%
Section 8 CBI records	47.95	125.00	-77.05	16.44%
Legal Services	0.00	5,002.00	-5,002.00	0.0%
Board Cont.Ed & Training	0.00	300.00	-300.00	0.0%
Copier Lease & Maintenance	1,574.43	2,000.00	-425.57	78.72%

	Jan 1 - Dec 31	Budget	\$ Over Budget	% of Budget
Computer Hardware	1,202.70	1,950.00	-747.30	61.68%
Computer Software	1,449.11	1,200.00	249.11	120.76%
Rent/cleaning 12/2016-2017	8,784.16	11,505.00	-1,977.09	76.35%
Website Redesign/Misc Expenses	100.00	1,500.00	-1,400.00	6.67%
Total Operating Expenses	67,934.59	95,158.00	-22,931.84	71.39%
Total Expense	315,416.61	368,111.00	-48,402.82	
Net Ordinary Revenue	-25,759.14	-75,418.00		
Other Income/Expense				
Other Expense-SMC DPCC Loan	20,000.00			
Depreciation	0.00	0.00		
Reimbursed expenses from other sources	22,644.35	0.00		
Total Other Expense				
Net Other Revenue	22,644.35	0.00		
2016 Reserves	106,860.00	100,000.00		
Net Revenue	103,745.21	100,605.00		

DEED-RESTRICTED PROPERTY INVENTORY

	Current # of Deed Restricted Units Built		Other/Notes
	Owner Occ.	Rental/May Be Vacant	
TOWN of TELLURIDE			
Affordable Housing Units (AHU-mitigation)			
Owner-Occupied			
586 West Pacific Condos	1		
Ballard Condominiums	4	2	
Boomerang Lodge	1		
Boomerang Village	3		
Brown Homestead Condominiums	1		
Double Diamond Condominiums	2		
Eider Creek Condominiums	1		
Element 52 Condominiums	2	6	
Hillenmeyer Condominiums		1	
Lulu City Condominiums	1	1*	*Lock-off unit only-1 bdrm
Main Street Condo #4	1		
NeedleRock	1		
Outlaws at Prospect Creek	1		
Owl Meadows	1		
Red Brick Condominiums		1	
Telluride Main St. Condos	1		
Telluride Transfer Condo. S.E.C.	1		
West Pacific Campus Condominiums	1		
Wilkin Court	12	1	
Willows at Telluride, phase II	1		
Rentals			
AHU Town Rentals* (various locations)		13	
Creekside (under private management)		26	
Deed Restricted/Price-capped – Other	Owner Occ.	Rental	
Popcorn Alley (Cribs)	2		
Town Constructed	Owner Occ.	Rental	
Entrada	14		
Fino II Condominiums	2		
Gold Run	17		
Mendota	14		
Popcorn Alley (Cribs)	1		
Spruce House	8		
Telluride Family Housing (TFH)/Block 24	6		
White House Condominiums	9		
Town Constructed Units (Town/School design)	Owner Occ.	Rental	
Town of Telluride (1 TFH, 1 Mend, 2Ent)	3	1	
School District (1 Mendota,1 Ent,1 GR)	2	1	
Employee Dwelling Units (EDU)	Owner Occ.	Rental	
Various Locations	7	23	
THA Constructed	Owner Occ.	Rental	
Shandoka (25 Units are under EDU DR)		134	
Virginia Placer + Tiny Homes		21	
Boarding House - # of rooms		32 rms	
Sub-Total	121	231 + 32	
Total – Town of Telluride	352 + 32 rooms		
Units Lost due to foreclosure	3		2 Brown Homestead / 1 S. Oak

	Current # of Deed Restricted Units Built		Current # of Deed Restricted Units Approved	
	Owner Occ.	Rental	# Units Approved	Preliminary Approval
SAN MIGUEL COUNTY				
Accessory Dwelling Units (ADU)	Owner Occ.	Rental		
Aldasoro	1	11		
Elk Run		5		
Hastings Mesa		1		
Hillside of Telluride		1		
May Girl & Maryland Lode		1		
Raspberry Patch		2		
Ski Ranches		18		
Skyfield North		1		
Telluride Pines	1			
Wilson Mesa		5		
R-1 Deed Restriction (LUC) / County Cov	Owner Occ	Rental/Vacant	Undeveloped	
Aldasoro	18	1 built/vacant	5	
Lawson Hill	87		7	
Elk Meadows	14		1	
Live-Work Units				
Lot C			12	
Lot D – Hunter’s Gulch	1	3+3		
Lot E			6	
Lot F2			2	
Lot L			29	
The Pointe at Lawson Hill	11			
Ridgeview (comm/residential)		1		
Rio Vistas	2	4		
San Miguel Ridge	12			
Top of the Hill	2	1		
TSD units		4		
San Bernardo	23	2		
San Bernardo PUD – Employee Apartments		1	7	
Sunshine Valley (Lot P)	3	2 +1 bandit		13
Two Rivers (Lot P)	30			
Q lots	3		31	
Affordable Housing Covenant Guidelines	Owner Occ.	Rental		
Rio Vistas II	8			
Sub-Total	216	64	100	13
	Bandit units not included			
Total – County	280		113	
Units Lost due to Foreclosure (or * Deed in Lieu)	4*		*Rio Vistas II (2) Two Rivers (1) San Bern (1)	

MOUNTAIN VILLAGE	Current # of Deed Restricted Units Built		Current # of Deed Restricted Units Approved	
	Owner Occ.	Rental	# Units Approved	Preliminary Approval
Affordable Housing Restriction 2006-07	Owner Occ.	Rental		
Lot 20-Castellina	1			
Lot 109R/110 Mtn Village Hotel (73-76R)			1	
Lot 122			1	
Lot 123 R			1	
Lot 161CR [Sold in foreclosure 12/17/09]			5	No units built
Lot SS165ABR – Cassidy Ridge	3			
Lot 600A- Elkstone		1		
Coyote Court Deed Restriction	Owner Occ.	Rental		
OSP 22R2 - Coyote Court	10			
Employee Housing Restriction 1997-05	Owner Occ.	Rental		
OSP 35B - Big Billies		149		
1005R & 1001 - Village Court Apartments		222		
Lot 649R - Boulders	9	5	7	
Lot 639 - Fairway Four	15	8		
Lot 61R - Franz Klammer	1	3 +2 unknown		
Lot 160R - Mountain Village Firehouse		3		
Lot 640C - Northstar	3			
Lot 645 Parker Ridge	15	3		
Lot 725R1 - Pennington	1			
Lot 647 - Prospect Creek	10	4		
Lot 648AR - Prospect Plaza	2	3		
Lot 82R1 - See Forever	1	1		
Lot 640DR - Spring Creek	7	1 +1 unknown	4	
Lot 640BR - Timber View	2		6	
Lot 159R – Bear Creek Lodge (no info. on file)		2		
Lot 31 - La Tramontana	1	1		
Lot 158R1/158R2 - Tristant	1			
Lot 38R-50-51 – Hotel Madeline		10		
Lot 126R/152R [FC 2/27/09] New PUD 7/13			18 dorms + 8 apts	
LOT 165(Unit 23)-Cortina	1	1		
Lot 17-Emp Apt				1-density bank
Lot 28- Lumiere	1			
Lot 71R			1	
Lot 30			2 dorm	
Lot 640A – Mountain View Apartments		30		
Lot 644-			54	
Sub-Totals	84	450	83units/ 20 dorms	1
Total-Mountain Village	534		104	
Units Lost due to Other Circumstance				
Telluride Apartments- Condemned	Rehabbed units			
La Chamonix-re-zoned	1			
Units Lost due to Foreclosure	3		ProsPlaz2-3D/SprCrk 6/Bldrs15	
Units Lost due to Foreclosure w/ Zoning change	6		PrkRdg(702/503/803)/ProsPlaz2-3B/See4everE3/FF5	
Total TMV DR Units Lost	10			
Regional Total of Units Lost	17			
REGIONAL TOTAL –Does not include lost units	1166 + 32 rooms		217	



PLANNING & DEVELOPMENT SERVICE
PLANNING DIVISION
455 Mountain Village Blvd.
Mountain Village, CO 81435
(970) 728-1392

Agenda Item #19

TO: Town Council
FROM: Dave Bangert, Senior Planner/Town Forester
FOR: Town Council Public Hearing on June 14, 2018
DATE: June 6, 2018
RE: Work Session to discuss potential regulations regarding the treatment of dead, diseased and beetle infested trees and an update on the MV Defensible Space Incentive Program.

At the April 2018 Town Council meeting the Staff was directed to agendize a work session to discuss options on how best to deal with dead and diseased trees as well as defensible space. Below is background and a recommendation on how to proceed.

Background

In August 2010, Town Council conducted a public hearing on a since passed ordinance with direction from Town Council to only apply the fire mitigation to new construction activities. Staff revised the regulations to require a wildfire mitigation plan for only the following types of development:

12-301-1 All new Building construction.

12-301-2 Additions that increase a building's habitable floor area or number of stories that have a valuation of \$50,000 or greater.

12-301-2 Any Alteration of the landscaping of a property that has a valuation of \$50,000 or more, including but not limited to the addition of decks, patios, walkways and water features.

During the initial discussions with Council, Staff discussed retroactively requiring existing homes to create defensible space and the need to address the abundance of dead trees in Mountain Village. At that time Council did not want to require existing homes to create defensible space as part of the changes to Article 12 of the old LOU. Staff also discussed at that time, a potential ordinance to require home/lot owners to remove dead trees on their property as the community

of Vail had done in 2007. For many reasons, including the costs burden this would put on property owners, this idea was not embraced by Council at that time.

Forest health in Mountain Village is threatened by many issues including sudden aspen decline, spruce budworm, balsam fir bark beetle/armillaria root disease, Douglas fir bark beetle and spruce bark beetle. These threats will continue in to the future and epidemic Douglas fir beetle populations are already having an impact from Sawpit up to Illium in the San Miguel Canyon. Spruce beetle populations in the Mountain Village area remain at endemic levels but epidemic levels and mass spruce mortality are evident around Silverton and the Molas Pass area. These beetle populations may spread to the west and impact the Telluride/Mountain Village area in the next few years. If this occurs it will impact our forests greatly and the Town may need to take further regulatory measures to insure the safety of our residents and their properties.

Update on MV Defensible Space Incentive Program

In 2016 Mountain Village launched Defensible Space Incentive Program to encourage homeowners to create defensible space around their properties. In 2016 we had 25 defensible space projects completed with \$68,600 rebated to home owners. In 2017 those numbers dropped to 7 completed projects and \$20,500 rebated to home owners. So far in 2018, 7 defensible space projects have been marked and are awaiting completion. With smoke in the air from 2 regional wildfires, home owners coming in to Town this summer may be more willing to safe guard their properties by creating defensible space.

The town is launching a community outreach marketing campaign beginning next week to message the community on our Wildfire Mitigation and Defensible Space Program. The Wildfire Mitigation Program outreach efforts will include messaging placement in print advertising for our local newspapers, Village Center poster kiosk placement (24" x 26"), targeted email marketing (eblasts), and social media posts to all town channels.

STAFF RECOMMENDATION

I have attached an ordinance Vail enacted to handle these types of situations. Its main components are as follows:

Inspection for Bark Beetles and Wildfire Fuels.

Notice of Violation.

Abatement Order.

Permit for Removal of Beetle Infested Trees and Wildfire Fuels.

Unlawful Acts.

Violation; Penalty

Staff recommends the Council review the attached Vail ordinance, forest stand map and land ownership map and discuss potential regulations for mandatory tree removal if Mountain Village is hard hit by bark beetles causing mass tree mortality.

**ORDINANCE NO. 23
Series of 2007**

**AN ORDINANCE DELETING SECTION 5-1-5, VAIL TOWN
CODE, REGARDING ABATEMENT OF THE MOUNTAIN PINE
BEETLE; AMENDING TITLE 5 VAIL TOWN CODE WITH THE
ADDITION OF CHAPTER 10 “ABATEMENT OF THE
MOUNTAIN PINE BEETLE AND WILDFIRE FUELS
REDUCTION”; AND SETTING FORTH DETAILS IN REGARD
THERETO.**

WHEREAS, the Town of Vail (the “Town”), in the County of Eagle and State of Colorado, is a home rule municipal corporation duly organized and existing under laws of the State of Colorado and the Town Charter (the “Charter”); and

WHEREAS, the members of the Town Council of the Town of Vail (the “Council”) have been duly elected and qualified; and

WHEREAS, within the State of Colorado and within the Town there exists a growing mountain pine beetle epidemic which threatens health, safety and welfare of our state and our community; and

WHEREAS, the presence of the mountain pine beetle and beetle infested trees within the Town presents a real and substantial risk to the public health, safety and welfare, including the increased risk of rapidly spreading wildfire. In addition, the presence of dead or substantially dead trees, regardless of the cause, also presents an increased risk and danger of rapidly spreading wildfire; and

WHEREAS, certain text amendments are necessary to the Town Code, as they relate to the abatement of the mountain pine beetle, dead or substantially dead trees and other wildfire fuels to protect the health, safety and welfare of the Town and its inhabitants; and

WHEREAS, the inspection provisions contained in this Chapter are necessary in the interest of public safety within the meaning of Rule 241(b)(2) of the Colorado Municipal Court Rules of Procedure.

NOW, THEREFORE, BE IT ORDAINED BY THE TOWN COUNCIL OF THE TOWN OF VAIL, COLORADO THAT:

Section 1. Section 5-1-5 of the Municipal Code of the Town of Vail is hereby deleted in its entirety.

Section 2. Title 5 of the Municipal Code of the Town of Vail is hereby amended by the addition of Chapter 10 to read as follows:

CHAPTER 10

ABATEMENT OF THE MOUNTAIN PINE BEETLE AND WILDFIRE FUELS REDUCTION

Section:

5-10-1: Definitions

5-10-2: Duty of Landowner and Occupant to Permit Inspection

5-10-3: Inspection for Mountain Pine Beetle and Wildfire Fuels

5-10-4: Notice of Violation

5-10-5: Abatement Order

5-10-6: Permit for Removal of Beetle Infested Trees and Wildfire Fuels

5-10-7: Unlawful Acts

5-10-8: Violation; Penalty

5-10-1: DEFINITIONS: For purpose of this Chapter 10, the following words shall have the following meanings, unless the context clearly requires otherwise:

BEETLE INFESTED TREE: A tree, alive or dead, which is or has been infested with the Mountain Pine Beetle (*Dendroctonus ponderosae*).

DIRECTOR: The Town of Vail Director of Public Works, or his designee.

MOUNTAIN PINE BEETLE: The species *Dendroctonus ponderosae*.

OCCUPANT: Any person in physical possession of any lot, tract or parcel of real property located within the Town of Vail limits who are not the owner of such property. For the purposes of this Chapter 10, "occupant" does not include the owner of an easement or right-of-way across property.

OWNER OR LANDOWNER: Any person who owns any lot, tract or parcel of real property located within the corporate limits of the Town of Vail.

PROPERTY: Any lot, tract or parcel of real property located within the corporate limits of the Town of Vail.

WILDFIRE FUELS: (i) A tree, alive or dead, which is or has been a beetle infested tree; (ii) Any species or variety of tree which is dead or substantially dead and determined to be a wildfire fuel hazard by the Town of Vail Director of Public Works, or his designee.

5-10-2: DUTIES OF LANDOWNER AND OCCUPANT TO PERMIT INSPECTION: An owner or occupant whose property contains one or more beetle infested trees or any fire fuels shall allow the Director to enter such property for the purpose of immediate inspection of the trees located upon such property when at least one of the following events has occurred:

A. The owner or occupant has requested the inspection; or

- B. A neighboring landowner or occupant has reported a suspected beetle infested trees or other wildfire fuels and requested an inspection; or
- C. The Director has made a visual observation from a public right-of-way or area and has reason to believe that beetle infested trees or other wildfire fuels exist on the property of the owner or occupant.

5-10-3: INSPECTION FOR MOUNTAIN PINE BEETLE AND WILDFIRE FUELS:

- A. Subject to the requirements and limitations of this Chapter, The Director shall have the right to enter upon any property, whether public or private, during reasonable hours for the purpose of inspecting for the existence of a beetle infested tree or any other wildfire fuels when at least one of the three events described in section 5-10-2 has occurred. However, no agent or employee of the Town shall enter upon any property to inspect for a beetle infested tree or other wildfire fuels without the permission of the owner or occupant, or without an inspection warrant issued pursuant to this Chapter.
- B. If verbal permission to inspect the property from the affected owner or occupant is not obtained, the Town shall send written notice to the landowner and any occupant of the property advising that the Director desires to inspect the property for a beetle infested tree and/or other wildfire fuels. The notice shall be sent by certified mail. The notice may be sent to the landowner at the address to which tax notices are sent according to the records of the Eagle County Treasurer, and to the occupant at the property address. Alternatively, the Director may personally serve such notice upon the affected owner or occupant. Where possible, inspections shall be scheduled and conducted with the concurrence of the owner or occupant.
- C. If permission to enter upon and inspect the property is not obtained within ten (10) days after the notice described in subsection B of this section has been received, or within ten (10) days of the date of service if the notice was personally served, the Director may request that an inspection warrant be issued by the Municipal Court. The Municipal Court Judge shall issue an inspection warrant upon presentation by the Director of an affidavit satisfying the requirements of Rule 241(b)(2) of the Colorado Municipal Court Rules of Procedure.
- D. In the case of an emergency involving imminent danger to the public health, safety or welfare, the Director may enter upon any property to conduct an emergency inspection without a warrant and without complying with the requirements of this section.

5-10-4: NOTICE OF VIOLATION:

- A. If the Director determines that property contains one or more beetle infested trees or other wildfire fuels, the Director shall notice the owner and any occupant of the property. Such notice shall be given either by certified mail or personal delivery.
- B. The notice shall:
 1. advise the owner and/or the occupant that the property contains one or more trees infested with mountain pine beetle and/or other wildfire fuels;

2. advise the owner and/ or the occupant of Town approved methods for the removal or destruction of beetle infested trees and/or other fire fuels; and
3. advise the owner and/or the occupant that all trees infested with mountain pine beetle and/or other wildfire fuels must be removed within a minimum of thirty (30) days following receipt of the notice, or that an acceptable plan and schedule for removal of the beetle infested trees or other wildfire fuels must be submitted to the Director within such thirty (30) day period.

- C. If the owner or occupant disputes that the property contains one or more beetle infested trees or other wildfire fuels as determined by the Director, the owner or occupant shall notify the Director of such dispute within thirty (30) days of receipt of the Director's notice. If a timely notice of dispute is given, the Town shall not file an application for an abatement order until the Director has met with the disputing party in an effort to resolve the dispute. If the Director meets with disputing party and is unable to resolve the dispute, the Town may file an application for an abatement order pursuant to section 5-10-5 below.

5-10-5: ABATEMENT ORDER:

- A. In the event the owner and/or the occupant fails to comply with the Director's notice as described in Section 5-10-4 by removing the beetle infested trees and/or other wildfire fuels or by submitting an acceptable schedule for such removal within the applicable thirty (30) day period, the Town has the authority to provide for and to complete the removal by obtaining and acting on an abatement order.
- B. Upon the expiration of the notice period, or at any time thereafter if the required action has not taken place, the Town may apply to the Municipal Court for an abatement order.
- C. An application for an abatement order shall be accompanied by an affidavit affirming that:
1. The Director has determined that the subject property has one or more beetle infested trees or other wildfire fuels;
 2. The Director has complied with the notice requirements of Section 5-10-4; and
 3. The owner or occupant has failed to either remove the beetle infested trees or other wildfire fuels, or has failed to submit an acceptable plan and schedule such removal within the required time.
- D. The Town shall give notice to the owner and any occupant of the property of its application for an abatement order either by certified mail or by personal service of the notice. The notice of application for an abatement order shall include a copy of the Town's application and its affidavit in support thereof, as well as the date, time, and place at which the Town will appear before the Municipal Court to request entry of the abatement order.
- E. At the stated time, date and place, the Municipal Court judge shall review the Town's application for an abatement order, the affidavit, any statement of the Town offered in support thereof, as well as any statement and evidence presented by the owner or occupant, if present.
- F. The Municipal Court Judge is authorized to enter an order permitting the Town to enter

upon the subject property, remove beetle infested trees or other wildfire fuels and to recover its costs as provided in subsection I of this section, if the Municipal Court Judge finds that:

1. The subject property has one or more beetle infested trees or other wildfire fuels;
2. The Director has complied the notice requirements of Section 5-10-4; and
3. The owner or occupant has failed to either remove the beetle infested trees or other wildfire fuels, or has failed to submit an acceptable plan and schedule such removal within the required time.

- G. An owner is responsible under this Chapter for any beetle infested trees permitted to remain on the owner's property by an occupant after the Director has given notice of a violation pursuant to Section 5-10-4.
- H. In the case of an emergency involving imminent danger to public health, safety or welfare, the Town may authorize the immediate removal of any beetle infested trees or other wildfire fuels without notice or an abatement order.
- I. The owner shall be assessed twice the whole cost of removal of the beetle infested trees or other wildfire fuels from the subject property, including administrative fees. If all costs and charges incurred by the Town are not paid within thirty (30) days from the date of the assessment, the unpaid costs shall be certified to the Eagle County Treasurer for collection in the same manner as real property taxes.

5-10-6: PERMIT FOR REMOVAL OF BEETLE INFESTED TREES AND WILDFIRE FUELS: A design review application for a permit must be filed with the Town of Vail Community Development Department by any owner or occupant desiring to remove one or more beetle infested trees or other wildfire fuels from his or her property. There shall be no application fee for the permit. The application shall contain a written narrative describing the type, size, quantity and general location of the beetle infested trees and/or wildfire fuels proposed to be removed. The Director may perform a site visit prior to taking any action on permit application.

5-10-7: UNLAWFUL ACTS:

- A. It shall be unlawful for any owner to fail or refuse to remove all beetle infested trees or other wildfire fuels from their property within the time period provided for in a notice of violation sent by the Director pursuant to section 5-10-4 of this section.
- B. It shall be unlawful for an owner or occupant to deny the Director access to their property if the Director presents an inspection warrant or abatement order issued pursuant to this Chapter 10.
- C. It shall be unlawful for any person to sell, expose for sale, offer for sale, transfer, give away or offer to give away any tree which is, at the time of the transfer, infested by the mountain pine beetle.

5-10-8: VIOLATION; PENALTY: Any person convicted of violating any of the provisions of this Chapter shall be punished as provided in Section 1-4-1 of this Code; provided, that each separate act in violation of the provisions of this Chapter, or each and every day or portion thereof during which any separate act in violation of this Chapter is committed, continued, or permitted, shall be deemed a separate offense.

Section 3. If any part, section, subsection, sentence, clause or phrase of this ordinance is for any reason held to be invalid, such decision shall not effect the validity of the remaining portions of this ordinance; and the Town Council hereby declares it would have passed this ordinance, and each part, section, subsection, sentence, clause or phrase thereof, regardless of the fact that any one or more parts, sections, subsections, sentences, clauses or phrases be declared invalid.

Section 4. The Town Council hereby finds, determines and declares that this ordinance is necessary and proper for the health, safety and welfare of the Town of Vail and the inhabitants thereof.

Section 5. The amendment of any provision of the Town Code as provided in this ordinance shall not affect any right which has accrued, any duty imposed, any violation that occurred prior to the effective date hereof, any prosecution commenced, nor any other action or proceeding as commenced under or by virtue of the provision amended. The amendment of any provision hereby shall not revive any provision or any ordinance previously repealed or superseded unless expressly stated herein.

Section 6. All bylaws, orders, resolutions and ordinances, or parts thereof, inconsistent herewith are repealed to the extent only of such inconsistency. This repealer shall not be construed to revise any bylaw, order, resolution or ordinance, or part thereof, theretofore repealed.

INTRODUCED, READ ON FIRST READING, APPROVED, AND ORDERED PUBLISHED ONCE IN FULL ON FIRST READING this 16th day of October, 2007, and a public hearing for second reading of this Ordinance set for the 6th day of November, 2007, in the Council Chambers of the Vail Municipal Building, Vail, Colorado.

Rodney E. Slifer, Town Mayor

Attest:

Lorelei Donaldson, Town Clerk

READ AND APPROVED ON SECOND READING AND ORDERED PUBLISHED IN FULL this 6th day of November, 2007.

Rodney E. Slifer, Mayor

ATTEST:

Lorelei Donaldson, Town Clerk

Figure 2

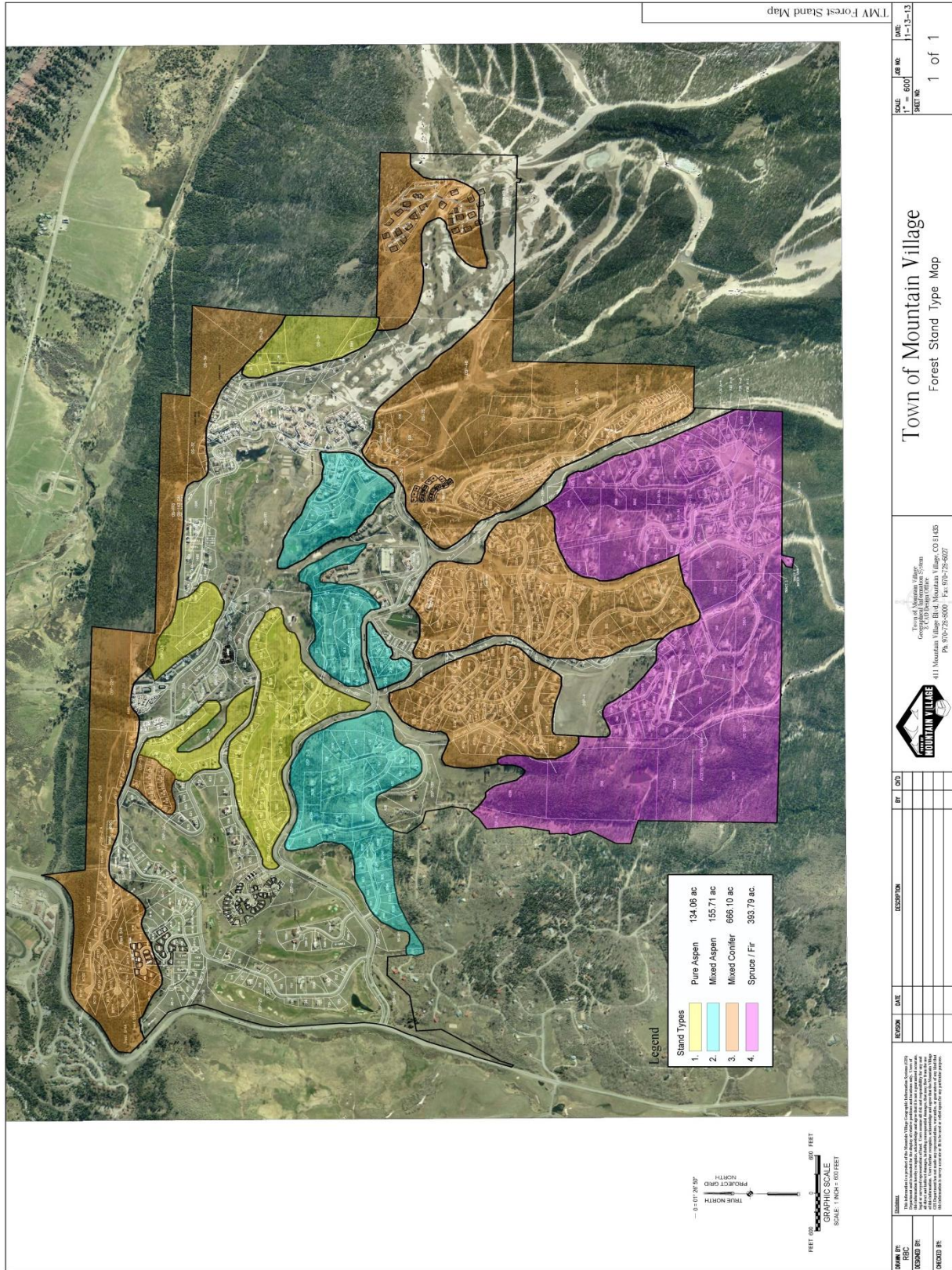
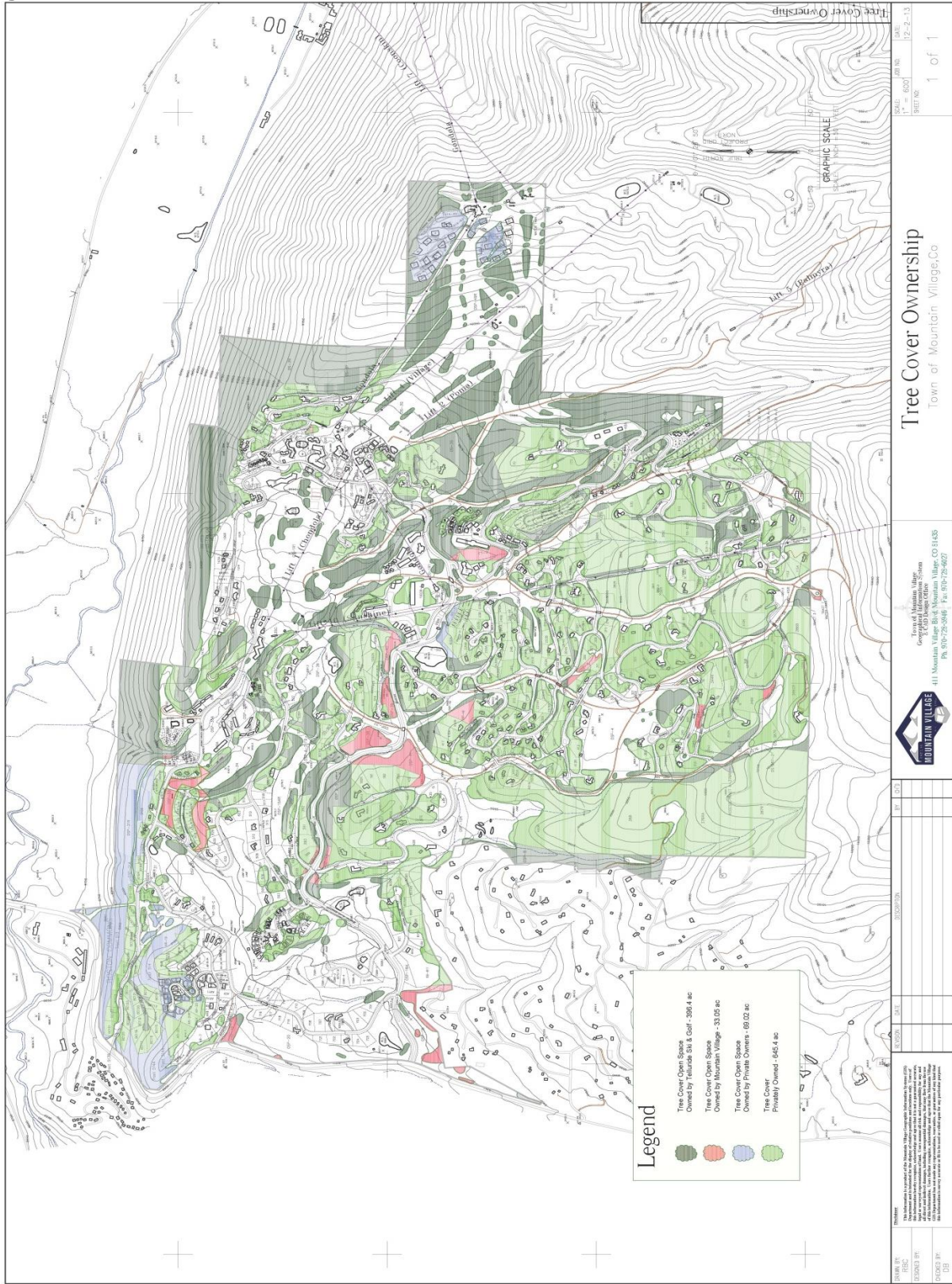


Figure 1





**TOWN OF MOUNTAIN VILLAGE
TOWN MANAGER
CURRENT ISSUES AND STATUS REPORT
JUNE 2018**

1. Great Services Award Program

▪ **Great Services Award – April**

Nick Allen, VCA Maintenance – Nick goes beyond his work duties with a smile and a positive attitude. VCA staff and residents, even the most difficult, praise Nick and the efforts he puts into making VCA a wonderful place to live. He gives 100% towards his workmanship even when performing the toughest duties. His honesty and morals are appreciated - **WINNER FOR MAY**

▪ Participated in our annual employee appreciation picnic where the following service awards were also presented:

SERVICE AWARDS

Five Year Awards

- Zack Jacobs, gondola maintenance
- Corrie McMills, HR
- JD Wise, plazas
- Jason Marchand, community services

Ten Year Awards

- Jory Hasler, cable
- Sheri Mahoney, finance
- Larry Forsythe, gondola maintenance
- Jackie Kennefick, admin services

Fifteen Year Awards

- George Davis, building maintenance
- Sue Kunz, HR

Twenty-five Year Awards

- Jamie Haats, gondola maintenance
- Jim Loebe, Transit, Recreation, & Parking

Other employee nominated awards will be included in next month's report as they were not yet announced at the time of the packet deadline.

2. IT RFP Status

- Contract was awarded to Executech, lowest bidder, and work is underway. Final report should coincide with the budget process for 2019

3. Intergovernmental Agreements

- The Intergovernmental Agreement (“IGA”) with San Miguel Regional Housing Authority (“SMRHA”) will automatically renew annually unless the Town provides notice 120 days prior to the year-end that we wish to terminate. SMRHA has provided very good service to all three governmental agencies and I recommend no action, allowing the agreement to automatically renew
- The IGA with Marketing Telluride Inc. (“MTI”) also known as the Telluride Tourism Board (“TTB”) will automatically renew unless Town of Mountain Village, San Miguel County Commissioners and Town of Telluride jointly deliver written notice to MTI not less than 120 days prior the year end. TTB is providing excellent service and value to all three governmental agencies and I recommend no action, allowing the agreement to automatically renew

4. Miscellaneous

- Attended the Town of Telluride Council meeting to support the TRWWTP Master Plan Update and Financial Update
- Attended a Special Town Council Meeting for purposes of extending the Standstill Agreement with Northlight Trust I
- Met with the USFS to discuss ongoing goals and priorities for the Recreation Ranger program
- Attended the Community that Cares Youth Presentation of options for youth center locations both short and long term
- Attended monthly SMRHA meeting
- Attended the Special Joint Council meeting with Telluride and Mountain Village on the TRWWTP Financial Analysis

TOWN OF MOUNTAIN VILLAGE
Town Council Special Meeting
June 14, 2018
8:30 a.m.

During Mountain Village government meetings and forums, there will be an opportunity for the public to speak. If you would like to address the board(s), we ask that you approach the podium, state your name and affiliation, and speak into the microphone. Meetings are filmed and archived and the audio is recorded, so it is necessary to speak loud and clear for the listening audience. If you provide your email address below, we will add you to our distribution list ensuring you will receive timely and important news and information about the Town of Mountain Village. Thank you for your cooperation.

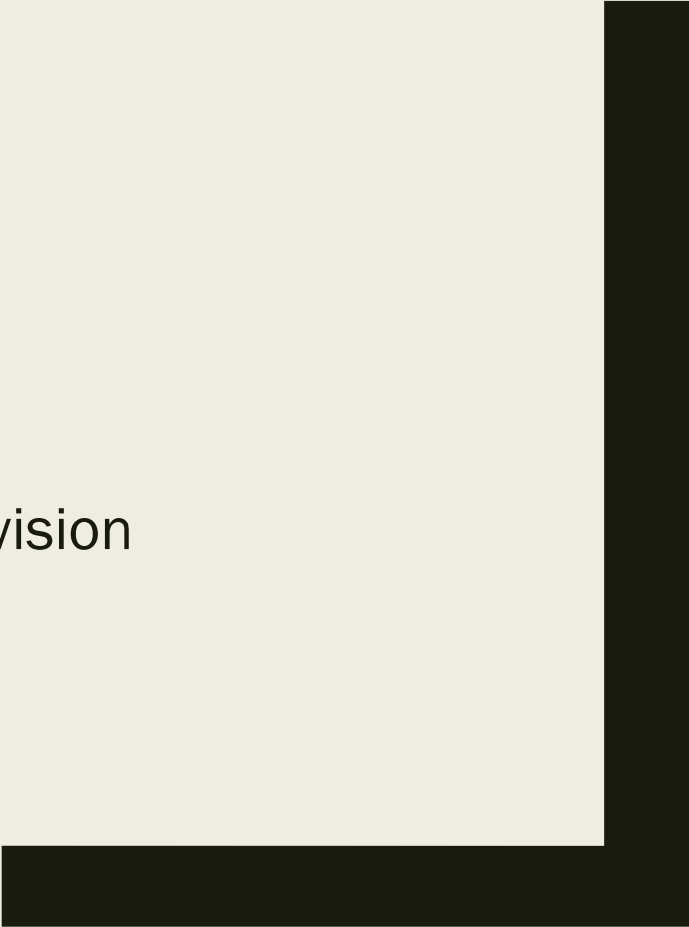
NAME: (PLEASE PRINT!!)

Luila Benitez	EMAIL:
Patrick Berry	EMAIL:
Kim Montgomery	EMAIL:
David Reed	EMAIL:
Jim Mahoney	EMAIL:
Sarah Abbott	EMAIL:
Dan Jansen	EMAIL:
Jacq Gilbride	EMAIL:
Natalie Binder	EMAIL:
Jacqie Kennefick	EMAIL:
Susan Johnston	EMAIL:
Christina Lambert	EMAIL:
Tim Johnson	EMAIL:
S. Cheavens / Tell. Daily Planet	EMAIL:
Bill Kight	EMAIL:
Leslie Browning	EMAIL: lesliemann11@gmail
Chns Broady	EMAIL:
Chris Hawkins	EMAIL:
Nicole Pieterse	EMAIL: nicole.rplaw@gmail.com
Jim Bascabel TPD	EMAIL:
Carson Taylor	EMAIL:
NoAH SHEEDY	EMAIL:
Anten Bender	EMAIL:
Jordan Dimick	EMAIL: Jordan.D@Sgm-inc.com
Meghann McCormick	EMAIL: at tellundeartandarchitecture@gmail.com
Matt Skirrow	EMAIL:
Jolana Vanu	on file



151R

Density Transfer, Rezone, Major Subdivision



Contents

- Administrative Overview
- Project Context
- General Easements
- Utilities
- Questions

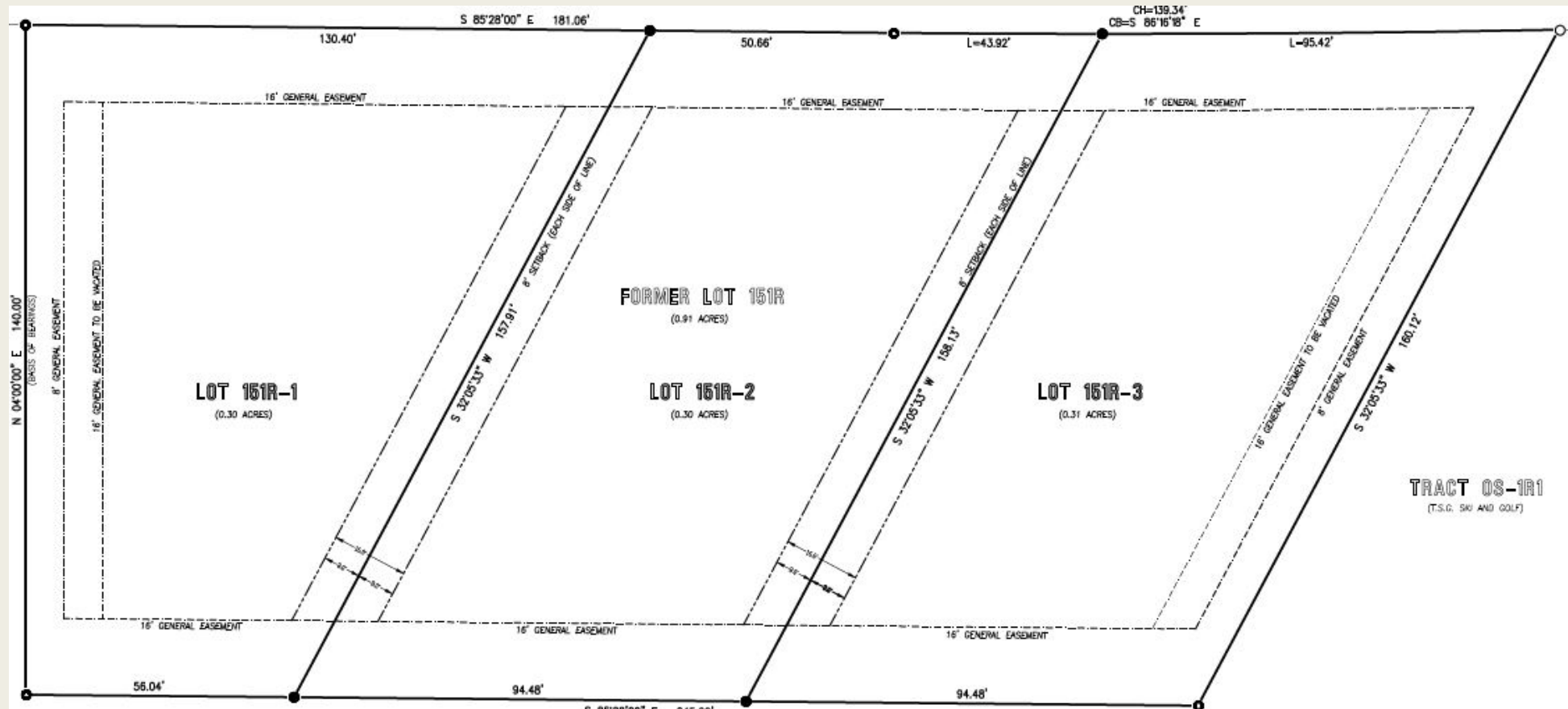
Administrative Overview

- Rezone, Density movement
- Major Subdivision

Project Context



General Easements



17.3.14 GENERAL EASEMENTS SETBACKS

- A. The majority of all lots outside the Village Center Zone District are burdened by a sixteen (16) foot general easement creating a building setback sixteen (16) feet around the perimeter of the lot.
- B. For lots outside the Village Center Zone District where a general easement does not exist and lots where the general easement has been vacated, the review authority may require the establishment of a building setback as determined by the DRB at the time of review of a development application.
 - 1. The review authority may not require a setback for such lots if the Town has established other design allowances by a recorded development agreement or other legally binding approval that establishes a different general easement setback or other setback.
- C. All general easement setbacks or other setbacks shall be maintained in a natural, undisturbed state to provide buffering to surrounding land uses and to maintain the ability to conduct any of the general easement allowed uses.
- D. All above- and below-grade structures or structural components (soil nailing, etc.), earth disturbance, or ground level site development such as walks, hardscape, terraces and patios shall be located outside of the general easement setback or other setbacks on each lot within the allowable building area of a lot.
- E. The following development activities are permitted in the general easement setback or other setbacks subject to the applicable review process and Design Regulations:
 - 1. Review authority approved accessways for direct access, including driveways, walkways, and ski trails and ski lifts for ski area access.
 - a. Accessway impacts to the general easement shall be minimized to the extent practical, such as a perpendicular crossing of the easement setback area.
 - b. Accessways shall not exceed the minimum Town standards for construction, such as the minimum width.
 - 2. Utilities;
 - a. To the extent practical, all utilities shall follow a driveway alignment.
 - 3. Address monuments;
 - 4. Natural landscaping without any man-made materials or hardscape;
 - 5. Fire mitigation and forestry management without substantial earthwork;
 - 6. Construction staging provided:
 - a. The area proposed for such staging is devoid of naturally occurring trees or other naturally occurring vegetation; or
 - b. The DRB is approving disturbance in the general easement for another proposed improvement such as a driveway, utility cut, or skier access, and the area can be used for staging until the approved improvement is constructed; and
 - 7. Other uses as provided for in the definition of general easement.
- F. The DRB may waive the general easement setback or other setbacks and allow for prohibited activities provided:

1. The applicant has demonstrated that avoiding grading and disturbance in the general easement setback would create a hardship, and there is not a practicable alternative that allows for reasonable use of the lot;
 2. The disturbance in the general easement setback is due to natural features of the site, such as steep slopes, wetlands and streams;
 3. No unreasonable negative impacts result to the surrounding properties;
 4. The general easement setback or other setback will be revegetated and landscaped in a natural state;
 5. The Public Works Department has approved the permanent above-grade and below-grade improvements;
 6. The applicant will enter into an encroachment agreement with the Town with the form and substance prescribed by the Town; and
 7. Encroachments into the general easement setback or other setbacks are mitigated by appropriate landscaping, buffering and other measures directly related to mitigating the encroachment impacts.
- G. Planning Division staff is authorized to review and approve soil disturbance, grading and structures in the general easement setback provided it finds:
1. Such activities were approved by the Town as a part of a prior approval or were found to lawfully exist;
 2. The owner of the lot is simply trying to maintain or improve prior approved or lawful encroachments into the general easement setback; and/or
 3. The lot owner enters into a revocable encroachment agreement with the Town if one does not exist.
- H. The DRB reserves the right, at the time of Design Review Process, to impose setbacks up to twenty (20) feet for tennis courts, swimming pools, hot tubs and other areas of active use. Noise for such uses shall be buffered from adjacent properties.
- I. All buildings will be required to maintain or provide for the required Building Codes' setbacks.
- J. The DRB reserves the right, at the time of Design Review Process, to impose greater setback requirements of up to ten (10) additional feet (i.e., a maximum of twenty-six (26) feet) for the protection of trees and natural rock outcroppings and other significant natural and environmentally sensitive features that are located in the general easement setback or other setbacks and to safeguard surrounding significant natural and environmentally sensitive features from the impacts of construction. If construction outside of the general easement or other setbacks will not impact trees or other significant natural and environmentally sensitive features in the area of the general easement setback or other setbacks, disturbance may be permitted by the DRB provided the disturbed area is re-landscaped.
- K. When a proposed development is approved that is five (5) feet or less from the general easement setback, other setback or a lot line, the review authority approval shall include a condition that a monumented land survey shall be prepared by a Colorado public land surveyor to ensure there are no above-grade or below-grade encroachments into the general easement setback.
- L. One function of the general easement is to provide for skier access to the ski area.
1. A lot owner may seek skier access to the ski area by the general easement through an intervening lot(s) only if the Town Council approves a class 5 development application for such request, and provided the following criteria are determined by the Council to be met:
 - a. No disturbance or snow grooming activity is proposed or shall occur in the

general easement on the intervening lot(s) without the permission of the intervening lot owner(s).

- b. There is adequate buffering and setback between the general easement and any existing home(s) on the intervening lot(s).
- c. The owner(s) of the intervening lots are notified of the Council's consideration of the class 5 development application following the public hearing noticing requirements' mailing notice details, with at least 30 days notice provided prior to the Town Council meeting at which the development application will be considered.
- d. The location of the access to the ski area is approved ski resort operator if there is any disturbance or snow grooming activity creating a formal entry into the ski area.

M. The review authority may not apply a general easement or setback to a subdivision, lot or development if the Town has previously established a general easement for the whole subdivision, or different setbacks, easements or other restrictions that limit development to a certain area of a lot.

17.3.15 HOTBED DEVELOPMENT AND CONDOMINIUM-HOTEL REGULATIONS

- A.** Any rezoning, subdivision, density transfer, PUD (SPUD or MPUD) or PUD amendment process and related Design Review Process development applications shall be in general conformance with the Comprehensive Plan's hotbed policies and the hotbed policies of the CDC, including the Condominium-hotel Regulations.
- B.** Any development application on a site identified as a flag hotel site in a subarea plan's development table shall include a rezoning development application to rezone such site to the PUD Zone District to ensure the provision of hotbed development as envisioned in the Comprehensive Plan pursuant to the Condominium-hotel Regulations and to allow variations to the requirements of the CDC to strive to achieve the density and building heights listed in each subarea plan's development table consistent with the policies set forth in the CDC.
- C.** Other lots not identified by the Comprehensive Plan for a flag hotel may submit a rezoning development application following the class 4 development application process to apply the Condominium-hotel Regulations to a lot as an overlay zoning requirement upon a property.
 - 1.** The development application for a rezoning shall include the appropriate homeowners association consent and a copy of resolution of the homeowners association consenting to such application.
- D.** The Condominium-hotel Regulations are set forth in the supplementary regulation of the CDC and are considered a part of these Zoning and Land Use Regulations.

17.3.16 SITE MAINTENANCE

- A.** A lot owner, or owner of improvements on a lot, shall maintain that lot or improvements in a clean, safe and orderly condition and in compliance with any Town approvals granted under this CDC or the prior land use regulations. If the lot or improvements owner fails to perform any acts of maintenance or repair, the owner will be in non-compliance with this CDC and subject to the enforcement provisions contained herein.
- B.** Neither the Town nor any of its designees or employees or agents shall be liable for any incidental or consequential damages for failure to inspect any lot or improvements or portion thereof or to repair or maintain the same.

Town of Mountain Village

Outlook on Mountain Village's Physical
and Legal Water Supply Availability in 2018

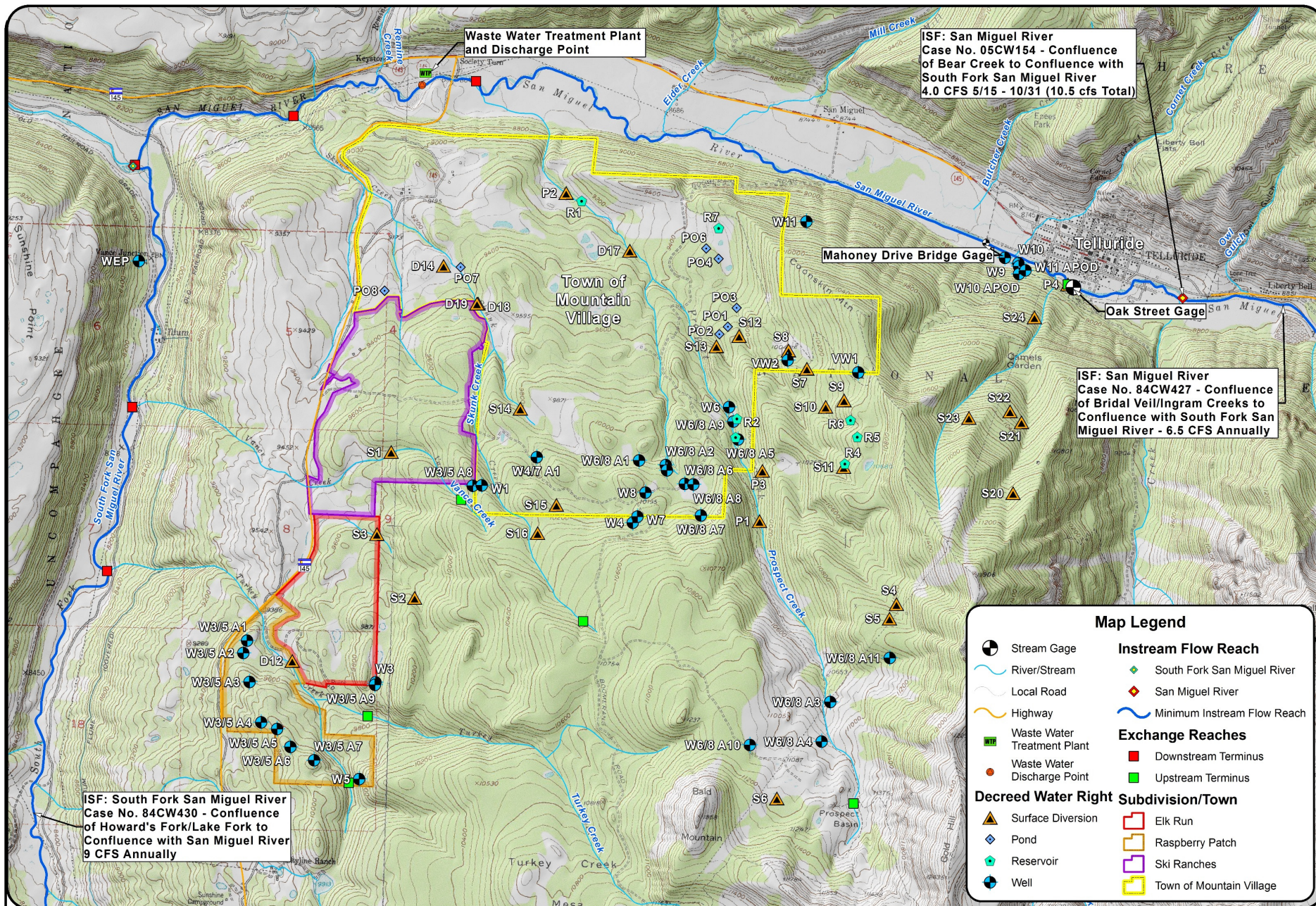
Jordan Dimick, PE

Introduction

- Overview of TMV water supplies
- Historical water system operations
- TMV's water rights and relative seniority
- TMV's sources of augmentation supply
- Water conservation and long-term planning

Overview of TMV Water Supplies

- All potable water is from wells – both valley floor and on-mountain
- Valley floor wells are large producers but subject to curtailment if flow in the San Miguel River drops below the CWCB ISF
- The golf course supply is diverted from streams
- Snowmaking supply is diverted from streams and valley floor wells



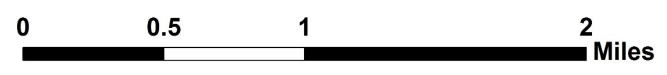
Map Legend

	Stream Gauge	Instream Flow Reach		South Fork San Miguel River
	River/Stream		San Miguel River	
	Local Road		Minimum Instream Flow Reach	
	Highway	Exchange Reaches		Downstream Terminus
	Waste Water Treatment Plant		Upstream Terminus	
	Waste Water Discharge Point	Decreed Water Right Subdivision/Town		Surface Diversion
	Well		Elk Run	
	Pond		Raspberry Patch	
	Reservoir		Ski Ranches	
	Well		Town of Mountain Village	

SGM
 555 RiverGate Ln, Suite B4-82
 Durango, CO 81301
 970.385.2340
 www.sgm-inc.com

TMV/TSG Water Rights

Date: 6/8/2018 Scale: 1:18,000 Map by: RZM
 Data Sources: USGS, CDOT, CDOW, CDSS, TMV/TSG, 90CW112 and 10CW141
 The information displayed above is intended for general planning purposes. Refer to legal documentation/data sources for descriptions/locations.



Historical Water System Operations

- Operate the San Miguel valley floor wells in spring and early summer, then pump on-mountain wells during the call
- On-mountain wells have historically met demands and have declined but not severely or for an extended period
 - An extended drought could change this if recharge declines significantly
- On-mountain wells can continue to pump during a river call if depletions are replaced with augmentation supplies

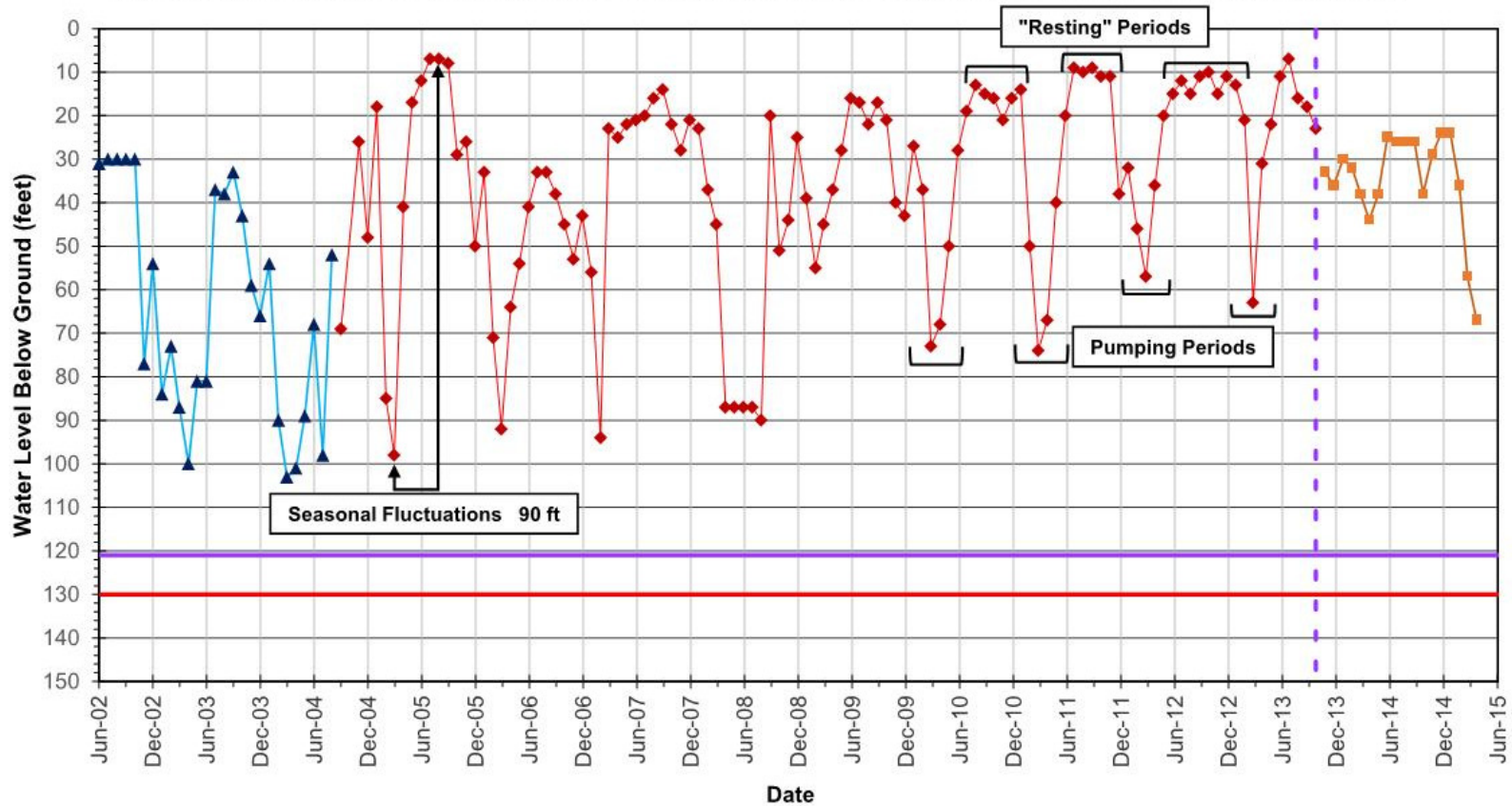
Historical Water System Operations

Depth = 140 ft
 Pump Depth = 130 ft
 Probe depth = 121 ft
 Discharge ≈ 18 gpm (Jan - May)

Water Levels - Well 6 Town of Mountain Village

▲ Sounder Reading ◆ Probe Reading ■ New Probe Reading — Pump Depth - - - New Probe — Probe Depth

*Some apparent changes in water level may be due to change in probe or pump depth and not due to a change in aquifer condition.



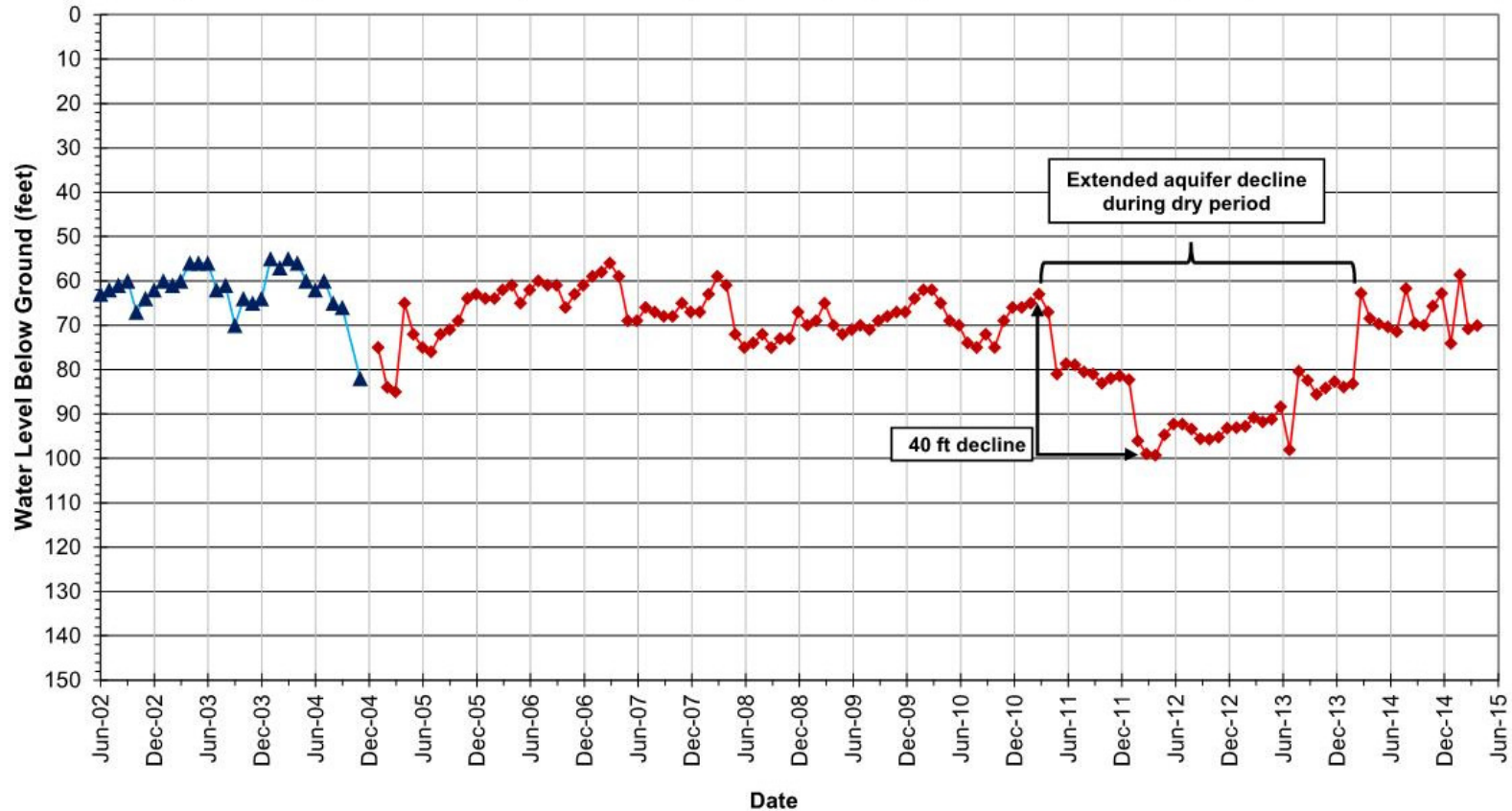
Historical Water System Operations

Depth = 225 ft
 Pump Depth = 220 ft
 Probe depth = 210 ft
 Discharge ≈ 58 gpm
 (16-18 hrs/day)

Water Levels - Well 8 Town of Mountain Village

● Probe Reading ▲ Sounder Reading — Pump Depth — Probe Depth

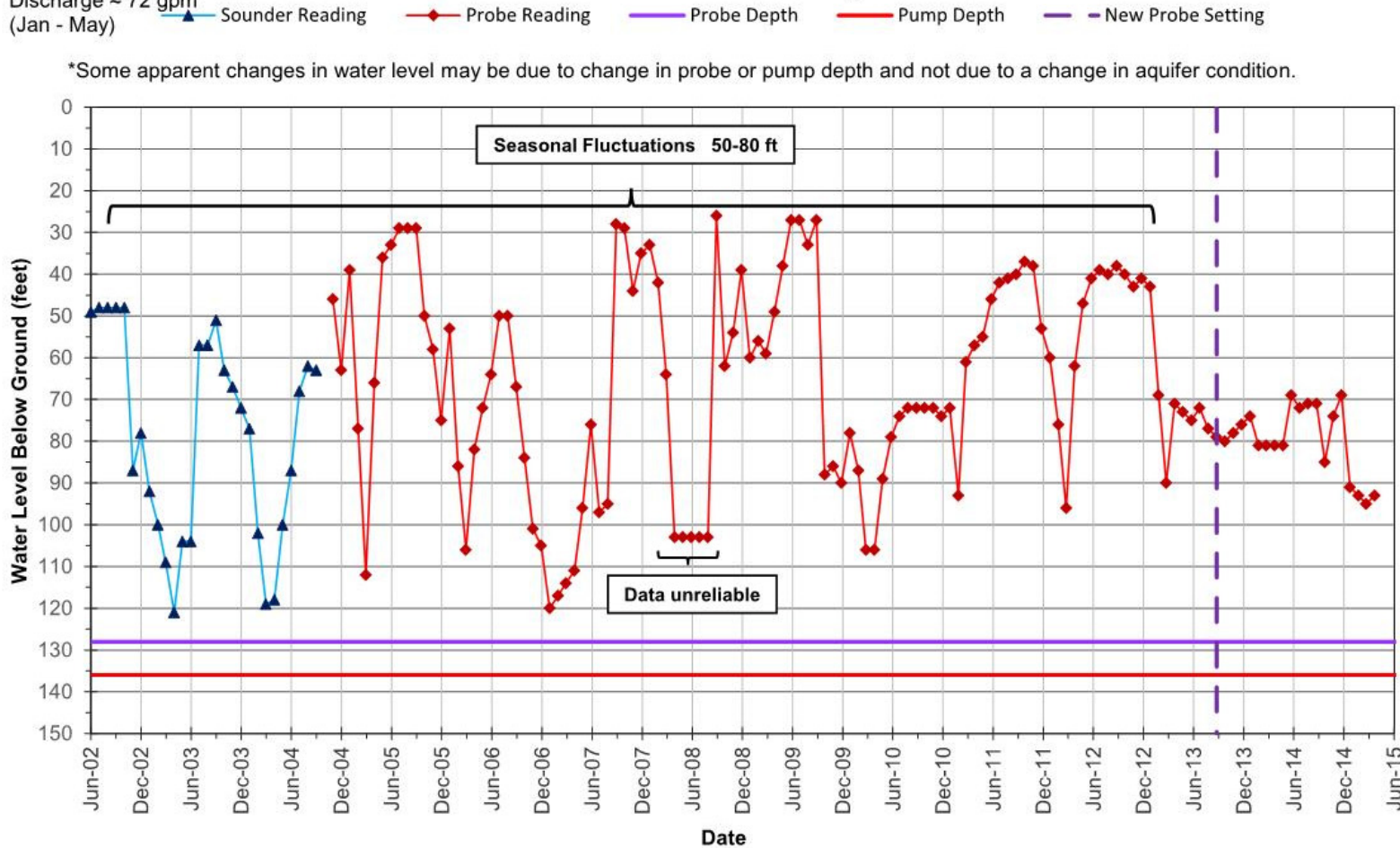
*Some apparent changes in water level may be due to change in probe or pump depth and not due to a change in aquifer condition.



Historical Water System Operations

Depth = 144 ft
 Pump depth = 136 ft
 Probe depth = 128 ft
 Discharge ≈ 72 gpm
 (Jan - May)

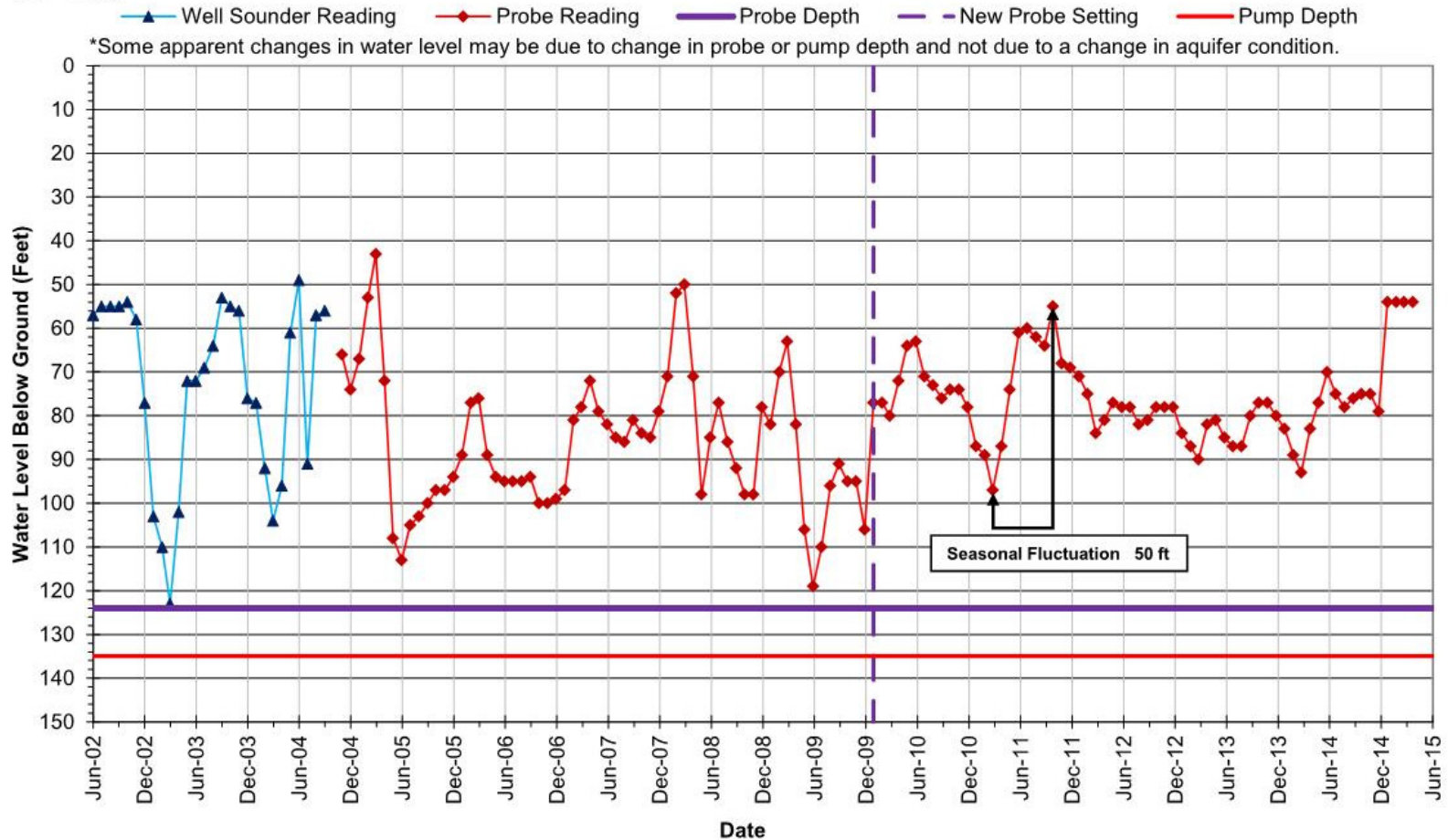
Water Levels - Well 26 Town of Mountain Village



Historical Water System Operations

Depth = 153 ft
 Pump depth = 135 ft
 Probe depth = 124 ft
 Discharge ≈ 30 gpm
 (Jan - May)

Water Levels - Well 27
Town of Mountain Village



TMV's Water Rights

- TMV has joint water rights decrees with TSG
 - Structures allowed for different uses
 - Generally considered to be fairly senior water rights within the upper San Miguel
 - However, downstream agricultural users are more senior have historically placed a call during dry years

Implications of a Water Rights Call

- Water users with a water right junior to the calling right have two options:
 1. Augment diversions
 2. Curtail diversions
- A water rights call typically occurs when the flow on the San Miguel at Placerville reaches 90 – 100 cfs
 - The flow on June 12, 2018 was 177 cfs
 - The median flow on June 12 is 792 cfs

TMV's Water Rights

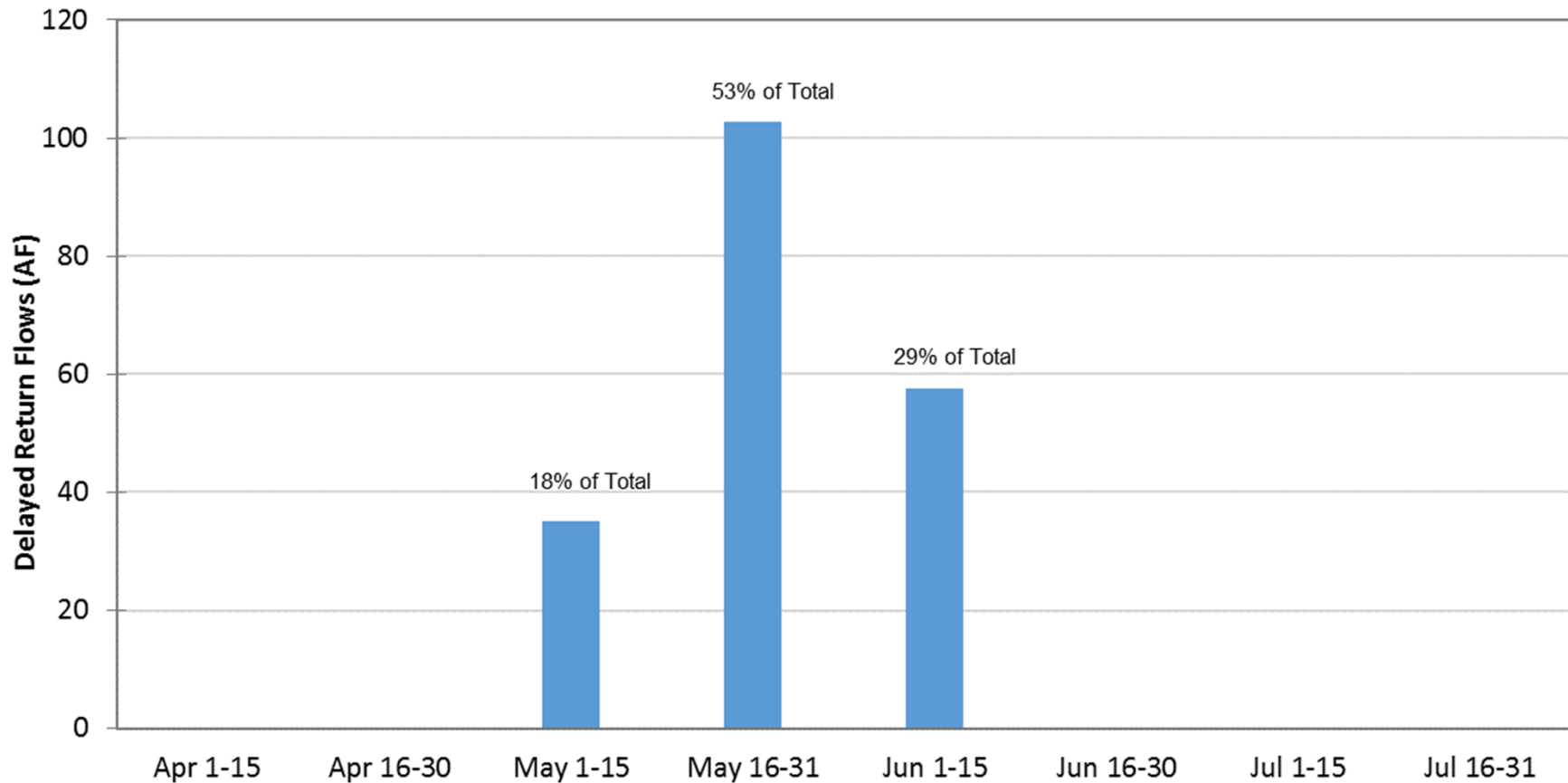
- TMV and TSG have two augmentation plans:
 - 1990 case allows for various amounts of diversions and depletions to be covered by:
 - Historical consumptive use credits
 - Snowmaking return flows
 - Releases from on-mountain storage
 - 2010 case allows for additional amounts of diversions and depletions to be covered by additional reservoir releases and new requirements for previous sources

TMV's Sources of Augmentation Supply

- Snowmaking return flow credits.
 - Varies each year
 - For 2018, no remaining credits after June 15th
- Historical consumptive use credits
 - 369.9 AF each year, if ditches in priority
- Releases from Alternate Prospect Creek Reservoirs Nos. 1 and 3 – approx. 35 AF
- Trout Lake releases – approx. 70 AF

TMV's Snowmaking Return Flow Credits

Water Year 2018 - Delayed Snowmaking Return Flows to Streams



TMV's Historical Consumptive Use Credits

Structure	Administration No.	Cumulative Historic Consumptive Use Credits Available by Priority (Acre-Feet)					
		May	June	July	August	September	October
Prospect Ditches	14771	13.2	29.9	28.8	24.5	16.4	6.3
Lawson Ditch	15148	18.2	42.7	41.8	34.9	22.8	8.7
Agricultural Ditch	16969	19.0	45.0	44.5	37.1	24.1	9.2
Daniels Ditch	17014	20.1	47.7	47.0	39.3	25.6	9.8
Waddell Ditch	17292	22.7	54.4	56.0	45.7	27.4	10.1
LaSalle Ditch	17680	25.5	71.2	75.9	60.1	34.3	11.5
Wagner Ditch	18046	30.2	85.4	92.6	73.9	42.6	14.8
Kinnick Ditch	30604.1732	31.5	88.4	95.5	76.3	44.2	15.4
Kinnick Waste and Seep	30604.18383	32.2	89.9	97.0	77.6	45.1	15.8
Kinnick Ditch No. 1	30604.18414	32.8	91.4	98.4	78.8	45.9	16.1
Agricultural Ditch Enl.	31206	33.4	92.9	100.1	80.4	46.6	16.3

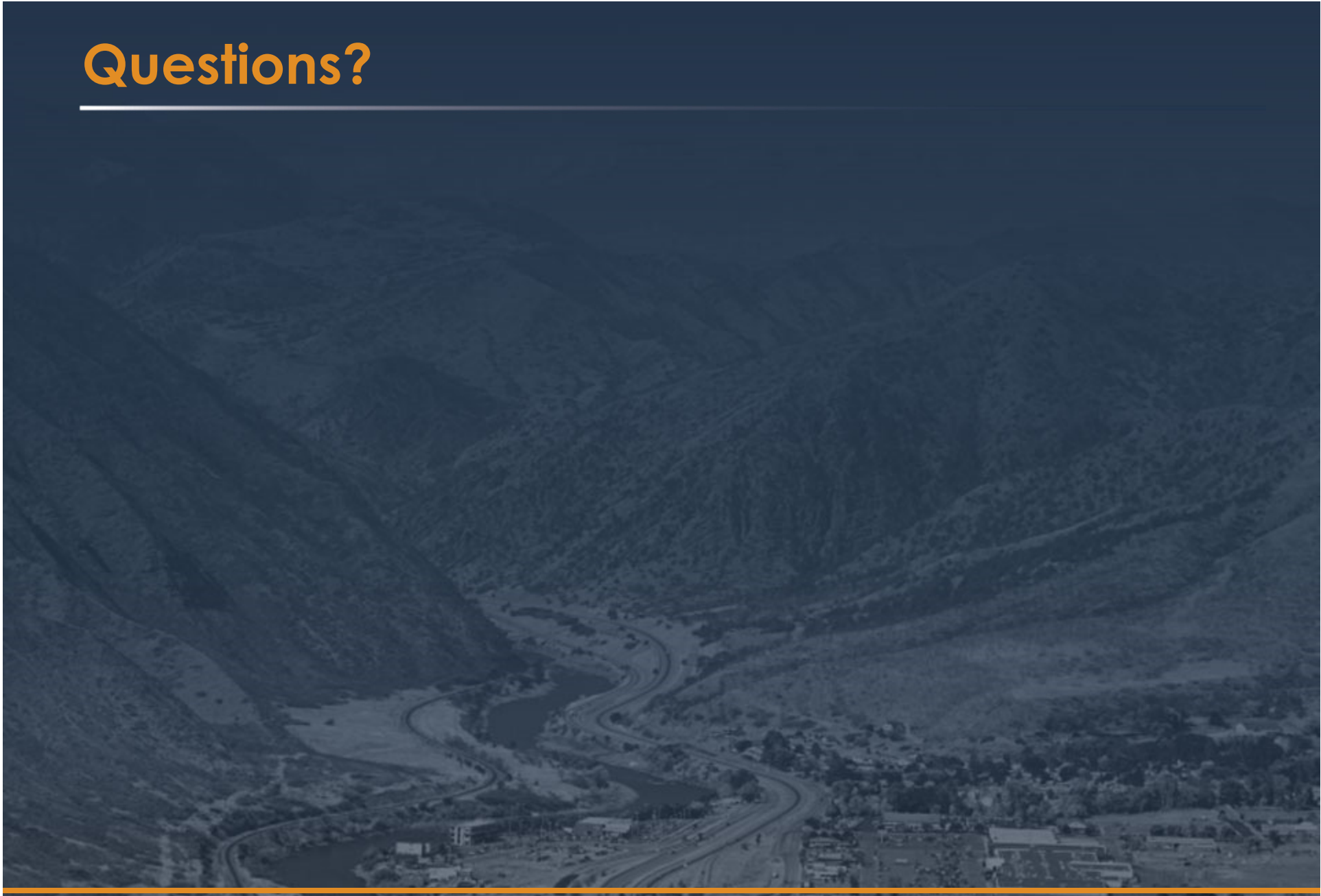
TMV's Storage Augmentation Sources

- Alternate Prospect Creek Res. Nos. 1 & 3
 - Filled by San Miguel valley floor wells
 - Combined capacity of approximately 35 AF
 - Ability to refill curtailed during a senior call
 - Augmentation supply enters San Miguel below Prospect Creek
- Trout Lake releases – 70 AF
 - Trout Lake may not completely fill in 2018
 - Augmentation supply enters San Miguel below confluence with the South Fork

Water Conservation and Long-Term Planning

- TMV has a reliable water supply & sufficient rights
- Prudent to conserve on-mountain supplies because duration of dry period is not known and wells may decline indefinitely
- There is an established hierarchy for water use curtailment:
 - TSG golf course diversion (fairways not watered)
 - then TMV irrigation
 - then golf course tees and greens
 - then potable supply curtailment

Questions?



Susan Johnston

Subject: FW: VCA rent written public comment VCA worksession rent increase

Dear Town Council:

I received the following public comment this morning from a VCA tenant regarding the rent increase worksession today and have copied and pasted her comments below:

Michelle,

I trust your opinion. And, I was going to say in my opinion I don't think a rental increase is an issue as long as improvements and consistency remain. And that money is allocated into the appropriate areas. All we are looking for as tenants is a safe, clean and consistent rental experience moving forward. That's what my email was going to say. Have a nice day.

Courtney Cox

Thank you.
Michelle Haynes



TOWN OF MOUNTAIN VILLAGE

455 Mountain Village Blvd. Suite A
Mountain Village, Co 81435
970-728-8000
970-728-4342 Fax

June 14, 2018

Mr. Nathan Vander Broek,

This letter serves to illustrate the Town of Mountain Village's support for the San Miguel Authority for Regional Transportation's (SMART) application to CDOT for operating and administrative funding assistance.

When the residents of Mountain Village voted to create SMART in partnership with the Town of Telluride and San Miguel County, it was our intention that the new RTA would become the umbrella organization for previously existing regional transit services. The intent was not only that SMART would become the common operator, but also that SMART would be the entity responsible for applying for and managing grants in support of those regional services. SMART's application is a key piece of this transition.

We understand the demand for transit funding that exists across the state, and have worked hard at the regional level to create SMART in an effort to help address the needs in our region. We are committed to our support for SMART for the long haul and are excited for SMART to become a CDOT grant partner.

On behalf of the Mountain Village Town Council, thank you for your consideration of SMART's application!

Sincerely,

Laila Benitez, Mayor
Town of Mountain Village

Cc: David Averill, SMART Executive Director
Ross Herzog, Telluride Town Manager
Lynn Black, San Miguel County Administrator