



Western Slope Environmental Resource Council

March 9, 2006

Delta County Board of County Commissioners
Wayne E. Wolf, R. Olen Lund, Lela J. McCracken
501 Palmer, #227
Delta, CO 81416

To the Delta County Board of County Commissioners,

We at the Western Slope Environmental Resource Council (WSERC) are writing to respond to the recommendations contained in your January 10, 2006 letter to the Roadless Task Force (hereafter, "letter"). We appreciate the scope of your letter, which addresses the important issues of agriculture, energy development, timber, tourism and recreation. These issues engage and affect many of our Delta County residents, including the 400+ members of our organization.

As conservationists, we agree with your recognition of the Currant Creek, Turner Creek, Clear Fork, Huntsman and Mendicant areas as ones deserving of protection. However, we must advocate strongly for the protection of ALL existing roadless areas, and take the position of emphatically and absolutely opposing any further incursions into any relatively roadless area in Delta County, except where the long-term result will be more, not less, wilderness.

In the interest of expanding and clarifying this position, we offer the following comments in response to issues raised in your letter:

Agriculture

Your letter suggests that the area around Overland Reservoir should not be included in the Roadless Inventory, citing the area's importance for recreational fishing, and the need for reservoir maintenance. We believe that applying the above logic to our public lands will result in incremental and eventual loss of all roadless areas in in Delta County at the behest of

relatively few users that want motorized access to any point in the landscape.

Provisions can be made to allow access for maintenance and administration of Overland Reservoir and similar areas without compromising roadless status. Hunters and fishers come to the Overland Reservoir area from all over the country to hunt on horseback and on foot. This area offers premier hunting experiences due in large part to the closure of the roads in the area. These roads were closed through the efforts of WSERC in cooperation with the Forest Service and the Rocky Mountain Elk Foundation and were originally mandated by the Chief of the Forest Service in his response to the appeal of the 'Stevens Gulch Road and Related Timber Sales EIS' in 1985: "Ensure that those road closures...that are intended to reduce disturbance to elk are in fact implemented and maintained." WSERC has been thanked by local hunters for helping to close these roads and thereby improving the quality of hunting in that area. Changing the area's roadless character would lessen the appeal of the area.

Like the Commissioners, we support sustainable grazing on public lands, and the indirect economic benefit it brings to the county. It is not apparent to us how maintaining our roadless public lands will be detrimental to livestock sales receipts. As the Commissioners admit in the next paragraph of the letter, "Public lands ranchers are somewhat ambivalent about roads." Roads afford ranchers vehicular access to their livestock, but also afford the general public vehicular access to those same lands. Grazing is permitted in Wilderness Areas, and due to the roadless character of these areas, ranchers enjoy a degree of safety and seclusion for their herds. Furthermore, there are provisions under the Roadless Area Conservation Rule of 2001 allowing vehicular access to rangers and land managers for maintenance and repair of existing infrastructure.

Energy Development

Recent discussions among members of the North Fork Coal Working Group have indicated that Mountain Coal Company is the only local coal mining operator who has expressed the intention of conducting activities and constructing roads in roadless areas, specifically, in the Sunset Trail area. Please be advised that an October 2005 agreement between Mountain Coal Company and WSERC provides for exploration and mining in the area, followed by restoration of the Sunset Trail area to its previous roadless character. Therefore, the existence of roadless areas on the GMUG is not an impediment to coal development, and it is not necessary to exclude Pilot Knob and Flatirons from inventoried roadless areas, as suggested by your letter.

Timber

Regarding your statement on roller chopping ("They and others who specialize in treatments such as roller chopping and mulching keep our forests healthy"), there is no scientific support at this time that such a statement has been tested. To the contrary, a recent study in *Science* [see Reference below] has shown that disturbance caused by roller chopping decreases recruitment of trees, and was shown to reduce the rate of regrowth of trees in fire-salvaged areas.

For both timber and ranching, rules can be established for temporary roads to be used, then obliterated and restored. However, the Forest Service has not in the past demonstrated the availability of funding to restore roads, nor the knowledge to do it effectively. Agreements wherein an industry commits to payment may be an option, as might roadless timbering approaches (using horses, for example). Any program will need to plan for effective monitoring and enforcement. We encourage the search for innovative and cooperative solutions to these issues that benefit all in the long run.

We are unclear on any existing conflict regarding timber harvest in the Electric Mountain and McClure Pass areas. Do your comments refer to possible future conflicts?

Tourism

As mentioned above, hunters come to Overland Reservoir area from all over the country to hunt on horseback. This area is considered premier hunting area due to the closure of the roads in the area, and there are other Delta County roadless areas that enjoy similar reputations and use. You mention the "quiet experience" sought by tourists and locals in roadless areas. Maintaining and conserving existing roadless areas will go far to preserve opportunities for quiet experiences, and continue the economic benefits associated with these roadless area experiences for the county.

Recreation

The long term and cumulative effects of opening any more lands to motorized vehicles must be carefully considered in the larger picture of what we want our county to look like, and be capable of, in the next 20, 50, or 100 years. Technology such as ATVs was not considered in planning many years back, and there are as yet unanticipated technological developments that will manifest in the future that may threaten further the limited acreage of roadless areas in the county. Because of the annual, rapid growth in the number of motorized users,

and because of the increasing power and destructiveness of motorized vehicles, before further loss of public land values are tolerated, we would like to see a modeling study of the likely impact of current trends projecting into the next 30 to 50 years.

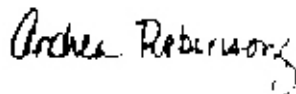
Moreover, there is no consideration at this point of "enlargement of roadless areas," as your letter suggests. The issue is loss of roadless areas, due in part to the cumulative effects of *motorized* recreation.

Wildlife

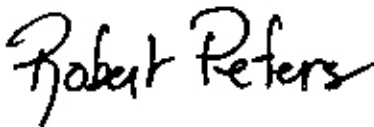
A report from the Colorado Division of Wildlife stated: "It is the consensus opinion based on science, local expertise and sound knowledge that *all* Inventoried Roadless Areas in Colorado should be protected" (emphasis is in the original document; as reported in Denver Post 3/4/06).

WSERC appreciates your time and consideration of our concerns regarding the important issue of preserving roadless areas in Delta County. We very much appreciate the effort you put into your response to the Roadless Task Force. We would welcome an opportunity to meet with you to explore ways in which we can work together to further protect our beautiful county for future generations while ensuring that ranchers can continue to practice sustainable grazing on our public lands. We also ask you to consider our concerns in your future comments and deliberations on roadless area issues.

Sincerely,



Andrea Robinson, Chair, Public Lands Committee, WSERC



Rob Peters, Executive Director, WSERC

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Reference:

Donato, D.C, J. B. Fontaine, J. L. Campbell, W. D. Robinson, J. B. Kauffman, B. E. Law. 2006. Post-Wildfire Logging Hinders Regeneration and Increases Fire Risk,. *Science*, Vol. 311. no. 5759, p. 352.

Cc: Russell George, Chair, Governor's Roadless Areas Task Force
Charles Richmond, GMUG Forest Supervisor