



October 20, 2012

Senator Mark Udall Office
Att: Jill Ozarski
999 18th Street
North Tower Suite I 525
Denver, CO 80202

RE: Central Mountains Wilderness & Forest Health Summit

Dear Ms. Ozarski;

I wanted to follow up on our brief discussion at the Governor's Forest Health Summit on October 12, 2012. I thought the presentation was great and the compelling discussion outlining the undeniable situation that surrounds poor forest health levels was very welcome. While the mountain pine beetle has heavily impacted Northern Colorado, most of Southern Colorado forests have been spared the wide scale devastation that has impacted northern Colorado. As was noted at the Summit, the explosion of the spruce beetle out of the Weminuche Wilderness and across Wolf Creek Pass has greatly expanded areas that are going to be experiencing significant declines in forest health from these infestations.

The Governor's Forest Health summit highlighted many different facets of forest health concerns, the Organizations are aware much of this information has been echoed in other proceedings, both involving Senator Udall's hearing earlier this summer in Colorado Springs and Representative Tipton's House Committee hearing in Montrose. The Organizations welcome and continue to support the active role that Senator Udall has taken on the forest health issue. While wildfire activity is a highly publicized result of poor forest health, much of the beetle killed forests will not be impacted by wildfire. Rather the bulk of these areas will be impacted by gravity, causing the trees to fall in tangled snarls blocking trails and safe access for all users. These snarls will limit the ability of all users to safely hunt and fish in areas accessed by trails where falling trees have limited cross country foot travel.

The Organizations are aware that once again there is renewed pressure from the Hidden Gems Campaign to move forward with the Central Mountains Wilderness proposal that your office has been reviewing. As a result of this renewed push for Wilderness, the Organizations have to again state our vigorous opposition to the proposal and note that almost all management activity that has been found necessary to protect forest health in the Summit and other hearings are completely prohibited in a Wilderness area. While there are general assertions that Wilderness designations improve forest health, these assertions are not supported by any science and are directly contradicted by the expert testimony that has been provided in numerous public hearings and peer reviewed published research documents created by both State and Federal Land managers. These findings must not be overlooked when any land management decision is made.

Our Organizations are very concerned that the declining forest health will impact all facets of recreation in Colorado, and we are frankly puzzled as to the lack of interest in forest health issues that has been displayed by many other user groups. The Organizations are aware that the motorized community is comparatively well situated to address trees falling on trails, as motorized routes are often maintained with Forest Service good management crews, which are exclusively funded by monies generated by OHV registrations. A copy of the Colorado State Trails program fact sheet is enclosed with these comments for further information on the program. There are currently 14 good management crews, made up of approximately 5 full time seasonal employees, assigned to Ranger Districts throughout Colorado and an additional team that travels the

state on an as needed basis. Every year more teams are formed to maintain trails on Ranger Districts. This year these teams spent most of their time removing dead trees from trails and adjacent areas.

The Organizations are aware other user groups simply do not have the resources to address large scale tree falls on trails. While volunteers are able to maintain small portions of non-motorized routes, these resources are not able to address threats at the level of the spruce and pine beetle epidemics. While these resources are limited, land managers are able to allow mechanized activity, such as the use of motor vehicle and chainsaws, in maintenance of non-motorized routes outside Wilderness areas. This flexible management authority allows these limited resources to be effectively applied to non-motorized routes. Unfortunately, land managers are severely hampered by Congressional Wilderness restrictions, as they lack the flexibility to allow mechanized assistance in maintaining routes in Wilderness. The Organizations must note that any assertion that thousands of dead trees could be effectively dealt with by using hand saws and horses probably lacks any realistic basis.

1. Deteriorating forest health threatens significant portions of the Colorado Economy.

Healthy forests are exceptionally relevant to our members, as frequently our members are a broad spectrum outdoor enthusiast, meaning they may be using their OHV for recreation one weekend but the next weekend they will be walking for pleasure (88.9%), using a developing camping facility (44.7%), using a Wilderness or primitive area (58.1%), fishing (44.6%) or hunting (28.4).¹ The Organizations believe that the unhealthy forests pose a significant economic risk to the state of Colorado and a significant safety threat to any user of the forest. As we have previously discussed, a snowmobiler was killed in the Snowy Range portion of the Medicine Bow/Routt National forest after a falling dead tree struck him on a maintained trail. While we hope this type of an incident is an isolated incident, the Organizations have to believe similar incidents could occur again given the number of backcountry recreational users and the number of dead

¹Cordell et al; USFS Research Station; *Off-Highway Vehicle Recreation in the United States and its Regions and States; A National Report from the National Survey on Recreation and the Environment* February, 2008; at pg 41-43.

trees adjacent to trails. These type of incidents will not foster expanded use of Colorado's trail network, but rather encourage other types of activity.

Recreation is a significant contributor to the Colorado economy as CPW research indicates 90% of Colorado residents are trails users. CPW has determined hunting and fishing contributes \$2.5 billion annually to the Colorado economy. The Outdoor Industry Foundation determined outdoor non-motorized recreation contributes \$2.5 billion to Colorado's Economy and COHVCO's economic impact study determined that OHV recreation contributes \$1 billion per year. The Organizations are aware that these studies are not designed to be mutually exclusive and have significant overlap in their calculation methodology. These economic impacts are cited here to clarify that the economic impact of recreation is clearly significant. All of these activities will undoubtedly be negatively impacted by the high number of falling trees, as a tangled web of trees poses significant obstacles to anyone wanting to cross that area regardless of why they are there.

While the motorized community has developed a funding source to remove and deal with dead trees that may block multiple use motorized routes on public lands, the trail users seeking to maintain non-motorized routes lack a similar funding mechanism. The blocking of trails in designated Wilderness areas will negatively impact local economies as recreational users will no longer have access to these opportunities, as maintenance of these opportunities will simply be cost prohibitive. Blockages of non-motorized routes could also significantly increase socially based user conflicts on public lands, as non-motorized users may seek closure of multiple use trails, previously maintained by good management crews, in order to address the loss of unmaintained non-motorized trails. This type of a proposal would be **VIGOROUSLY** opposed by the motorized community.

The Organizations believe there is a bigger question that must be addressed in the discussion of forest health and economics before ever looking at expanding current Wilderness boundaries. Mainly, how do agencies maintain trails that clearly will be blocked by falling trees in the existing Wilderness areas? The Organizations believe this question must be answered before any discussion of user need for more Wilderness is started. Expanding management decisions, that are clearly not sustainable, simply makes no sense as these newly expanded areas will simply be lost to all recreation once significant trail maintenance is needed.

2. New research specifically identifies the negative impact that designated Wilderness has on forest health.

Attempting to manage the current forest health issues as an isolated incident in time that will not be repeated would be a mistake. Research indicates both mountain pine beetle and spruce beetle infestations have happened numerous times in the last century and predictions indicate this infestations will become more frequent and more severe. Management must address the fact that these pest infestations will probably happen again in our lifetimes and management decisions must be tailored to provide for long term management of a long term problem. The need for long term thinning and active management is specifically identified as an effective tool for management of these infestations in the Forest Service report prepared at your offices request. Clearly thinning and mitigation actions will not occur forest wide in a short period of time, these actions may take many years and be part of a more proactive management regime for Colorado public lands.

This long term vision and management opportunity will not be aided with the imposition of new Wilderness restrictions. The Organizations are aware that some of the areas proposed for additional Wilderness area are very difficult to thin. While this may be the case for some areas, other areas are available for thinning and active management. Obviously given the scale of thinning and remediation that is necessary, it could be some time before these areas could be thinned.

Wilderness and improperly managed Roadless areas were previously identified by the Forest Service as a significant factor contributing to and limiting the ability to manage the mountain pine beetle epidemic. This report is not discussed at length in these comments as previous comments have addressed this report. Since the release of this Forest Service report, additional Colorado Forest Service researchers have reached the same conclusions. The Colorado State Forest Service's 2011 Forest Health report specifically identifies a major contributing factor to the spruce beetle outbreak as:

"Outbreaks typically occur several years after storms cause windthrow in spruce trees, which are susceptible to blowdown because of their shallow root system. Spruce beetles initially breed in

the freshly windthrown trees, and subsequent generations attack and kill live, standing trees." ²

The lack of access to Wilderness areas to manage blow down areas is specifically identified as a major limitation in forest managers ability to address spruce beetle outbreak. These blow downs are directly identified as causing the spruce beetle outbreaks. The 2011 State Forest Service report specifically states:

"Many areas where spruce beetle outbreaks occur are remote, inaccessible or in designated wilderness areas. Therefore, in most cases, foresters can take little or no action to reduce losses caused by this aggressive bark beetle. However, individual trees can be protected on some landscapes."³

The Organizations must note the 2011 State Forest Service report extensively discussed how EVERY major spruce beetle outbreak in the state of Colorado was associated with a major wind event in a Wilderness area, which could not be managed by foresters. A copy of this report has been included with these comments to allow for a review of this discussion.

The Organizations urge your office to allow land managers to make science based decisions for the management of public lands and allow active forest management for as much public land as possible. While supporters of Wilderness may provide discussions that tug at heart strings regarding the Wilderness ideal, scientific research has concluded this ideal directly and significantly contributes to the overall poor health conditions of Colorado forests.

3. Decisions to remove specific areas from previous Wilderness legislation must be supported.

The Organizations have to note that the most recent call to action from the Hidden Gems Proposal is seeking to obtain inclusion of the Lower Piney, Elliot Ridge, Crazy Horse and other areas in the proposed Wilderness legislation. These areas were removed from Rep. Polis legislation as a result of ongoing good faith

² Colorado State Forest Service; *2011 Report on the Health of Colorado's Forests*; at pg 9.

³ Colorado State Forest Service; *2011 Report on the Health of Colorado's Forests*; at pg 11.

discussions between user groups facilitated by Rep. Polis office based on the high degree of mechanized and motorized that occurs in these areas throughout the year. These decisions to exclude these areas must be honored moving forward.

Attempts to include these areas in on-going discussions will make it very hard to move forward with any discussions regarding new areas. These attempts also significantly increase frustrations between the groups involved in the user group discussions. The motorized community had no input in the creation of any portion of the wilderness proposal, prior to involvement with governmental representatives. Once an area is removed from the Proposal, the area must remain off the table for all future discussions. The Organizations can find little solace in a consensus position regarding management of these areas, that will simply be ignored by a party to that process when it is convenient.

The Organizations have been very hesitant to undertake user group type discussions on Wilderness as areas excluded in one round of legislation are frequently returned immediately back on the table after legislation is passed. New proposals simply attempt to move forward, regardless of the previous consensus regarding management. The ongoing attempts to reintroduce excluded areas into the good faith discussions prior to any legislation do nothing more than provide concrete reasons to clarify why we are hesitant to enter into such discussions at anytime.

The Organizations must also note that the High Country Snowmobile Club has received a grant from the State Parks Snowmobile program for the purchase of a snowcat to begin grooming previously ungroomed trails in the areas north of the existing Eagles Nest Wilderness. A high percentage of these groomed winter trails are routes that remain open for summer motorized recreation in the summer. The Organizations are aware you are planning on discussing the Central Mountains Proposal with the High Country Club independently, but we would like to confirm this grooming program is vigorously supported by the Organizations. As the High Country Club will confirm there is broad support for this grooming program from all user groups, and vigorous support for the proposal from the Forest Service.

4. Conclusion.

The Organizations are aware there is an ongoing push to renew waning interest in Wilderness proposals in the State. This initiative is completely at odds with the overwhelming body of research that has emerged from recent hearing and seminars regarding forest health. While these seminars and meetings have addressed forest health in a forestry context, the Organizations believe declining forest health poses a significant threat to all forms of outdoor recreation in the state of Colorado. The Organizations are puzzled as to why other user groups are not seeing these threats to access as a more significant threat to recreation in Colorado.

If you would like a copy of any of the reports relied on in these comments or have questions please feel free to contact Scott Jones at 508 Ashford Drive, Longmont CO 80504. His phone is (518)281-5810.

Sincerely,



John Bonngiovanni
Chairman and President
Colorado OHV Coalition



D.E. Riggle
Director of Operations
Trails Preservation Alliance

Scott Jones, Esq.
COHVCO CO-Chairman
CSA Vice-President

CC: Colorado Congressional delegation