May 19, 2015

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Colorado Roadless Rule
740 Simms Street
Golden, CO 80401

Sent Via: U.S. Mail First Class; and Fax No: 303-275-5134; and email: https://cara.ecosystem-management.org/Public/CommentInput?Project=46470

RE: Scoping for Supplemental Draft Environmental Impact Statement to Reinstate the North Fork Coal Mining Area Exception of the Colorado Roadless Rule

To Whom It May Concern:

On April 01, 2015, the U.S. Department of Agriculture Forest Service initiated scoping for a Supplemental Draft Environmental Impact Statement (SDEIS) to reinstate the North Fork Coal Mining Area exception of the Colorado Roadless Rule (CRR). The Board of County Commissioners of the County of Gunnison, Colorado respectfully submits the following scoping comments.

The CRR was a collaborative effort between conservation groups, multiple industries and communities throughout the state. These groups came together to work towards shared goals of conservation and economic viability of rural Colorado. Concessions were made on all sides to reach a common goal. Gunnison County actively participated in those discussions and supported the CRR, including the North Fork Coal Mining Area exception.

Through our own regulatory process, Gunnison County designated the North Fork Valley Coal Resource Special Area and adopted the Coal Resource Special Area Coal Mining Regulations. In those regulations, Gunnison County recognizes that coal is a resource valuable to the United States, Colorado and Gunnison County that deserves to be extracted and put to use.

Additionally, Gunnison County has consistently supported exploring options to recover methane from active and inactive coal mines and has urged that access to these sites be considered in crafting the Colorado Roadless Rule. We believe this is an imperative part of the analysis of carbon emissions.

When analyzing carbon emissions, please note that the North Fork coal is some of the cleanest burning coal in the world. By mixing this coal with other sources in the United States, we actually decrease our carbon footprint. We acknowledge that coal is not going to be the long-term energy resource it has been in the past. As we start to transition away from coal to other energy sources, we need to ensure that we are utilizing the cleanest resources available.

Gunnison County has also stated, in correspondence dated May 4, 2012 to then Secretary of Agriculture Tom Vilsack regarding the Colorado Roadless Rule, that "(w)hile coal mining is vital to Gunnison County, we must balance the equation by also considering recreational tourism as it is our primary economy.

In order to ensure the continued viability of our tourism economy, it will be imperative to keep currently undeveloped roadless areas free from industrial uses."

We support the process of the SDEIS and review of the impacts that would be caused by reinstatement of the North Fork Coal Mining Area exception to the Colorado Roadless Rule. We support the analysis of what the impacts of allowing temporary road construction for coal exploration and/or coal-related surface activities would be to the viability of coal mining in the North Fork, opportunities to recover methane and overall carbon footprint while ensuring a quality tourism economy.

Gunnison County believes that a balance can be maintained and continues to support the CRR, including the North Fork Mining exception.

We appreciate your consideration.

Sincerely,

Paula Swenson, Chairperson	Phil Chamberland, Commissioner	Jonathan Houck, Commissioner