AGENDA ITEM or FINAL CONTRACT REVIEW SUBMITTAL FORM

Agenda Item: Ratification of Correspondence; Secretary of Agric

Action Requested: Motion

Parties to the Agreement:

Term Begins: **Term Ends:** **Grant Contract #:**

Summary:

The attached letter was submitted online (Letter ID #46470-1351-1338) and sent via postal mail on 1/13/2016. It was crafted by the Attorney's Office, and the commissioners gave approval for use of their signature stamps.

Fiscal Impact:

Submitted by: Katherine Haase **Submitter's Email Address:** khaase@gunnisoncounty.org

Finance Review: ○ Required ◉ Not Required

Comments:

Reviewed by: Discharge Date:

County Attorney Review: ○ Required ◉ Not Required

Comments:

Reveiwed by: Discharge Date: Certificate of Insurance Required Yes ○ No ○

County Manager Review:

Comments:

Reveiwed by: GUNCOUNTY1\mbirnie Discharge Date: 1/13/2016

◉ Consent Agenda ○ Regular Agenda ○ Worksession Time Allotted:

Agenda Date: 1/19/2016

Revised April 2015

Gunnison County
COLORADO

Gunnison County Board of County Commissioners
Phone: (970) 641–0248 • Fax: (970) 641–3061
Email: bocc@gunnisoncounty.org • www.GunnisonCounty.org

January 12, 2016

Tom Vilsack
Secretary of Agriculture
Colorado Roadless Rule
740 Simms Street
Golden, CO 80401

VIA U.S. FIRST CLASS MAIL &
ELECTRONIC SUBMISSION TO
www.regulations.gov

RE: Supplemental Draft Environmental Impact Statement ("SDEIS") to Reinstate the North Fork Coal Mining Area Exception of the Colorado Roadless Rule

Dear Secretary Vilsack:

On November 20, 2015, the U.S. Department of Agriculture Forest Service initiated a comment period on the proposed rule on Roadless Area Conservation; National Forest Lands in Colorado. The Board of County Commissioners of the County of Gunnison, Colorado respectfully submits the following comments.

The Proposed action, Alternative B, is to reinstate the North Fork Coal Mining Area exception as written in 36 CFR 294.43(c)(1)(ix) on 19,700 acres of National Forest Service lands. The exception provides for temporary road construction and reconstruction for coal exploration and/or coal-related surface activities within the North Fork Coal Mining Area. The exception also provides that such roads may be used for collection/transport of coal mine methane. The exception defines that buried infrastructure, including pipelines, needed for the capture, collection and use of coal mine methane could be located within the rights-of-way of temporary roads that are necessary for coal-related surface activities, including the installation and operation of methane venting wells subject to site-specific permitting. No upper tier Colorado Roadless Areas are designated in the North Fork Coal Mining Area under this alternative. Upper tier are a subset of Colorado Roadless Areas which have limited exceptions to provide a high-level of protection.

Gunnison County supports Alternative B.

The Colorado Roadless Rule 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

200 East Virginia Avenue • Gunnison, CO 81230

participated in those discussions and supported the Colorado Roadless Rule, 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.

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 restates that while 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 is imperative to keep industrial uses out of the currently undeveloped upper tier roadless areas.

We have supported 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 have supported 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 Colorado Roadless Rule. This balance can best be accomplished by Alternative B.

We appreciate your consideration.

Thank you.

Sincerely,

BOARD OF COUNTY COMMISSIONERS
OF THE COUNTY OF GUNNISON, COLORADO

By:_____	By:_____	By:_____
Paula Swenson	Phil Chamberland	Jonathan Houck
Chairperson	Vice Chairperson	Commissioner