



September 28, 2011

Representative Tipton
2525 North 5th St, Suite 702
Grand Junction CO 81501

RE: Recent Wilderness proposals

Dear Representative Tipton;

We are contacting you to thank you for your continuing opposition to the numerous Wilderness initiatives that have been recently proposed, including Hidden Gems, the James Peak Wilderness Expansion and the numerous initiatives in Utah recently advertised in the Denver Post. Our organizations have found numerous concerns that have woven through all the Wilderness proposals we have reviewed. These concerns were discussed at length in the comments regarding the expanded Hidden Gems Proposal we recently submitted to Senator Bennet's office with a CC to your office.

Given the significant number of Wilderness initiatives that have been created in the week since that document was drafted, we felt it necessary to confirm with your office that the same concerns previously outlined are involved in almost every Wilderness proposal we have reviewed. Given the sudden increase in initiatives, we believe this could be an attempt to create another Omnibus land bill that includes significant Wilderness expansions, as was approved two years ago. There are rumors that a draft bill could be prepared. We remain vigorously opposed to land designations through Omnibus bills, as Omnibus bills are designed to address uncontested matters. Clearly Wilderness designations are not uncontested.

Currently 1 in 5 acres under federal management in the state of Colorado is designated as Wilderness. Our organizations believe current designations are sufficient to protect the interests and concerns to be addressed by a Wilderness designation and we are opposed to further designations of Wilderness without a specific showing of need for the designation. There are many other designations which could protect resources without the blanket prohibitions to most forms of recreation which are included in a Wilderness designation.

Recreational usage of public lands provides a significant benefit to the Colorado economy, especially in the smaller mountain communities which have already lost more traditional sources of revenue, such as timber, farming and mining. In 2008, COHVCO commissioned an economic impact study that found that over 1,000,000,000 dollars of positive economic impact and 10,000 jobs resulted from OHV recreation to the State economy. OHV recreation also accounted for over \$100,000 million in tax revenue to state and local municipalities. Wilderness proposals often assert possible positive economic impacts from designating Wilderness relying on analysis

that are highly theoretical, are badly out of date, and not based on specific analysis of known impacts on communities. Analysis based on these faults is simply not acceptable to make any management decision on.

Given the significant negative economic impacts from Wilderness designations, logical thought would lead one to believe there would be a clear and significant benefit for future management of these areas to off-set this risk. This is not the case. The Forest Service has found that almost all management concerns that exist in areas not designated Wilderness remain after designation of an area as Wilderness. Issues such as resource damage, litter, user conflicts and wildlife management continue to be serious management concerns in Wilderness areas, and are far more expensive for forest managers to address after Wilderness designations.

Wilderness proposals also omit any discussion of conflicts between the site specific analysis of proposed Wilderness areas previously performed by both the Forest Service and Bureau of Land Management. Our organizations believe this comparison is always avoided and analysis performed by the agencies directly conflicts with most assertions made in the Proposal. The agencies take a far more broad scope of users into account in their analysis. Our organizations believe that a broader scope of review is necessary to manage public lands for public benefit.

Discussions regarding Forest Service planning documents and other forest management analysis studies performed by State agencies also are omitted from analysis in Wilderness proposals. These planning documents often have repeatedly found proposed Wilderness areas unsuitable for Wilderness designation. State forest management documents conclude these areas are badly in need of active forest management to remediate the heavy levels of damage from mountain pine beetle and spruce beetle infestations in these forest areas. The current heavily damaged condition of the forests will slow recovery of the areas, greatly increase wildfire risks and possibly negatively impact the various wildlife species that inhabit these areas.

Our organizations must respectfully request that your office critically review all Wilderness proposals and continue your opposition to those that there is not a specific showing of need and true community support. Most Wilderness proposals will directly reduce recreational opportunities for the overwhelming portion of the public who are seeking to enjoy the quality recreational experience that has been provided by healthy Colorado forests historically.

Sincerely,



John Bonngiovanni
Chairman and President
Colorado OHV Coalition



D.E. Riggle
Director of Operations
Trails Preservation Alliance

Scott Jones, Esq.
COHVCO BOD/ CSA Vice President