



Senator Mark Udall  
B40E Dirksen Senate Office Building  
Washington, DC 20510  
January 26, 2012

Re: Central Rockies Land Exchange

Dear Senator Udall,

I am writing you on behalf of the NFRIA-WSERC Conservation Center (NWCC) regarding the Central Rockies Land Exchange (also referred to as the Bear Ranch Land Exchange).

NWCC is a grassroots organization located in western Colorado. Our organization began in 1977 when neighbors joined to stop coal mines from dumping waste next to the river. Over the years our mission broadened to protect local water, public lands, and human health. In 2010 we merged with a local watershed group, which has a history of river restoration, water monitoring, and education. Fifteen percent of North Fork Valley residents are members of NWCC. Our 600 members are ranchers, farmers, academics, retired coal miners, orchardists, small business owners, artists and more.

NWCC has some serious concerns about the Central Rockies Land Exchange as it has been reported by representatives from the Bear Ranch and Western Land Group. We join our local community in urging you to withhold your support of the Central Rockies Land Exchange until the concerns outlined below are adequately addressed.

NWCC has closely followed the evolution of the proposed Central Rockies Land Exchange. While we initially planned to wait to respond until legislation is offered, we have come to realize that our members and many other residents of our valleys believe this proposed land exchange should not be addressed legislatively. Therefore, we ask that you refuse to carry this bill or support the legislation.

By purchasing and offering land to the National Park Service in Utah in exchange for public access closure to public lands in Delta and Gunnison Counties, Mr. Koch can avoid a public process because interstate exchanges require legislative action. We ask that you refuse to carry this bill or support the legislation that he seeks. We ask that this land exchange request be denied and that the Bear Ranch be directed to work with our local federal agencies to develop a land exchange proposal that would equally benefit the public and the Bear Ranch.

There are a number of serious issues which local residents and visitors want vetted publicly. If you carry or support legislation, you will have deprived your constituents the opportunity to work with the Bear Ranch to explore alternatives that could benefit local and visiting public land users as well as the Bear Ranch.

**NFRIA-WSERC Conservation Center**

*Protecting Rivers, Public Lands and Quality of Life in Delta County since 1977*

Box 1612, Paonia CO 81428 ♦ 970-527-5307 ♦ [www.theconservationcenter.org](http://www.theconservationcenter.org)

The following are some serious concerns about the Central Rockies Land Exchange as it has been presented:

First, any land exchange that limits or degrades access to public lands is unacceptable. The proposed Land Exchange will forever remove high-quality public access from the public domain. We will lose a valuable entryway into the Raggeds Wilderness. Eliminating this public access will deprive hikers, especially those with limited mobility, access to some of Colorado's most spectacular mountain vistas and keep hunters from a world-class elk population. The Land Exchange will also eliminate the public's ability to access popular fishing destinations like Snowshoe Creek and Deep Creek which have been enjoyed by our community for generations. The limited access easement on private land offered in return to the North Fork Valley is considered a poor substitute for the current access.

Second, the proposed land exchange would include the construction of parallel trails on public lands. There is ample scientific evidence that this increases potential for damage to the landscape and wildlife. Parallel trails at least double the area of disturbance which experts tell us can increase the potential for erosion, fragment habitat, and disturb wildlife.

A duplicate and parallel trail would conflict with the management prescriptions of the 2010 Gunnison Basin Federal Lands Travel Management Plan. When considering trails, guidance in the Travel Management Plan states as follows: 1) Where conflicts among recreational users can be minimized, combine multiple uses on one route instead of establishing parallel or alternative routes; and 2) abandon routes that are duplicated or unneeded. The plan also identifies areas where additional trails are needed or desired. A parallel Ragged Mountain Trail is not mentioned in the document. A public land exchange should not violate management prescriptions of the affected federal agencies.

Finally, NWCC believes that congressionally-mandated land exchanges reduce transparency and avoid critical public and environmental review. In general, congressional land exchanges guarantee none of the safeguards governed by statutes and regulations intended to protect the public interest like the National Environmental Policy Act (NEPA). The congressional approach does not require public notification, environmental analysis, opportunity for public input, right to appeal, or disclosure of appraisal information.

We believe that what is now a request for legislation to benefit one wealthy individual should not be allowed to proceed through the legislative process. Instead, the Bear Ranch should work with our local federal agencies to come up with a land exchange proposal that would equally benefit the public and the Bear Ranch. Any proposal should go through the normal agencies' processes governed by all the rules and regulations entailed. We thank you for considering our request and urge you to refuse to support legislation on behalf of the Central Rockies Land Exchange.

Thank you,



Andrea Robinsong

Chair, NWCC Board of Directors