

July 14, 2011

Content Analysis Team
Attn: Roadless Colorado Roadless Rule/EIS
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Comments on proposed rulemaking for 36 CFR Part 294: Special Areas; Roadless Area Conservation; Applicability to the National Forests in Colorado

American Forests restores and protects urban and rural forests. Founded in 1875, the oldest national non-profit conservation organization in the country has served as a catalyst for many of the most important milestones in the conservation movement, including the founding of the U.S. Forest Service, the national forest and national park systems, and literally thousands of forest ecosystem restoration projects and public education efforts. Since 1990, American Forests has planted nearly 40 million trees in forests throughout the U.S. and beyond, resulting in cleaner air and drinking water, restored habitat for wildlife and fish, and the removal of millions of tons of carbon dioxide from the atmosphere. American Forests is working to support the protection of roadless areas in our national forests.

American Forests has been a strong supporter for increased protection of roadless areas since January 1998, when a national moratorium on roadbuilding in roadless areas was first announced, leading to the Roadless Area Conservation Rule of 2001. We believe roadless areas need greater protection because they provide vital ecosystem services to society such as clean air and water; critical fish, wildlife, and plant habitat; and climate regulation. These services also provide economic value that compares favorably with commodity production and other extraction-based activities which generally require road building.

Strong protection of Colorado roadless areas needs to continue in order to support small business owners and rural communities where hunting and fishing provide economic stability. However, roadless area protection and use by the energy and skiing industries remain in conflict with the interests of the hunting and fishing communities. To address the multiple interest groups involved, the proposed roadless rule aims to both protect the picturesque roadless areas of

Colorado and address the needs of the local energy and skiing industries. While the Administration's proposal offers some improvements from the 2001 Rule and offers state-customized forest management, we believe the rule still falls short on protecting several benefits that roadless areas provide, such as: undisturbed fish and wildlife habitat, local economic benefits, and outdoor recreational opportunities. To offer a higher level of protection, the rule designates 562,000 acres of Colorado's 4.2 million roadless acres as "upper tier", providing an increase in protection from the 2001 Rule levels. However, this percentage is much lower than the Idaho Rule, which also uses a tiered system and is already in effect. Colorado is proposing around 11 percent as "upper tier", while Idaho's level is around 30 percent. We recommend an expansion of land protected as "upper tier" acres that is comparable to the Idaho Rule levels in order to protect Colorado's valuable hunting and fishing grounds. Increasing the amount of acres designated as "upper tier" will be accomplished by limiting the exceptions for tree-cutting, sale, or removal and road construction/reconstructions (definition of *Colorado Roadless Area Upper Tier Acres*, sec. 294.41).

In order to accommodate the needs of the mining and ski industries, the proposed rule allows for multiple use and certain exemptions on roadless protection. In the proposed Colorado rule, road construction would be allowed on 8,000 acres of skiing areas and 20,000 roadless acres vulnerable to being cut down for existing oil, gas, and coal mining leases. Protection also does not apply to already existing leases. Designated "linear construction zones" (LCZs) allow the energy industry to construct temporary roads for development projects. The use of LCZs and tree-cutting may have significant impacts on fish, wildlife, and plant populations, including: an increase in invasive species, a loss of habitat viability, habitat fragmentation, and threats to endangered species. We recognize that while some tree removal is necessary to reduce the threat of wildfire and insect infestation, this process must be addressed separately from industrial development. We agree with considering alternatives (sec.294.46) that would relocate drilling on areas with pre-existing surface disturbance. Language recommending alternatives and limiting the amount of exemptions for LCZs will allow for more acres to be protected as roadless areas.

In the RDEIS, alternative four offers the most protection for Colorado roadless areas with public identified upper tier acres. This alternative designates a significantly larger number of acres as CRA upper tier than the proposed rule in alternative two (2,614,200 rather than 562,200). The upper tier protection in alternative four is at a comparable level to the Idaho Rule and is the most appropriate plan for protecting Colorado's roadless areas and wildlife habitat.

American Forests supports the protection of Colorado's roadless areas and the Administration's commitment to maintaining roadless area characteristics at least as protective as the 2001 rule. We are strongly supportive of a national roadless rule, eg. 2001, and therefore desire a state level rule. We want to continue to work towards creating a rule that can benefit us all. Thank you for

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the opportunity to comment on the new proposals for protecting roadless areas on the national forests. Please feel free to contact American Forests should you have any questions regarding our comments.

Thank you,

A handwritten signature in black ink, appearing to read "Rebecca R. Turner", is positioned above the typed name and title.

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