



VIA EMAIL

October 20, 2008

Abigail Kimbell, Forest Service Chief
United States Forest Service
Roadless Area Conservation Colorado
P.O Box 162909
Sacramento, CA 95816-2909
COcomments@fsroadless.org

RE: Access Fund Comments to the Colorado Roadless Rule

Dear Forest Service Chief Kimbell:

The National Forests of Colorado are a nationally significant destination for the human-powered outdoor community. Government management that eliminates or damages the natural character of these places adversely impacts the public's ability to enjoy them. I write today on behalf of the Access Fund urging the U.S. Forest Service to keep Colorado's iconic backcountry roadless areas intact, and make the changes noted herein to its proposed Roadless Area Conservation rulemaking ("Proposed Rule") to conserve the four million acres of National Forest roadless areas in Colorado that provide its residents and tourists from across the country with unique backcountry recreation experiences.

The Access Fund

Based in Boulder, Colorado, the Access Fund is the only national advocacy organization whose mission keeps climbing areas open and conserves the climbing environment. A 501(c)3 non-profit supporting and representing over 1.6 million climbers nationwide in all forms of climbing—rock climbing, ice climbing, mountaineering, and bouldering—the Access Fund is the largest US climbing organization with over 15,000 members and affiliates. Many of our members live and climb in Colorado

The Access Fund promotes the responsible use and sound management of climbing resources by working in cooperation with climbers, other recreational users, public land managers and private land owners. We encourage an ethic of personal responsibility, self-regulation, strong conservation values and minimum impact practices among climbers.

Working towards a future in which climbing and access to climbing resources are viewed as legitimate, valued, and positive uses of the land the Access Fund advocates to federal, state and local legislators concerning public lands legislation; works closely with federal and state land



managers and other interest groups in planning and implementing public lands management and policy; provides funding for conservation and resource management projects; develops, produces and distributes climber education materials and programs; and assists in the acquisition and management of climbing resources. For more information about the Access Fund, visit www.accessfund.org.

Colorado Roadless Areas

Colorado's backcountry provides some of our nation's most spectacular destinations for outdoor enthusiasts including mountain biking through incredible alpine vistas, carpets of wildflowers on the cherished 401 trail outside Crested Butte, the headwaters of our nation's most iconic southwestern rivers flowing from 14,000-foot peaks towards 13 states and Mexico, and the challenging terrain and incredible snow of the popular front-range destination for backcountry skiers of Berthoud Pass. These areas, and many other outstanding natural and recreational assets in Colorado, are at risk by the U.S. Forest Service's Proposed Rule.

In Colorado, as in most Western states, much climbing takes place on roadless National Forest land. The captivating terrain in Colorado's backcountry provides high quality climbing opportunities throughout the year. Many Coloradans may not think of these areas as roadless, but we know them for their spectacular alpine settings, subject to the whims of the mountain environment, solitude and accessibility for quick weekend outings.

Included in these roadless area climbing gems are the Ophir Wall outside of Telluride; Greyrock's granite peak in the Front Range Mountains northwest of Fort Collins; the South Platte's Big Rock Candy Mountain, an immense granite crag perched above the South Platte River that offers Colorado's longest slab routes on its 1,500 foot central buttress; and the hidden granite boulders and walls in the dense aspen groves of Independence Pass. A big part of these climbing experiences are their settings, which lie in the heart of Forest System Roadless Areas. Roadless Areas are not quite wilderness, but they feel that way, they also tend to be more accessible and open to a variety of sustainable recreational pursuits.

The Colorado Roadless Rule

Even though Americans already decided to protect all roadless areas in the National Forest System back in 2001, the U.S. Forest Service now proposes a new management plan that will substantially weaken the protections for these irreplaceable climbing areas. The Proposed Rule is a poor deal for citizens of the state. Since the 2001 rule, the US Forest Service has substantially weakened protections for backcountry forests, and the Proposed Rule could open new loopholes that may further degrade the quality of these precious lands. There are a number of improvements to the Proposed Rule that the USFS should consider to ensure Colorado's open spaces, wild landscapes and intact ecosystems are a top priority.



- **The Proposed Rule needs an unambiguous management directive focused on conservation and stewardship of Colorado Roadless Areas**

Preserving roadless area characteristics must be the rule’s express mandate. As presently written, the Proposed Rule is simply a collection of circumstances under which roadless areas values can be subordinated for one development reason or another. Indeed, in defining “Roadless Area Characteristics,” the rule states that the definition creates no legal standard or management requirement. This definition is unacceptable because it provides no enforceable direction that preserves roadless areas.

- **The qualitative and quantitative value of outdoor recreation must be factored into the Colorado Roadless Rule**

Roadless areas are an integral part of Colorado's outdoor space, and natural outdoor space and the public’s ability to enjoy it is a fundamental part of Colorado's identity, state culture and economy. Accordingly, the Proposed Rule should acknowledge active outdoor recreation which contributes \$10 billion annually to the state’s economy and employs 100,000 Coloradoans. Colorado’s outdoor industry greatly supports increased protections for roadless areas.

- **The process to change roadless area designations must be careful, deliberate and designed to encourage robust public participation**

Roadless areas are a finite resource with very high value to Colorado state culture and economics. By opening more acres to road building, or enabling an administrative pathway for more acreage to be opened in the future, the public’s interests are put at great risk. The Proposed Rule allows the Chief of the Forest Service to “add to, remove from, or modify the [roadless area] designations . . . based on changed circumstance or public need.” The Access Fund believes that any boundary changes that would decrease Roadless Area boundaries or values should be deliberate, careful and fully vetted with the public. Boundary changes that further and irreversibly shrink the finite amount of roadless lands are no small matter, and deserve great caution and careful consideration. Such an abbreviated process to amend the provision of Colorado’s Roadless Area protections is unacceptable considering the nature of the resources at stake.

- **A ‘cradle-to-grave’ approach to roads**

The Proposed Rule allows for “long term temporary” roads in Colorado Roadless Areas for a variety of things, like preexisting mineral rights as well as water and utility conveyances. For any new roads, the Forest Service must take a comprehensive cradle to grave approach so that issues of maintenance, environmental impacts, and most importantly, funding are completely settled



well before construction starts. Though the Proposed Rule requires that temporary and long-term temporary roads ultimately be decommissioned and the landscape restored, there is no mandate in the Proposed Rule that there be any money to do either or that the responsible party is obligated irrespective of cost. In addition, restoring the landscape and decommissioning roads must mean restoring the landscape's roadless characteristics. Temporary roads in Colorado Roadless Areas should be the rare exception, not the rule.

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Compared to wilderness areas, Colorado's backcountry roadless areas are easier to get to and recreational activities are less restricted. These areas offer a rare opportunity to experience natural forests and landscapes free of impacts from logging, mining, or road building. Coloradans and US citizens from across the country place a high value on these experiences and these places. On behalf of the US climbing community, I urge you make these changes to the Proposed Rule to keep Colorado's iconic backcountry roadless areas, intact.

Regards,

Jason Keith
Access Fund Policy Director

Cc: Brady Robinson, Access Fund Executive Director
Adam Cramer, Outdoor Alliance
The Honorable US Senator Ken Salazar
The Honorable US Representative Mark Udall
The Honorable Colorado Governor Bill Ritter