

August 13, 2012

Restoration CE Comments
United States Forest Service
P.O. Box 4208
Logan, UT 84323

RE: American Mountain Guides Association, Access Fund, and American Alpine Club Comments to US Forest Service Proposed Categorical Exclusions for Soil and Water Restoration Activities

The American Mountain Guides Association, Access Fund, and American Alpine Club welcome the opportunity to provide comments on the US Forest Service proposed rule for three Categorical Exclusions (CEs) intended to streamline the environmental analysis process regarding soil and water restoration activities of non-system roads and trails that are no longer needed and no longer maintained.

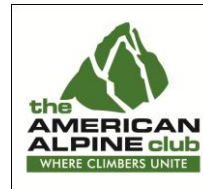
Access Fund, American Alpine Club and American Mountain Guides Association

The Access Fund, American Alpine Club, and American Mountain Guides Association are national climbing advocacy organizations dedicated to climbing access, conservation, advancing the climbing way of life, and advocating for American climbers. The Climbing Organizations each have a long history of working with the US Forest Service, including input on the recent Forest Planning Rule and dozens of forest-wide and site-specific climbing management planning initiatives and stewardship projects around the country. For more about us, see www.accessfund.org, www.americanalpineclub.org, and <http://amga.com>.

Comments

As the nation's leading national climbing advocacy organizations, we would like to express our support of this proposed rule, as it provides for increased efficiency and effectiveness in landscape restoration including the lands central to the missions of the Climbing Organizations. Our organizations lead, actively participate in, facilitate, and fund landscape restoration projects in many areas of the country, and have found that complicated and costly environmental analyses have unnecessarily hindered the completion of necessary restoration work in a timely and effective manner.

We support the limited use of Categorical Exclusions for appropriate public land management needs, especially to restore, rehabilitate, and stabilize non-system trails such as those used by climbers, sportsmen, and many other legitimate public land user groups. These CEs will allow more streamlined analyses, saving considerable time and money for Forest Service staff. These CEs will also lead to timelier and more predictable implementation of restoration projects, an important



consideration when utilizing volunteer groups and other Forest Service key partners.

Notably, these CEs provide crucial opportunities to reduce trail braiding and consolidate use onto preferred access routes in order to reduce impact at popular recreation sites. We understand that this proposed rule would not be used to make access decisions about which roads and trails are to be designated for public use, and thus expect that no new recreation access issues will arise directly from this specific proposed rulemaking. We look forward to working with the Forest Service during the scoping phase of site specific projects benefitting from these proposed CEs to inform local agency planners which areas most need restoration and which non-system routes are most important to the climbing community and should be rehabilitated or stabilized.

We applaud the Forest Service's efforts to streamline this process and believe that this is indicative of a growing effort to partner with local and national conservation and recreation advocacy groups to provide much needed stewardship to the lands we all use and love. We welcome any opportunity to provide additional input into public lands management processes including details of these proposed CEs.

Sincerely,

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The American Alpine Club