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**From:** The Wilderness Society [action@tw.s.org] on behalf of George Loveday  
[atharmony@sbbmail.com]  
**Sent:** Thursday, June 09, 2011 9:23 PM  
**To:** COcomments  
**Subject:** I support strong protections for Colorado's Roadless Areas

Jun 9, 2011

Forest Service Comment Team Forest Service Comment Team Colorado Roadless Rule/EIS P.O. Box  
1919 Sacramento, CA 95812

Dear Forest Service Comment Team Comment Team,

Please accept these written comments on the proposed rule for Colorado's roadless national forests. I urge the Forest Service to ensure that any rule be at least as protective as the National 2001 Roadless Rule, which the Obama administration has supported and defended in federal court.

To ensure that Colorado's valuable wild lands receive the level of protection they deserve, a final Colorado Rule must be significantly improved in the following ways:

- 1) Oil and Gas Leases: The proposed Colorado Rule would allow development to go forward on approximately 100 new oil and gas leases in some of Colorado's best backcountry. These "gap leases" were illegally issued by the Bush administration after the Roadless Rule was adopted in 2001. THIS IS ABSOLUTELY RIDICULOUS! Any Colorado Rule must be accompanied by an agreement that applies "no-surface occupancy" requirements for the approximately 100 oil and gas gap leases, or other guarantees that the affected roadless areas are never damaged. Also, the Colorado rule must provide for "no-surface occupancy" on all new oil and gas leases on all Forest Service roadless lands.
- 2) Logging: The proposed Colorado Rule contains an overly-broad definition of "at-risk community." The rule's proposed list includes more than 340 so-called "communities," some of which are not even located on current State maps and may no longer be inhabited. This definition of at-risk communities needs to be tightened to focus logging exemptions only where needed.
- 3) Linear Construction Zones: I disagree with the draft Colorado Rule's allowance of road building (euphemistically called "linear construction zones") for new developments. New roads of any type should not be allowed to access or develop future water facilities, nor should the "linear construction zones" be expanded to permit new transmission, utility, and telecommunication lines. Any construction corridors on roadless forests must be limited to existing rights-of-way.
- 4) Upper Tier Roadless Area Protection: Upper tier protections for roadless lands must be expanded and strengthened. The draft Colorado Rule provides enhanced "upper tier" protection for only 13% of Colorado roadless areas, despite the fact that well over half are known to provide exceptional wildlife habitat, important sources of clean drinking water for millions of downstream Americans, or unique and outstanding recreational opportunities. Further, loopholes put even the few "upper tier" roadless areas at risk from oil and gas development, pipelines, and transmission lines. A final Colorado Rule should ensure that all "upper tier" lands and other roadless lands have strict No Surface Occupancy stipulations to protect the entire roadless area from any future oil and gas leasing and development. These areas must not permit the use of "linear construction zones" to facilitate pipelines, transmission lines, or telecommunication facilities.

Thank you for this opportunity to provide comment. I support the protections embodied in the National 2001 Roadless Rule and do not support managing Colorado's National Forests to a lower standard. To ensure that any state-specific rule is at least as protective as this landmark conservation tool, a final rule needs to expand and strengthen the "upper tier" protections, must tighten the overly broad discretion that would allow logging far into the backcountry and building of "linear construction zones," and ensure that Colorado's oil and gas "gap leases" are not developed.

Colorado's remaining wildlands provide clean water, abundant wildlife, and unsurpassed recreation on a nationally recognized public landscape. They are simply too great a resource to squander. The Forest Service's management of roadless areas must match the Obama administration's commitment to strong environmental protections of roadless areas.

I'm so surprised by your agenda that it seems that you work for corporate America instead of the people of the United State. This is a blemish on your integrity.

Sincerely,

Mr. George Loveday  
18376 Harmony Pl  
Grass Valley, CA 95949-9711  
(530) 268-1589

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**From:** The Wilderness Society [action@tw.s.org] on behalf of Kimberly Kurcab [waves876@hotmail.com]  
**Sent:** Saturday, June 11, 2011 11:02 AM  
**To:** COcomments  
**Subject:** I support strong protections for Colorado's Roadless Areas

Jun 11, 2011

Forest Service Comment Team Forest Service Comment Team Colorado Roadless Rule/EIS P.O. Box 1919 Sacramento, CA 95812

Dear Forest Service Comment Team Comment Team,

I am a native Coloradan with an immense love and respect for the natural environment. I developed that at a young age because of growing up in Colorado. It is what make our state great and brings in the tourist dollars. Please don't weaken protections for our forests!

Please accept these written comments on the proposed rule for Colorado's roadless national forests. I urge the Forest Service to ensure that any rule be at least as protective as the National 2001 Roadless Rule, which the Obama administration has supported and defended in federal court.

To ensure that Colorado's valuable wild lands receive the level of protection they deserve, a final Colorado Rule must be significantly improved in the following ways:

- 1) Oil and Gas Leases: The proposed Colorado Rule would allow development to go forward on approximately 100 new oil and gas leases in some of Colorado's best backcountry. These "gap leases" were illegally issued by the Bush administration after the Roadless Rule was adopted in 2001. Any Colorado Rule must be accompanied by an agreement that applies "no-surface occupancy" requirements for the approximately 100 oil and gas gap leases, or other guarantees that the affected roadless areas are never damaged. Also, the Colorado rule must provide for "no-surface occupancy" on all new oil and gas leases on all Forest Service roadless lands.
- 2) Logging: The proposed Colorado Rule contains an overly-broad definition of "at-risk community." The rule's proposed list includes more than 340 so-called "communities," some of which are not even located on current State maps and may no longer be inhabited. This definition of at-risk communities needs to be tightened to focus logging exemptions only where needed.
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entire roadless area from any future oil and gas leasing and development. These areas must not permit the use of "linear construction zones" to facilitate pipelines, transmission lines, or telecommunication facilities.

Thank you for this opportunity to provide comment. I support the protections embodied in the National 2001 Roadless Rule and do not support managing Colorado's National Forests to a lower standard. To ensure that any state-specific rule is at least as protective as this landmark conservation tool, a final rule needs to expand and strengthen the "upper tier" protections, must tighten the overly broad discretion that would allow logging far into the backcountry and building of "linear construction zones," and ensure that Colorado's oil and gas "gap leases" are not developed.

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They are simply too great a resource to squander. The Forest Service's management of roadless areas must match the Obama administration's commitment to strong environmental protections of roadless areas.

Sincerely,

Ms. Kimberly Kurcab  
3851 Sherbourne Dr Apt 0  
Oceanside, CA 92056-3346

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**From:** Sierra Club Membership Services [membership.services@sierraclub.org] on behalf of John Hagan [phagan9@gmail.com]  
**Sent:** Sunday, June 19, 2011 4:05 AM  
**To:** COcomments  
**Subject:** Keep Colorado's Back Country Roadless!

Jun 19, 2011

Colorado Roadless Area Rule Public Comment Email CO

Dear Public Comment Email,

We visit your state most every year and have fallen in love with your mountains and scenery. Like Florida, the natural environments are a gift for people to relish. Not every square mile needs to be developed. Certainly we have learned that overdevelopment has a negative impact on our environment.

President Roosevelt realized our environment needed to be protected. We need to do this to protect the planets ecosystems and to give ourselves natural places to recreate.

I will do whatever I can to help with this effort and I look forward to enjoying your beautiful states; and Florida's if Gov. Scott dosen' t ruin it!

John P. "Pat" Hagan  
3024 West Lawn Av.  
Tampa, Florida 33611

Sincerely,

Mr. John Hagan  
3024 W Lawn Ave  
Tampa, FL 33611-1649  
(813) 985-8584

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**From:** Sky Baldwin [skybaldwin@sopris.net]  
**Sent:** Sunday, June 19, 2011 4:16 PM  
**To:** COcomments  
**Subject:** FS Roadless Rules

Dear Sirs:

I want to make my opinion heard re the draft "roadless rules" in Colorado national forests. I would strongly urge the FS to adopt Alternative 4 that proposes upper tier protection for 2.6 million acres. Why? Because in my lifetime of 62 years I have seen a significant reduction in the amount of land that is limited to no motorized vehicles. It is this undisturbed land that is so unique, so special, and so worth preserving. Once it is gone that's it. As our populations worldwide grow exponentially these quiet, undisturbed places become even more valuable. Our country still has the option to protect what little remains; many other countries don't have this luxury. Also, it is for personal reasons—I enjoy being out in the woods without the roar of a snow machine or a four wheeler bearing down on me as I ski or ride my horse through the forests. Many of the places I used to take a quiet ride on my horse are now inundated with the 4-wheelers. I resent the fact that I can't get away from noisy, mechanized vehicles that impact the land much more than I do. I don't think I am selfish; I think there should be places preserved for people like me that need quiet, beautiful forests to enjoy. Where will it stop? Will no place be holy? It looks to me that only through management decisions and policies will wild spaces get the protection needed. Sincerely, Susan M. Baldwin

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**From:** Bernie Krystyniak [bklakecity@hotmail.com]  
**Sent:** Monday, June 20, 2011 7:22 AM  
**To:** COcomments  
**Subject:** CO Roadless - Support Alternative 4

Please support alternative 4 in the CO Roadless rulemaking.

We are fortunate in CO to have some of the finest fishing, hunting, and scenic areas in the nation, if not world. But they are threatened by the advance of development and misuse by a growing group of citizens that believe they are entitled to drive anywhere they want.

We live full time in Lake City CO. I witness this movement daily as mostly well intended but uneducated visitors and locals unwittingly chip away at the pristine areas through misuse of the scenic and sporting assets. We need to create clear boundaries of protection for roadless and enforce what we have. These pristine areas can't be recreated or returned to original state. They are shrinking with the advance of those supporting mining and other industrial uses.

Many roadless candidates are home to native species and plants that are threatened, such as the native cutthroat trout species, rare insects, and plants. Wheeled travel also causes spread of non-native, invasive species such as the Canadian Thistle and others.

Roadless areas represent our last stand to protect this treasure. Our town and many others in our area rely on the scenic and sporting assets for economic survival from tourism and growth associated with tourism, hunting, and fishing.

**Please support Roadless Alternative 4.**

Thank you,  
Bernie Krystyniak  
Lake City, CO 81235

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**From:** Brad Wallis [grandcanyonwally@yahoo.com]  
**Sent:** Saturday, June 18, 2011 8:43 AM  
**To:** COcomments  
**Subject:** Colorado Roadless Areas Comment

Hello,

As a citizen of Colorado, I would like to comment regarding the proposal to relax restrictions on the public forest lands identified as roadless areas under the 2001 Roadless Rule.

In my opinion, the industrial complex has had an adequate opportunity to carve out transmission lines, mine and de-grade fragile forest, sub-alpine and alpine environments. As a society we apparently have decided that many things are critical to our continued success as a species. At some level, we are all complicit by living in homes, driving cars and consuming more and more products, yet to me, there is a point at which we should admit that our basic needs have been more than met and the time for justifying additional degradation of natural resources has past.

The lands in question have a higher social value as watersheds, wildlife habitat and places of human refuge, than the commercial value of items that can be extracted from these fragile lands.

I would request that all roadless lands identified during the evaluation process for the 2001 Roadless Rule be granted top tier protection under the law.

Thank you for the opportunity to comment.

Brad L. Wallis  
169 Ridgway Hills Rd.  
Ridgway, CO 81432

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**From:** wwhittum@springsips.com  
**Sent:** Saturday, June 18, 2011 8:10 PM  
**To:** COcomments  
**Subject:** The Conservation Alternative

To the USFS: For fifty years I have lived on the edge of the Routt National Forest, hiking, fishing, skiing, and horseback riding. And my friends and associates who come from all parts of the country have experienced the unmatched, undeveloped roadless areas of this Forest. (I should add that I have also hiked in many of the other national forests in Colorado.) Now, I hear you plan to designate only a small percentage of the 430,000 acres of roadless Colorado forest as "upper tier" and consequently protected from development by roads which will inevitably be built to service oil and gas, coal, power line, and other interests. Why is it that such a small area (can it really be as small as 24,600 acres???) deserves to be protected????

For personal reasons, I support the conservation alternative. But for economic reasons, and economic reasons have more validity than personal ones, there should be no doubt in your minds that these areas subject to development will eventually lose their prime attractiveness for the many people who have come to visit them.

So it is not just us locals who should be given consideration. The tourist industry is extremely significant to the state's well-being.

Don't just think that the "environmentalists" should be given what they want. The people who enjoy and use our forests want to keep it the way it is. Once you open it up by designating it as not subject to commercial interests, it will never retain its present value. - John Whittum

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**From:** The Wilderness Society [action@tw.s.org] on behalf of Jimmy Carrell [jcarrcat@aol.com]  
**Sent:** Saturday, June 11, 2011 3:32 PM  
**To:** COcomments  
**Subject:** I support strong protections for Colorado's Roadless Areas

Jun 11, 2011

Forest Service Comment Team Forest Service Comment Team Colorado Roadless Rule/EIS P.O. Box 1919 Sacramento, CA 95812

Dear Forest Service Comment Team Comment Team,

"Unique circumstances" (Summary p. 5) seems to be the euphemism 'du jour' for situational politics, and as such should not be considered in rule making regarding the unique characteristics of RAs.

As example communication towers and lines significantly devalue wilderness areas as I have observed in some of Colorado's national forests and in some of our national parks.

Accordingly. please accept these written comments on the proposed rule for Colorado's roadless national forests. I urge the Forest Service to ensure that any rule be at least as protective as the National 2001 Roadless Rule, which the Obama administration has supported and defended in federal court.

To ensure that Colorado's valuable and unique wild lands receive the level of protection they deserve, a final Colorado Rule must be significantly improved. in the following ways:

- 1) Oil and Gas Leases: The proposed Colorado Rule would allow development to go forward on approximately 100 new oil and gas leases in some of Colorado's best backcountry. These "gap leases" were illegally issued by the Bush administration after the Roadless Rule was adopted in 2001. Any Colorado Rule must be accompanied by an agreement that applies "no-surface occupancy" requirements for the approximately 100 oil and gas gap leases, or other guarantees that the affected roadless areas are never damaged. Also, the Colorado rule must provide for "no-surface occupancy" on all new oil and gas leases on all Forest Service roadless lands.
- 2) Logging: The proposed Colorado Rule contains an overly-broad definition of "at-risk community." The rule's proposed list includes more than 340 so-called "communities," some of which are not even located on current State maps and may no longer be inhabited. This definition of at-risk communities needs to be tightened to focus logging exemptions only where needed.
- 3) Linear Construction Zones: I disagree with the draft Colorado Rule's allowance of road building (euphemistically called "linear construction zones") for new developments. New roads of any type should not be allowed to access or develop future water facilities, nor should the "linear construction zones" be expanded to permit new transmission, utility, and telecommunication lines. Any construction corridors on roadless forests must be limited to existing rights-of-way.
- 4) Upper Tier Roadless Area Protection: Upper tier protections for roadless lands must be expanded and strengthened. The draft Colorado Rule provides enhanced "upper tier" protection for only 13% of Colorado roadless areas, despite the fact that well over half are known to provide exceptional wildlife habitat, important sources of clean drinking water for millions of downstream Americans, or unique and outstanding recreational opportunities. Further, loopholes put even the few "upper tier" roadless areas at risk from oil and gas development, pipelines, and transmission lines. A final Colorado Rule should ensure that all "upper tier"

lands and other roadless lands have strict No Surface Occupancy stipulations to protect the entire roadless area from any future oil and gas leasing and development. These areas must not permit the use of "linear construction zones" to facilitate pipelines, transmission lines, or telecommunication facilities.

Thank you for this opportunity to provide comment. I support the protections embodied in the National 2001 Roadless Rule and do not support managing Colorado's National Forests to a lower standard. To ensure that any state-specific rule is at least as protective as this landmark conservation tool, a final rule needs to expand and strengthen the "upper tier" protections, must tighten the overly broad discretion that would allow logging far into the backcountry and building of "linear construction zones," and ensure that Colorado's oil and gas "gap leases" are not developed.

Colorado's remaining wildlands provide clean water, abundant wildlife, and unsurpassed recreation on a nationally recognized public landscape.

They are simply too great a resource to squander. The Forest Service's management of roadless areas must match the Obama administration's commitment to strong environmental protections of roadless areas.

Sincerely,

Mr. Jimmy Carrell  
10971 SW 85th Ter  
Ocala, FL 34481-9702  
(352) 732-4121

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**From:** The Wilderness Society [action@tw.s.org] on behalf of Geoff Geiss [patchworkpig1@juno.com]  
**Sent:** Friday, June 10, 2011 4:30 PM  
**To:** COcomments  
**Subject:** I support strong protections for Colorado's Roadless Areas

Jun 10, 2011

Forest Service Comment Team Forest Service Comment Team Colorado Roadless Rule/EIS P.O. Box 1919 Sacramento, CA 95812

Dear Forest Service Comment Team Comment Team,

Please accept these written comments on the proposed rule for Colorado's roadless national forests. I urge the Forest Service to ensure that any rule be at least as protective as the National 2001 Roadless Rule, which the Obama administration has supported and defended in federal court.

To ensure that Colorado's valuable wild lands receive the level of protection they deserve, a final Colorado Rule must be significantly improved in the following ways:

- 1) Oil and Gas Leases: The proposed Colorado Rule would allow development to go forward on approximately 100 new oil and gas leases in some of Colorado's best backcountry. These "gap leases" were illegally issued by the Bush administration after the Roadless Rule was adopted in 2001. Any Colorado Rule must be accompanied by an agreement that applies "no-surface occupancy" requirements for the approximately 100 oil and gas gap leases, or other guarantees that the affected roadless areas are never damaged. Also, the Colorado rule must provide for "no-surface occupancy" on all new oil and gas leases on all Forest Service roadless lands.
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COR159

Thank you for this opportunity to provide comment. I support the protections embodied in the National 2001 Roadless Rule and do not support managing Colorado's National Forests to a lower standard. To ensure that any state-specific rule is at least as protective as this landmark conservation tool, a final rule needs to expand and strengthen the "upper tier" protections, must tighten the overly broad discretion that would allow logging far into the backcountry and building of "linear construction zones," and ensure that Colorado's oil and gas "gap leases" are not developed. GET OUT OF OUR WILDERNESS, MUST YOU ALL RUIN IT FOR THE ALMIGHTY DOLLAR, COME ON!!!

Colorado's remaining wildlands provide clean water, abundant wildlife, and unsurpassed recreation on a nationally recognized public landscape. They are simply too great a resource to squander. The Forest Service's management of roadless areas must match the Obama administration's commitment to strong environmental protections of roadless areas.

Sincerely,

Mr. Geoff Geiss  
555 W Main St  
Florence, CO 81226-1338  
(719) 784-7702

**From:** The Wilderness Society [action@tw.s.org] on behalf of Robert Shalit [rshalit@ne.rr.com]  
**Sent:** Friday, June 10, 2011 7:24 AM  
**To:** COcomments  
**Subject:** I support strong protections for Colorado's Roadless Areas

Jun 10, 2011

Forest Service Comment Team Forest Service Comment Team Colorado Roadless Rule/EIS P.O. Box 1919 Sacramento, CA 95812

Dear Forest Service Comment Team Comment Team,

Please accept these written comments on the proposed rule for Colorado's roadless national forests. I urge the Forest Service to ensure that any rule be at least as protective as the National 2001 Roadless Rule, which the Obama administration has supported and defended in federal court.

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CORIGO

Thank you for this opportunity to provide comment. I support the protections embodied in the National 2001 Roadless Rule and do not support managing Colorado's National Forests to a lower standard. To ensure that any state-specific rule is at least as protective as this landmark conservation tool, a final rule needs to expand and strengthen the "upper tier" protections, must tighten the overly broad discretion that would allow logging far into the backcountry and building of "linear construction zones," and ensure that Colorado's oil and gas "gap leases" are not developed.

Colorado's remaining wildlands provide clean water, abundant wildlife, and unsurpassed recreation on a nationally recognized public landscape.

They are simply too great a resource to squander. The Forest Service's management of roadless areas must match the Obama administration's commitment to strong environmental protections of roadless areas.

I also would like you to be sure to open up all trails to mountain bicycling - it has been shown in scientific studies that mountain biking is no more detrimental to wilderness trails than hiking, and much less so than horseback riding. Mountain bikers maintain trails and take care of the environment. Mountain biking allows access in a harmless way that makes young people realize that there is a lot of land that needs to be protected.

Sincerely,

Mr. Robert Shalit  
350 Water St  
Keene, NH 03431-4228  
(603) 357-3443

# **PUBLIC SUBMISSION**

<b>As of:</b> June 20, 2011
<b>Received:</b> June 14, 2011
<b>Status:</b> Draft
<b>Tracking No.</b> 80e504de
<b>Comments Due:</b> July 14, 2011
<b>Submission Type:</b> Web

**Docket:** FS\_FRDOC\_0001  
Recently Posted FS Rules and Notices.

**Comment On:** FS\_FRDOC\_0001-1051  
Special Areas; Roadless Area Conservation: Applicability to the National Forests in Colorado

**Document:** FS\_FRDOC\_0001-DRAFT-0161  
Comment on FR Doc # 2011-09119

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## **Submitter Information**

**Name:** Walt B. Blackburn  
**Address:**  
1751 Clearview Dr  
Delta, 81416-3007  
**Email:** wblack8709@msn.com  
**Phone:** 970-260-4181  
**Organization:** Thunder Mountain Wheelers ATV Club

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## **General Comment**

See attached file(s)

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## **Attachments**

roadless 2011 final .

# THUNDER MOUNTAIN WHEELERS

P O BOX 203  
 DELTA CO 81416-0203  
 970-874-8709  
[wblack8709@msn.com](mailto:wblack8709@msn.com)



Charlie Richmond  
 GMUG, Forest Supervisor

## What happened? / And / My questions are...

The Colorado Roadless Task force, which was appointed by then Governor Owens, worked extensively on the Colorado Roadless Rule. This Task Force was made up from a contingency of all user groups of the National Forest. The group traveled the State listening to the concerns of all user groups and created a comprehensive, collaboratively modern approach toward a very workable solution to manage the proposed Roadless areas. Nowhere in the last draft of the Colorado Rule was there ever mentioned or dialog of this now proposed "Upper Tier" concept. It is inconceivable that this new concept includes nearly half of the 4.2 million acres of the Colorado Roadless proposal.

## My questions are...

1. Where and how did this concept of "Upper Tier" acreage come from?
2. How were the "Upper Tier" acres identified? I have heard that the Alternative 2 (proposed action) "Upper Tier" acres on the GMUG came from a draft Forest Plan that never ever received public comment. It is absolutely wrong to use a draft plan as a foundation for these acres. *Is this correct?*
3. I have heard that the Alternative 4 "Upper Tier" acres came from 2 environmental groups that identified areas based upon their ideas on good wildlife areas and fishing streams. *Is this correct?* If so, this, without a doubt is totally inappropriate and even extends way beyond what the national roadless rule envisioned.
4. How could this new proposal possibly override the comprehensive efforts previously produced by Colorado Roadless Task Force final recommendation which including all data from all user groups?
5. If this "Upper-Tier" acreage designation can be arbitrarily & capriciously be changed from 257K acres in Alternative 2 up 1000% to 2.6 million acres in Alternative 4 without all parties' participation and input, how can this ever be a workable process or solution?

Walt Blackburn  
 Government Liaison Officer  
 Thunder Mountain Wheelers ATV Club

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**From:** The Wilderness Society [action@tw.s.org] on behalf of Barry Klein [sequoialuv@wildmail.com]  
**Sent:** Saturday, June 11, 2011 6:02 PM  
**To:** COcomments  
**Subject:** I support strong protections for Colorado's Roadless Areas

Jun 11, 2011

Forest Service Comment Team Forest Service Comment Team Colorado Roadless Rule/EIS P.O. Box 1919 Sacramento, CA 95812

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- 4) Upper Tier Roadless Area Protection: Upper tier protections for roadless lands must be expanded and strengthened. The draft Colorado Rule provides enhanced "upper tier" protection for only 13% of Colorado roadless areas, despite the fact that well over half are known to provide exceptional wildlife habitat, important sources of clean drinking water for millions of downstream Americans, or unique and outstanding recreational opportunities. Further, loopholes put even the few "upper tier" roadless areas at risk from oil and gas development, pipelines, and transmission lines. A final Colorado Rule should ensure that all "upper tier" lands and other roadless lands have strict No Surface Occupancy stipulations to protect the entire roadless area from any future oil and gas leasing and development. These areas must not permit the use of "linear construction zones" to facilitate pipelines, transmission lines, or telecommunication facilities.

CORIGA

Thank you for this opportunity to provide comment. I support the protections embodied in the National 2001 Roadless Rule and do not support managing Colorado's National Forests to a lower standard. To ensure that any state-specific rule is at least as protective as this landmark conservation tool, a final rule needs to expand and strengthen the "upper tier" protections, must tighten the overly broad discretion that would allow logging far into the backcountry and building of "linear construction zones," and ensure that Colorado's oil and gas "gap leases" are not developed.

Colorado's remaining wildlands provide clean water, abundant wildlife, and unsurpassed recreation on a nationally recognized public landscape. They are simply too great a resource to squander. The Forest Service's management of roadless areas must match the Obama administration's commitment to strong environmental protections of roadless areas.

DO THE RIGHT THING BY PROTECTING THE FORESTS, NOT THE FINANCES OF BIG CORPORATE!!! THANKS!!!

Sincerely,

Mr. Barry Klein  
PO Box 312  
Three Rivers, CA 93271-0312

---

**From:** The Wilderness Society [action@tw.s.org] on behalf of Susan Allen [sallen@hisna.com]  
**Sent:** Thursday, June 09, 2011 4:22 PM  
**To:** COcomments  
**Subject:** STRONGLY support strong protections for Colorado's Roadless Areas

Jun 9, 2011

Forest Service Comment Team Forest Service Comment Team Colorado Roadless Rule/EIS P.O. Box 1919 Sacramento, CA 95812

Dear Forest Service Comment Team Comment Team,

WE DESPARATELY NEED WILD PLACES LEFT WILD. WE ARE RUINING TOO MANY SECLUDED PLACES TO ROADS AND RECREATION VEHICLES AND THERE WILL BE NO MAGICAL PLACES LEFT IN THE TRUE WILDERNESS. PLEASE THE PLANET IS COUNTING ON YOU!!! WE NEED YOUR HELP NOW!!

PLEASE LIVE UP TO YOUR NAME AND BE OF SERVICE TOTHE FOREST!!! ;0)

PLEASE TO THE RIGHT THING FOR NATURE AND THIS PLANET.

Please accept these written comments on the proposed rule for Colorado's roadless national forests. I strongly urge the Forest Service to ensure that any rule be at least as protective as the National 2001 Roadless Rule, which the Obama administration has supported and defended in federal court.

To ensure that Colorado's valuable wild lands receive the level of protection they deserve, a final Colorado Rule must be significantly improved in the following ways:

- 1) Oil and Gas Leases: The proposed Colorado Rule would allow development to go forward on approximately 100 new oil and gas leases in some of Colorado's best backcountry. These "gap leases" were illegally issued by the Bush administration after the Roadless Rule was adopted in 2001. Any Colorado Rule must be accompanied by an agreement that applies "no-surface occupancy" requirements for the approximately 100 oil and gas gap leases, or other guarantees that the affected roadless areas are never damaged. Also, the Colorado rule must provide for "no-surface occupancy" on all new oil and gas leases on all Forest Service roadless lands.
- 2) Logging: The proposed Colorado Rule contains an overly-broad definition of "at-risk community." The rule's proposed list includes more than 340 so-called "communities," some of which are not even located on current State maps and may no longer be inhabited. This definition of at-risk communities needs to be tightened to focus logging exemptions only where needed.
- 3) Linear Construction Zones: I disagree with the draft Colorado Rule's allowance of road building (euphemistically called "linear construction zones") for new developments. New roads of any type should not be allowed to access or develop future water facilities, nor should the "linear construction zones" be expanded to permit new transmission, utility, and telecommunication lines. Any construction corridors on roadless forests must be limited to existing rights-of-way.
- 4) Upper Tier Roadless Area Protection: Upper tier protections for roadless lands must be expanded and strengthened. The draft Colorado Rule provides enhanced "upper tier" protection for only 13% of Colorado roadless areas, despite the fact that well over half are known to provide exceptional wildlife habitat, important sources of clean drinking water for millions

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of downstream Americans, or unique and outstanding recreational opportunities. Further, loopholes put even the few "upper tier" roadless areas at risk from oil and gas development, pipelines, and transmission lines. A final Colorado Rule should ensure that all "upper tier" lands and other roadless lands have strict No Surface Occupancy stipulations to protect the entire roadless area from any future oil and gas leasing and development. These areas must not permit the use of "linear construction zones" to facilitate pipelines, transmission lines, or telecommunication facilities.

Thank you for this opportunity to provide comment. I support the protections embodied in the National 2001 Roadless Rule and do not support managing Colorado's National Forests to a lower standard. To ensure that any state-specific rule is at least as protective as this landmark conservation tool, a final rule needs to expand and strengthen the "upper tier" protections, must tighten the overly broad discretion that would allow logging far into the backcountry and building of "linear construction zones," and ensure that Colorado's oil and gas "gap leases" are not developed.

Colorado's remaining wildlands provide clean water, abundant wildlife, and unsurpassed recreation on a nationally recognized public landscape. They are simply too great a resource to squander. The Forest Service's management of roadless areas must match the Obama administration's commitment to strong environmental protections of roadless areas.

Sincerely,

Miss Susan Allen  
25761 Le Parc Unit 94  
Lake Forest, CA 92630-5940

# PUBLIC SUBMISSION

<b>As of:</b> June 20, 2011
<b>Received:</b> June 16, 2011
<b>Status:</b> Draft
<b>Tracking No.</b> 80e5128f
<b>Comments Due:</b> July 14, 2011
<b>Submission Type:</b> Web

**Docket:** FS\_FRDOC\_0001  
Recently Posted FS Rules and Notices.

**Comment On:** FS\_FRDOC\_0001-1051  
Special Areas; Roadless Area Conservation: Applicability to the National Forests in Colorado

**Document:** FS\_FRDOC\_0001-DRAFT-0164  
Comment on FR Doc # 2011-09119

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## Submitter Information

**Name:** James Francis O'Malley  
**Address:**  
2918 E7/8 Road  
Grand Junction, CO, 81504  
**Email:** grcomalley@bresnan.net  
**Phone:** 970-985-4501  
**Fax:** 970-985-4358  
**Organization:** Americans With Disabilities Act

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## General Comment

The Roadless Rules proposed by State and Federal agencies violate the American With Disabilities Act. The reality is simple, your rules violate the very statues you enforce regarding access to public locations.

Americans with disabilities can no longer access public lands through mechanized equipment that was accessible in the past. You have, in fact, violated your own laws with these rules.

These comments, along with additional specific issues, will be shared with legal organizations representing victims of violators of the ADA.

Additional information has already been sent to Representative Tipton (copy attached).

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## Attachments

Tipton Ltr 6-11

CORIG

**James F. O'Malley**

**Janis D. O'Malley**

2918 E 7/8 Road • Grand Junction, CO 81504  
(970) 985-4501 • [grcomalley@bresnan.net](mailto:grcomalley@bresnan.net)

January 30, 2011

Honorable Scott Tipton, Congressman  
House of Representatives  
218 Cannon HOB  
Washington, DC 20515

Dear Congressman Tipton:

In January of this year I wrote your office regarding the ongoing "land grab" of the Obama Administration. In the past five months I have noticed more and more arrogance and determination of local Federal agencies in the denial of access to public lands.

The latest violation of American's rights is going on in the Paonia Ranger District of the Gunnison National Forest. Staff of the Ranger District has decided to lock-off access to most of the roads and ATV trails that branch off the Stephenson's Gulch Road. These roads have been available to jeeps, ATVs, horses, and foot traffic since the start of time. After talking with local seniors, it was found that these roads and trails have been used for recreation, fishing, hunting and hiking for decades. All of this access will be lost if a couple of public employees have their way.

The Ranger District can't give any viable reason for closing the roads, other than the Federal "Roadless Rule" established to lock up more and more public lands. Liberal environmentalists are trying to say the denial of access will enhance the "economy" of Colorado. Others are saying these public lands belong to everyone, not just the few that live in the region. Now, I personally find both explanations ludicrous to say the least.

This is nothing more than the next chapter in the Obama Land Grab attempt. I am asking that you and your colleagues in Congress call for a full disclosure investigation of these local policies and the abuse of power. If Colorado wants to see some impact on its economy, run all the hunters off of the land for a year or two. Thank you for your consideration of my concerns. Please keep me advised of your progress.

Sincerely,

James F. O'Malley

# PUBLIC SUBMISSION

<b>As of:</b> June 20, 2011
<b>Received:</b> June 15, 2011
<b>Status:</b> Draft
<b>Tracking No.</b> 80e50b77
<b>Comments Due:</b> July 14, 2011
<b>Submission Type:</b> Web

**Docket:** FS\_FRDOC\_0001  
Recently Posted FS Rules and Notices.

**Comment On:** FS\_FRDOC\_0001-1051  
Special Areas; Roadless Area Conservation: Applicability to the National Forests in Colorado

**Document:** FS\_FRDOC\_0001-DRAFT-0162  
Comment on FR Doc # 2011-09119

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## Submitter Information

**Name:** John H Schuenemeyer  
**Address:**  
960 Sligo St.  
Cortez, CO, 81321-2558  
**Email:** jackswsc@q.com

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## General Comment

I support Alternative 4 with the rules as proposed being my second choice. It is important that we preserve public land for future generations and allow for use by hikers.

# PUBLIC SUBMISSION

<b>As of:</b> June 20, 2011
<b>Received:</b> June 16, 2011
<b>Status:</b> Draft
<b>Tracking No.</b> 80e5128b
<b>Comments Due:</b> July 14, 2011
<b>Submission Type:</b> Web

**Docket:** FS\_FRDOC\_0001  
Recently Posted FS Rules and Notices.

**Comment On:** FS\_FRDOC\_0001-1051  
Special Areas; Roadless Area Conservation: Applicability to the National Forests in Colorado

**Document:** FS\_FRDOC\_0001-DRAFT-0163  
Comment on FR Doc # 2011-09119

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## Submitter Information

**Name:** Brandon Siegfried  
**Address:**  
Grand Junction, CO,

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## General Comment

Please leave all the roads and ATV trails open in our National Forrests. The aging hunting and outdoor generation is going to need access in the future. I've watched you guys close down so many established(but not designated) ATV trails in the past 5 years that I rarely use my ATV anymore. The average age of a hunter is 52 and its going up, how many 60 year olds are going to pack into the mountains 2-5 miles without a horse. Yes = most people don't own horses and this will probably remain true.

What about the handicapped and elderly folks in wheel chairs maybe they'd like to get off the highway once in a while and go for a drive in the back country.

It is very frustrating watch our access being ripped away. In my opinion the only people/things that have good access to public lands anymore are gas companies and cattle.

# PUBLIC SUBMISSION

<b>As of:</b> June 20, 2011
<b>Received:</b> June 16, 2011
<b>Status:</b> Draft
<b>Tracking No.</b> 80e517a2
<b>Comments Due:</b> July 14, 2011
<b>Submission Type:</b> Web

**Docket:** FS\_FRDOC\_0001  
Recently Posted FS Rules and Notices.

**Comment On:** FS\_FRDOC\_0001-1051  
Special Areas; Roadless Area Conservation: Applicability to the National Forests in Colorado

**Document:** FS\_FRDOC\_0001-DRAFT-0165  
Comment on FR Doc # 2011-09119

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## Submitter Information

**Name:** James Albert Gesick  
**Address:**  
16881 Riverview Ct.  
Montrose, CO, 81403-7484  
**Email:** jgesick@bresnan.net  
**Phone:** 970-240-1168  
**Fax:** 970-240-1168  
**Government Agency Type:** Federal  
**Government Agency:** FS

---

## General Comment

The proposed Colorado roadless rule is better than some previous proposals because it does allow more development and it does restrict less area, but it still is an encroachment on the public access to public lands. Public lands should be managed in the most efficient way to provide equal access to all of the public not just the anointed few as many of the environmental groups would like to have it. The environmental purists essentially want the lands to be their private playgrounds. The more public lands that are taken out of access for natural resources development the less fee income they will generate and the more general tax dollars will be required for their administration. It also deprives the nation of critically needed resources for the benefit of the few that are physically capable of going into roadless areas for recreation to no economic benefit to the public at large – this is not what public land administration should be about. We already have far too much “wilderness area” in this nation that is off limits to natural resource development and recreational activity to all but the very physically fit so we do not need more roadless areas – we need less.

Areas that are of particular or unique scenic beauty should be made state or federal parks to protect them for equal enjoyment of future generations, but otherwise the public lands should be managed for their most economical use provided that economical development does not unduly restrict the general public from the recreational use that is also a public good. Additional roadless areas in non-park settings is not consistent with proper management of public lands.

# PUBLIC SUBMISSION

<b>As of:</b> June 20, 2011
<b>Received:</b> June 20, 2011
<b>Status:</b> Draft
<b>Tracking No.</b> 80e68ef8
<b>Comments Due:</b> July 14, 2011
<b>Submission Type:</b> Web

**Docket:** FS\_FRDOC\_0001  
Recently Posted FS Rules and Notices.

**Comment On:** FS\_FRDOC\_0001-1051  
Special Areas; Roadless Area Conservation: Applicability to the National Forests in Colorado

**Document:** FS\_FRDOC\_0001-DRAFT-0167  
Comment on FR Doc # 2011-09119

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## Submitter Information

**Name:** James Clllyde Free  
**Address:**  
14920 6000 Road  
Montrose, CO, 81401  
**Email:** jcfree2@msn.com  
**Phone:** 970-275-0752

---

## General Comment

CO Roadless Rule: I select Alternative 2 without the Upper Tier Acre designation.

Comment: Upper Tier Acre Designation only adds another layer of rules on an all ready complicated landscape of rules. The land managers will need another manuel just to implement this concept. The cost to the tax payers is not worth this new designation. Just treating invasive species in this area will cost thousands of dollars. We have not been able to fund wilderness management (poor trials, no erosion control, no signage, no weed control, no enforcement). These acres need management for fuels, WUI, wildlife, woody biomass, range, weeds; do not complicate management and costs by putting another burden on the land managers.

No more locking up acres into some designation that restricts our ability to manage for the future.  
thanks You

# PUBLIC SUBMISSION

<b>As of:</b> June 20, 2011
<b>Received:</b> June 20, 2011
<b>Status:</b> Draft
<b>Tracking No.</b> 80e68f0b
<b>Comments Due:</b> July 14, 2011
<b>Submission Type:</b> Web

**Docket:** FS\_FRDOC\_0001  
Recently Posted FS Rules and Notices.

**Comment On:** FS\_FRDOC\_0001-1051  
Special Areas; Roadless Area Conservation: Applicability to the National Forests in Colorado

**Document:** FS\_FRDOC\_0001-DRAFT-0168  
Comment on FR Doc # 2011-09119

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## Submitter Information

**Name:** Cheryl Ann Free  
**Address:**  
14920 6000 Road  
Montrose, CO, 81401  
**Email:** free@montrose.net  
**Phone:** 970-240-4055

---

## General Comment

Preferred alternative for CRR alternative 2 without the Upper Tier Acre Designation. Upper Tier Acres is a bad idea. Cost to implement and cost of future problems makes this a bad concept. Approve the CO Roadless Rule without Upper Tier Acres. Upper Tier Acres only complicates management. We need to manage the lands not lock them up and let mother nature management them. Have we not learned something from all the insect, invasive species, disease and fires that we have today.

Upper Tier Acres cost more to manage for tax payers, and removes future opportunities. Do Not support this concept. thank you.

**From:** Marilyn McCaulley [marilynmccaulley@gmail.com]  
**Sent:** Tuesday, June 14, 2011 3:48 PM  
**To:** COcomments  
**Subject:** keep our backcountry roadless

Please be sensitive to our beautiful backcountry and abundant wildlife by keeping it roadless! We want to enjoy the pristine, quiet atmosphere. There are plenty of places to drive, and not near enough that are quiet and preserved.

Marilyn and Mark McCaulley,  
Steamboat Springs, CO.

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**From:** The Wilderness Society [action@tw.s.org] on behalf of Mary Ann Gardner [mag01@comcast.net]  
**Sent:** Saturday, June 11, 2011 1:32 PM  
**To:** COcomments  
**Subject:** I support strong protections for Colorado's Roadless Areas

Jun 11, 2011

Forest Service Comment Team Forest Service Comment Team Colorado Roadless Rule/EIS P.O. Box 1919 Sacramento, CA 95812

Dear Forest Service Comment Team Comment Team,

After living in Boulder at the foot of the Flatirons for eleven years, naturally I developed a deep respect and affection for the Rocky Mountains. I quickly learned how sensitive high-altitude lands are to the slightest disruptions in their ecosystems.

As Colorado became more and more a vacation destination and natural-resource site, Coloradans became more devoted to preserving and carefully managing their unique environments.

Feeling very much the Coloradan here, I join others in urging the Forest Service to ensure that any rule be at least as protective as the National 2001 Roadless Rule, which the Obama administration has supported and defended in federal court.

To ensure that Colorado's valuable wildlands receive the level of protection they require, a final Colorado Rule must be significantly improved in the following ways:

- 1) Oil and Gas Leases: The proposed Colorado Rule would allow development to go forward on approximately 100 new oil and gas leases in some of Colorado's best backcountry. These "gap leases" were illegally issued by the Bush administration after the Roadless Rule was adopted in 2001. Any Colorado Rule must be accompanied by an agreement that applies "no-surface occupancy" requirements for the approximately 100 oil and gas gap leases, or other guarantees that the affected roadless areas are never damaged. Also, the Colorado rule must provide for "no-surface occupancy" on all new oil and gas leases on all Forest Service roadless lands.
- 2) Logging: The proposed Colorado Rule contains an overly broad definition of "at-risk" community. The rule's proposed list includes more than 340 so-called "communities," some of which are not even located on current state maps and may no longer be inhabited. This definition of at-risk communities needs to be tightened to focus logging exemptions only where needed.
- 3) Linear Construction Zones: I disagree with the draft Colorado Rule's allowance of road building (euphemistically called "linear construction zones") for new developments. New roads of any type should not be allowed to access or develop future water facilities, nor should the "linear construction zones" be expanded to permit new transmission, utility, and telecommunication lines. Any construction corridors on roadless forests must be limited to existing rights-of-way.
- 4) Upper Tier Roadless Area Protection: Upper tier protections for roadless lands must be expanded and strengthened. The draft Colorado Rule provides enhanced "upper tier" protection for only 13% of Colorado roadless areas, despite the fact that well over half are known to provide exceptional wildlife habitat, important sources of clean drinking water for millions of downstream Americans, or unique and outstanding recreational opportunities. Further, loopholes put even the few "upper tier" roadless areas at risk from oil and gas development,

COR171

pipelines, and transmission lines. A final Colorado Rule should ensure that all "upper tier" lands and other roadless lands have strict No Surface Occupancy stipulations to protect the entire roadless area from any future oil and gas leasing and development. These areas must not permit the use of "linear construction zones" to facilitate pipelines, transmission lines, or telecommunication facilities.

Thank you for this opportunity to provide comment. I support the protections embodied in the National 2001 Roadless Rule and do not support managing Colorado's National Forests to a lower standard. To ensure that any state-specific rule is at least as protective as this landmark conservation tool, a final rule needs to expand and strengthen the "upper tier" protections, must tighten the overly broad discretion that would allow logging far into the backcountry and building of "linear construction zones," and ensure that Colorado's oil and gas "gap leases" are not developed.

Colorado's remaining wildlands provide clean water, abundant wildlife, and unsurpassed recreation on a nationally recognized public landscape. They are simply too great a resource to squander--and too fragile to put at risk. The Forest Service's management of roadless areas must match the Obama administration's commitment to strong environmental protections of roadless areas.

Sincerely,

Ms. Mary Ann Gardner  
3900 W Tulare Ave  
Apt 48  
Visalia, CA 93277-1741

**From:** Leslie Madsen & Paul Kluck [madklucksen@msn.com]  
**Sent:** Thursday, June 23, 2011 8:35 AM  
**To:** COcomments  
**Subject:** draft proposal roadless areas

To the The Obama administration and the U.S. Forest Service:

For Pete's sake, PLEASE ensure that Colorado has the same protections afforded in the 2001 National Forest Roadless Rule, which the majority of states abide by!!!!

Places such as the Clear Fork Divide roadless area between McClure Pass and Sunlight Ski Area, Kelso Mesa on the Uncompahgre Plateau above Escalante Canyon, and Kannah Creek (a Grand Junction watershed) need to be included in the "upper tier" roadless areas.

Let's not revert back to the Bush Administration's roll back of environmental protections. Protect our roadless areas now!!

Leslie Madsen  
1150 Hudson St.  
Denver, CO  
303 377 9028

**From:** Tom Sykes [tsykes@swhealth.org]  
**Sent:** Thursday, June 23, 2011 7:27 AM  
**To:** COcomments  
**Subject:** Roadless Rule

Hello, I am a hunter, angler and Backpacker from Dolores, Co. I prefer alternative #4. I think our Roadless Rule should be even stronger than the 2001 rule. I would also like to see the western part of the Hermosa Creek Roadless Area ( Bear Creek) get "upper tier" protection. Thank you Tom Sykes, PO Box 1122 Dolores, Co. 81323.

## PUBLIC SUBMISSION

<b>As of:</b> June 27, 2011
<b>Received:</b> June 22, 2011
<b>Status:</b> Draft
<b>Category:</b> NA
<b>Tracking No.</b> 80e95aec
<b>Comments Due:</b> July 14, 2011
<b>Submission Type:</b> Web

**Docket:** FS\_FRDOC\_0001  
Recently Posted FS Rules and Notices.

**Comment On:** FS\_FRDOC\_0001-1051  
Special Areas; Roadless Area Conservation: Applicability to the National Forests in Colorado

**Document:** FS\_FRDOC\_0001-DRAFT-0172  
Comment on FR Doc # 2011-09119

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### Submitter Information

**Name:** George William Wilkinson  
**Address:**  
8900-A Independence Way,  
Alamosa, Colorado, 81101  
**Email:** gwilkinson@alamosacounty.org  
**Phone:** (719)589-4848  
**Fax:** (719)589-1900  
**Organization:** Alamosa County  
**Government Agency Type:** Local

---

### General Comment

As Vice-chairman for Public Lands representing CCI & a Alamosa County Commissioner. I'm totally opposed to the roadless rule in Colorado. With the Wilderness areas, Roadless rule areas, and you working on the Wild Lands this totally closes public lands to a multiple use status. WHAT HAPPENED TO ADA? You are saving us to death. With no local control other than your agencies that are making the decisions. In some cases it is devastating to the economic sustainability of areas that have public lands.

# **PUBLIC SUBMISSION**

<b>As of:</b> June 27, 2011
<b>Received:</b> June 23, 2011
<b>Status:</b> Draft
<b>Tracking No.</b> 80ea45df
<b>Comments Due:</b> July 14, 2011
<b>Submission Type:</b> Web

**Docket:** FS\_FRDOC\_0001  
Recently Posted FS Rules and Notices.

**Comment On:** FS\_FRDOC\_0001-1051  
Special Areas; Roadless Area Conservation: Applicability to the National Forests in Colorado

**Document:** FS\_FRDOC\_0001-DRAFT-0174  
Comment on FR Doc # 2011-09119

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## **Submitter Information**

**Name:** Kim Kokesh  
**Address:**  
Austin, CO, 81410

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## **General Comment**

I am in favor of a modified Alternative 2. I am absolutely against designating any areas as "Upper Tier" in Alternative 2.

I request that the Currant Creek Area be included in the North Fork Mining Area thus returning the mining area to 29,000 acres.

I do not believe it is necessary to have the Regional Forester approve a Linear Construction Zone in a Roadless Area. That decision should be left to the Forest Supervisor of the affected Forest.

Communities should have the right to protect themselves before, during and after a wildfire event regardless if they have a CWPP in place or not. Communities should not be restricted on performing a fuels treatment program.

The 2011 Rule should allow for the construction and or maintenance of existing and future water conveyance structures by both pre-existing and new water court decrees.

# PUBLIC SUBMISSION

<b>As of:</b> June 27, 2011
<b>Received:</b> June 23, 2011
<b>Status:</b> Draft
<b>Category:</b> NA
<b>Tracking No.</b> 80ead3c4
<b>Comments Due:</b> July 14, 2011
<b>Submission Type:</b> Web

**Docket:** FS\_FRDOC\_0001  
Recently Posted FS Rules and Notices.

**Comment On:** FS\_FRDOC\_0001-1051  
Special Areas; Roadless Area Conservation: Applicability to the National Forests in Colorado

**Document:** FS\_FRDOC\_0001-DRAFT-0176  
Comment on FR Doc # 2011-09119

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## Submitter Information

**Name:** Jack Cover  
**Address:**  
602 Munro St.  
Delta, 81416  
**Email:** jjcovershp@gmail.com  
**Phone:** 970-874-87454

---

## General Comment

The proposal that as much as half of the GMUG National Forest could be made road-less is so far out of the realm of reasonableness that I can't believe it is even being considered. This cannot be allowed to happen. This would restrict many of our "Senior" population from enjoying the National Forest by motorized vehicle on already existing roads and or trail. I would also have a serious negative economic effect. Colorado needs the resources that the National Forests can provide and many people such as myself greatly enjoy visiting the Forests by ATV. We are long past the time when motorized users could travel anywhere. We are now restricted to established roads and trails and I am all in agreement with that. We are doing no harm to the environment and we have a great time enjoying the Forests. This proposal is extreme and over the edge, it must not be allowed to take effect. If that would be its effect on the GMUG, I am sure it would have a similar negative effect on the other Forests in Colorado too. Stop the rule!



**COR177.**

**BOARD OF COMMISSIONERS**

**JUN 27 2011**

**JAMES L. NEWBERRY**  
District I, Winter Park 80482  
**NANCY STUART**  
District II, Granby 80446  
**GARY BUMGARNER**  
District III, Kremmling, 80459

E-Mail: [grndcty1@co.grand.co.us](mailto:grndcty1@co.grand.co.us)  
PHONE: 970/725-3347  
Fax: 970/725-0565  
**LURLINE UNDERBRINK CURRAN**  
County Manager  
**ANTHONY J. DICOLA**  
County Attorney

June 14, 2011

United States Forest Service  
Colorado Roadless Rule/EIS  
PO Box 1919  
Sacramento CA 95812

To whom it may concern;

Grand County strongly opposes any roadless designations within the boundaries of Grand County. Maintaining current levels, let alone increasing roadless designated acres will impede our ability to effectively manage the forests in and around our communities; restrict accessibility for any emergency operations; and most importantly create a significant loss in the tourism dollars that drive our local economies.

Grand County has been the epicenter of the mountain pine beetle epidemic. The beetle has destroyed upwards of 90% of the mature pines in our predominately lodgepole pine forests. As the forest that surround our towns, subdivisions and homes turns from red to grey most residents understand and expect mitigation work to continue and expand. As of spring 2011, nearly two-thirds of the private forested acres in this county have been mitigated to some level. Unfortunately this is not the case with adjacent federal lands. With the current Roadless Rule being suspended, the Arapaho Roosevelt National Forest is operating under their 1997 Forest Plan and the Medicine Bow Routt National Forest is operating under the Interim Directive by Secretary of Agriculture Vilsack; neither of which address the existing devastated condition of our forests. The current plans and the proposed Roadless Rule effectively take these acres off the table for management due to added costs and controversy.

Grand County does not feel any Roadless Rule is presently appropriate. Placing additional acreage under further restrictions removes cost-effective management tools for improving overall forest health. Only 32% of our county is under private ownership. Over 62% of Grand County land is federally managed; approximately 41% is under United States Forest Service (USFS) management and already 115,330 acres (19%) of UFSF managed land is locked under wilderness or special protection designation which essentially stops active management. Grand County feels the roadless designated acres, especially the Upper Tier Designation, is a cost cutting arrangement to cover the current reduction in land management funding. A cut in management funding should not result in so many areas becoming "unmanageable."

Grand County, along with other communities located in mountain pine beetle impacted ecosystems, are left particularly vulnerable from the lack of active past management. In 2003 Congress passed the Healthy Forest Restoration Act (HFRA) *to encourage more local control to maintain or restore ecosystem composition, structure and processes within the historic range of variability that would be expected to occur under natural disturbance regimes of the current climatic period.* As no two forests are exactly alike, local decisions and local action is needed to improve the current decadent and diseased state of our forests. Grand County believes that the proposed Colorado Roadless Rule contradicts the spirit and intent of the HFRA by further restricting active management opportunities and driving up costs to manage the areas of forest designated "roadless".

With so much standing dead timber, the next thirty years are crucial for residents living, working and recreating in these forests because of the potential for catastrophic wildland fire. As a community we need to move towards more potential forest management and mitigation opportunities, not place greater restrictions and reduce beneficial management practices. Performing mitigation work is already costly, additional restrictions for access to forested acres, many of which are located adjacent to existing subdivisions and county roadways will increase mitigation costs exponentially and is effectively removing these acres from treatment. Additionally the ability to maintain current roads and access into these areas is essential for emergency operations to include search and rescue and evacuation of backcountry enthusiasts in the event of a wildland fire.

Grand County's economy, as are many other communities located near USFS lands, is heavily dependent on the tourism industry. A large portion of these tourism dollars evolve around hunting, fishing, and off highway vehicles (OHV). The amount of recreational users to our forest lands is ever increasing and restricting access to significant areas within our public lands not only hurts the overall experience of all users it hurts the surrounding local businesses and reduces associated jobs that depend on this market. Federal lands are owned by every American. Closing off access to greater areas to the majority of users discriminates against a population that contributes the most to the local economy. Many lifetime residents are now senior's citizens and some no longer have the ability to hike the areas they enjoyed in their youth. Restricting the access to our public lands will deprive many seniors the ability to enjoy the USFS lands that have become a big part of their lives while living in Grand County and Colorado. Grand County has always believed that multi-use is the best way to use public lands. Roadless designation does not support multi-use.

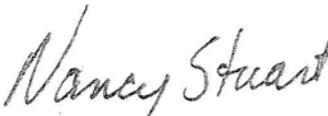
The forest should be a dynamic and diverse environment that is resilient and healthy. A healthy forest creates and sustains a vigorous local economy by attracting both permanent residents and tourist to an area. Now that many communities are located within the wildland urban interface, it is more important than ever to maintain forest health. The natural wildfire regimes have been halted and can no longer naturally sustain the health

and diversity of the forests. Active management of this land is crucial and mitigation work must be the force that creates the resilient forest. Closing off additional large areas to potential mitigation work will perpetuate the cycle for large scale wildland fire. Grand County would encourage the USFS and the State of Colorado to keep all appropriate areas open to potential treatment and improvement. The future health and resilience of the forest and the communities that depend upon the forest require it.

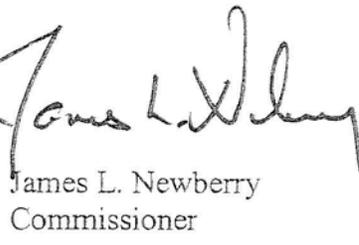
Sincerely,



Gary Bumgarner  
Commissioner Chairman



Nancy Stuart  
Commissioner



James L. Newberry  
Commissioner

cc: Craig Magwire, Arapaho Roosevelt  
Mike Wright, Medicine Bow Routt  
Bill Clark  
Trevor Denney  
Jennifer Scott



BOARD OF COMMISSIONERS  
P.O. BOX 264  
HOT SULPHUR SPRINGS, CO 80451-0264

JUN 27 2011



COR177

United States Forest Service  
Colorado Roadless Rule/EIS  
PO Box 1919  
Sacramento CA 95812

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# PUBLIC SUBMISSION

<b>As of:</b> June 27, 2011
<b>Received:</b> June 23, 2011
<b>Status:</b> Draft
<b>Tracking No.</b> 80e9bde
<b>Comments Due:</b> July 14, 2011
<b>Submission Type:</b> Web

**Docket:** FS\_FRDOC\_0001  
Recently Posted FS Rules and Notices.

**Comment On:** FS\_FRDOC\_0001-1051  
Special Areas; Roadless Area Conservation: Applicability to the National Forests in Colorado

**Document:** FS\_FRDOC\_0001-DRAFT-0173  
Comment on FR Doc # 2011-09119

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## Submitter Information

**Name:** BRIAN CONNER

**Address:**

149 Sandy Hill Rd  
La Follette, 37766-5428

**Email:** bconnel@tva.gov

**Submitter's Representative:** Theodore Roosevelt Conservatin Partnership

---

## General Comment

I am a sportsman who cares deeply about quality fish and wildlife habitat and the future of hunting and fishing on national forest lands in Colorado. The 4.2 million acres of backcountry roadless areas in the Centennial State provide important habitat for numerous big-game species and wild trout. Please consider my comments on the proposed Colorado roadless rule.

More than 259,000 hunters and 660,000 anglers take to Colorado's woods and waters every year. With untold miles of Gold Medal streams and more elk and mule deer than any other state, Colorado is a sportsmen's paradise. Responsible management of roadless backcountry is necessary to safeguard our outdoor legacy.

Specifically, I ask that the 2.6 million acre upper tier category of lands proposed in Alternative 4 be incorporated into the Preferred Alternative in the final rule. The upper tier category provides additional certainty for backcountry lands that have been identified as being of highest value. The lands included in Alternative 4 were originally recommended for upper tier by the hunting and fishing community because they have outstanding fish and wildlife values, receive considerable use by sportsmen and provide high-quality recreational experiences.

I request that the loopholes in the Colorado roadless rule be closed. Transmission corridors,

CORIF0

pipelines and water projects do not belong in our highest-quality lands, and the upper tier linear construction zone exception should be eliminated. I also request that a more balanced approach be taken for oil and gas development. Modern technologies allow for directional drilling, and "no surface occupancy" requirements should be incorporated into the rule to allow development but ensure that it is done in a way that safeguards the surface values of roadless areas.

Thank you for considering my comments on the Colorado roadless rule.

---

**From:** The Wilderness Society [action@tw.s.org] on behalf of Monica Jackson [antiam3@yahoo.com]  
**Sent:** Friday, June 10, 2011 8:54 AM  
**To:** COcomments  
**Subject:** I support strong protections for Colorado's Roadless Areas

Jun 10, 2011

Forest Service Comment Team Forest Service Comment Team Colorado Roadless Rule/EIS P.O. Box 1919 Sacramento, CA 95812

Dear Forest Service Comment Team Comment Team,

Please accept these written comments on the proposed rule for Colorado's roadless national forests. I urge the Forest Service to ensure that any rule be at least as protective as the National 2001 Roadless Rule, which the Obama administration has supported and defended in federal court.

To ensure that Colorado's valuable wild lands receive the level of protection they deserve, a final Colorado Rule must be significantly improved in the following ways:

- 1) Oil and Gas Leases: The proposed Colorado Rule would allow development to go forward on approximately 100 new oil and gas leases in some of Colorado's best backcountry. These "gap leases" were illegally issued by the Bush administration after the Roadless Rule was adopted in 2001. Any Colorado Rule must be accompanied by an agreement that applies "no-surface occupancy" requirements for the approximately 100 oil and gas gap leases, or other guarantees that the affected roadless areas are never damaged. Also, the Colorado rule must provide for "no-surface occupancy" on all new oil and gas leases on all Forest Service roadless lands.
- 2) Logging: The proposed Colorado Rule contains an overly-broad definition of "at-risk community." The rule's proposed list includes more than 340 so-called "communities," some of which are not even located on current State maps and may no longer be inhabited. This definition of at-risk communities needs to be tightened to focus logging exemptions only where needed.
- 3) Linear Construction Zones: I disagree with the draft Colorado Rule's allowance of road building (euphemistically called "linear construction zones") for new developments. New roads of any type should not be allowed to access or develop future water facilities, nor should the "linear construction zones" be expanded to permit new transmission, utility, and telecommunication lines. Any construction corridors on roadless forests must be limited to existing rights-of-way.
- 4) Upper Tier Roadless Area Protection: Upper tier protections for roadless lands must be expanded and strengthened. The draft Colorado Rule provides enhanced "upper tier" protection for only 13% of Colorado roadless areas, despite the fact that well over half are known to provide exceptional wildlife habitat, important sources of clean drinking water for millions of downstream Americans, or unique and outstanding recreational opportunities. Further, loopholes put even the few "upper tier" roadless areas at risk from oil and gas development, pipelines, and transmission lines. A final Colorado Rule should ensure that all "upper tier" lands and other roadless lands have strict No Surface Occupancy stipulations to protect the entire roadless area from any future oil and gas leasing and development. These areas must not permit the use of "linear construction zones" to facilitate pipelines, transmission lines, or telecommunication facilities.

Thank you for this opportunity to provide comment. I support the protections embodied in the National 2001 Roadless Rule and do not support managing Colorado's National Forests to a lower standard. To ensure that any state-specific rule is at least as protective as this landmark conservation tool, a final rule needs to expand and strengthen the "upper tier" protections, must tighten the overly broad discretion that would allow logging far into the backcountry and building of "linear construction zones," and ensure that Colorado's oil and gas "gap leases" are not developed.

Colorado's remaining wildlands provide clean water, abundant wildlife, and unsurpassed recreation on a nationally recognized public landscape.

They are simply too great a resource to squander. The Forest Service's management of roadless areas must match the Obama administration's commitment to strong environmental protections of roadless areas. LEAVE OUR FOREST ALONE YOU HAVE NO RIGHT YOU MUST NOT LIKE YOUR OFFICE VERY MUCH YOU DO THIS YOUR DAYS IN POLITICS ARE OVER AMERICA IS SICK AND TIRED OF THE RASH AND GREEDY STUPID DECISIONS OVER OUR LANDS

Sincerely,

Ms. Monica Jackson  
950 Temple Hills Dr  
Laguna Beach, CA 92651-2637  
(949) 494-3306

**From:** The Wilderness Society [action@tw.s.org] on behalf of Kathleen Simmons [sanctuary19@verizon.net]  
**Sent:** Thursday, June 09, 2011 6:22 PM  
**To:** COcomments  
**Subject:** I support strong protections for Colorado's Roadless Areas

Jun 9, 2011

Forest Service Comment Team Forest Service Comment Team Colorado Roadless Rule/EIS P.O. Box 1919 Sacramento, CA 95812

Dear Forest Service Comment Team Comment Team,

There is a problem in this United States when a group takes it upon themselves to make new rules. The wild forests of this United States belongs to all of the citizens not to the forest service to change rules when they see fit.

Please accept these written comments on the proposed rule for Colorado's roadless national forests. I urge the Forest Service to ensure that any rule be at least as protective as the National 2001 Roadless Rule, which the Obama administration has supported and defended in federal court.

To ensure that Colorado's valuable wild lands receive the level of protection they deserve, a final Colorado Rule must be significantly improved in the following ways:

- 1) Oil and Gas Leases: The proposed Colorado Rule would allow development to go forward on approximately 100 new oil and gas leases in some of Colorado's best backcountry. These "gap leases" were illegally issued by the Bush administration after the Roadless Rule was adopted in 2001. Any Colorado Rule must be accompanied by an agreement that applies "no-surface occupancy" requirements for the approximately 100 oil and gas gap leases, or other guarantees that the affected roadless areas are never damaged. Also, the Colorado rule must provide for "no-surface occupancy" on all new oil and gas leases on all Forest Service roadless lands.
- 2) Logging: The proposed Colorado Rule contains an overly-broad definition of "at-risk community." The rule's proposed list includes more than 340 so-called "communities," some of which are not even located on current State maps and may no longer be inhabited. This definition of at-risk communities needs to be tightened to focus logging exemptions only where needed.
- 3) Linear Construction Zones: I disagree with the draft Colorado Rule's allowance of road building (euphemistically called "linear construction zones") for new developments. New roads of any type should not be allowed to access or develop future water facilities, nor should the "linear construction zones" be expanded to permit new transmission, utility, and telecommunication lines. Any construction corridors on roadless forests must be limited to existing rights-of-way.
- 4) Upper Tier Roadless Area Protection: Upper tier protections for roadless lands must be expanded and strengthened. The draft Colorado Rule provides enhanced "upper tier" protection for only 13% of Colorado roadless areas, despite the fact that well over half are known to provide exceptional wildlife habitat, important sources of clean drinking water for millions of downstream Americans, or unique and outstanding recreational opportunities. Further, loopholes put even the few "upper tier" roadless areas at risk from oil and gas development, pipelines, and transmission lines. A final Colorado Rule should ensure that all "upper tier" lands and other roadless lands have strict No Surface Occupancy stipulations to protect the

COR-180

entire roadless area from any future oil and gas leasing and development. These areas must not permit the use of "linear construction zones" to facilitate pipelines, transmission lines, or telecommunication facilities.

Thank you for this opportunity to provide comment. I support the protections embodied in the National 2001 Roadless Rule and do not support managing Colorado's National Forests to a lower standard. To ensure that any state-specific rule is at least as protective as this landmark conservation tool, a final rule needs to expand and strengthen the "upper tier" protections, must tighten the overly broad discretion that would allow logging far into the backcountry and building of "linear construction zones," and ensure that Colorado's oil and gas "gap leases" are not developed.

Colorado's remaining wildlands provide clean water, abundant wildlife, and unsurpassed recreation on a nationally recognized public landscape. They are simply too great a resource to squander. The Forest Service's management of roadless areas must match the Obama administration's commitment to strong environmental protections of roadless areas.

Sincerely,

Mrs. Kathleen Simmons  
90 Strong St  
Easthampton, MA 01027-2538

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**COR181.**

**JUN 27 2011**

(505) 275-5156  
FAX (916) 456-6724

June 25, 2011

RE: Federal Register/ Vol. 76 No. 73 Friday April 15, 2011/ Proposed Rules

Dear Gentlemen,

The Colorado Roadless Rule is fatally flawed and in error and impacts implementing the Rule will cause irreparable harm to the State of Colorado and will negatively impact citizens in every community. In 2005, the State of Colorado opposed the Forest Service Roadless Rule (Rule). The Rule is 'top down agendas, conventions, programs and plans' being forced upon the people of Colorado by the United Nations through the International Union for Conservation of Nature (IUCN), United Nations Environment Programme (UNEP), the United Nations Development Programme (UNDP), by the World Conservation Congress and World Parks Commission through the use of international agencies. The Rule is implementing Sustainable Development at a regional scale to further Agenda 21 at a local level as mandated from the Rio Summit 2000 and found in the Seville Strategy. The Rule forces the closure of roads in remote communities where populations are spread out over areas and these populations rely upon these roads that connect to other roads used for access to resources, infrastructure, wildfire fighting and liberty to travel, hunt and rights assured as constitutional freedoms enjoyed by citizens. The Rule compromises freedoms enjoyed by citizens and who will suffer irreparable harm from such forced restrictions.

The Forest Service (FS) and United States Department of Agriculture (USDA) are participating members to the IUCN and are international members that are expanding 'protected areas' under the Rule. The economic loss to the state of Colorado for eliminating all forms of resource development includes; oil, gas, all mining, timber harvesting, personnel use lumber cutting, grazing, recreation, hunting, fishing are insurmountable. These international agencies use their global figures for their findings of no significant impacts.

On page 21272, of the Federal Register Colorado Roadless Proposed Rules it states that the action will manage inventoried roadless areas on the national Forest System. This is misleading because these lands include wilderness, national parks, national monuments,

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On page 21275, Section 294.41 of the Rule; (page 64, 161, 163, 164 in EIS); 'water conveyances are mentioned and the agencies will only recognize water rights decreed from a judge in water court but in what capacity can they do this and how will the Forest Service Supervisor, in his international capacity, have jurisdiction over such water rights? The state of Colorado has jurisdiction over water and these international agencies are now acquisitioning water rights? The Clean Water Act is mentioned and so is the USDA Global Climate Change Program that proves that the USDA is acting as an international member and is implementing international programs, conventions and agendas as mentioned on page 163 of the EIS. On pages 167 and 171 of the EIS, it describes the international agencies plans of decreasing water used for agricultural, domestic and industrial uses which is usurping Colorado Constitutional water rights.

On page 21276 and 21276, Section 294.41 and 294.42, (page 65, 106, 118 in EIS) there is mentions of a 1 ½ mile boundary enacted for every community for a wildfire buffer zone, as if a wildfire is planning to stop right at the 1 ½ mile marked boundary. This is creating buffer zones for protected areas rather than wildfire management and is placing human lives in danger, destruction of property, destroying animals and animal habitats from negligence and such mismanagement practices.

On page 21276, Section 294.42, (pages 25-29, 41, 59, 63, 105, 112, 124 of EIS) the agencies will prohibit tree removal which is placing restrictions on commerce, trade, building construction, heating and any and all uses of wood products and any other resources from the forests. In HFRA (pages 42, 65, 112, 118, 125 EIS) which is from the Federal Register 66 FR 753, January 4, 2001, there is a list of at risk communities in Colorado that are at risk for wildfires. Most of central and western Colorado cities and communities are among those listed. These agencies are using this list to implement their global agendas upon state lands and all citizens of Colorado.

On page 21277, Section 294.43, (pages 26-29, 40, 49, 60-62, 65 69, 112, 137-141, 146, 150, 151, 157 of EIS) there are plans for a prohibition on road construction which will restrict commerce, trade, economic benefits for the state and citizens which is again clear violations to rights of the state, citizens, businesses and Native American Indian Nations. The agencies are using foreign mandates as sustainable development, Convention on Biological Diversity (CBD), Convention on Trade of Endangered Species (CITES) to control the state and the people and all property. CITES is alluded to on pages 174-188 of

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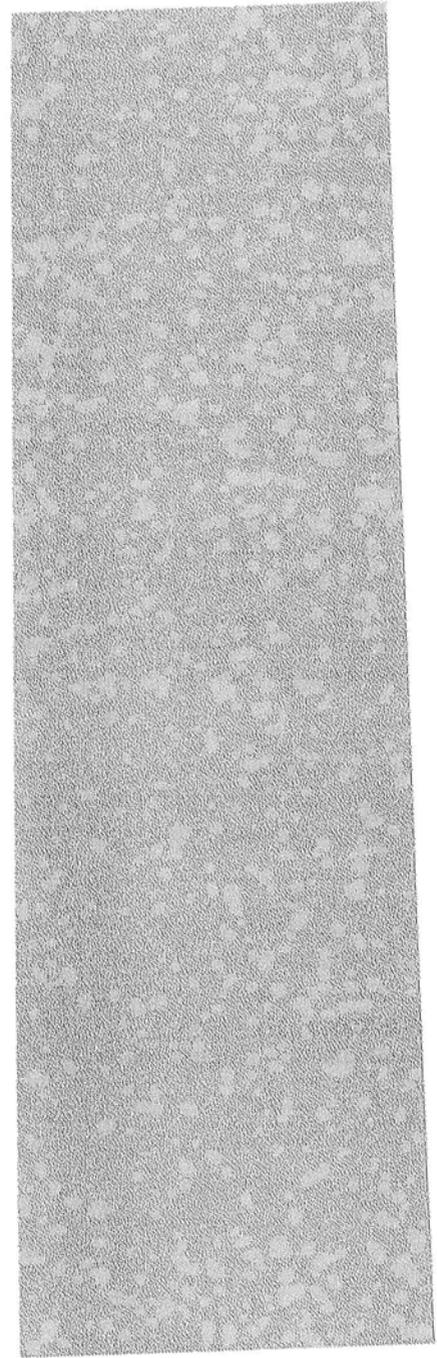
... water canals, telecommunications, electrical power lines, livestock grazing, pipelines to gas and oil, essentially all the infrastructure in the state would be at the disposal and pleasure of the international Regional Forester ( pages 63-64, 273 EIS) who would make all determinations of what will be decommissioned and what is necessary. This would have the potential for far reaching insurmountable negative impacts to other states and people that rely upon electrical power supplies, water delivery, gas and oil pipelines, as well as city and county water supplies and individual rights and this could negatively impact commerce.

On pages 287 and 292 of the EIS, the USDA claims the rights of citizens with disabilities will not be affected by the Rule. However, the Rule places access restrictions upon lands by creating semi primitive and primitive protected areas as all human uses are prohibited such as hunting, fishing, bird watching, lumber harvesting, horseback riding, road access, and this would include wheelchair access that would be prohibited by the prohibition of all motorized vehicles. Again, this is clear usurpations of rights to citizens with disabilities and violates the American Disabilities Act.

On page 21278, Section 294.45, (pages 19, 40, 48, 52 of EIS), NEPA is claimed as being complied with, yet, NEPA is covertly enforcing biological diversity, sustainable development, the promotion of endangered and threatened species (pages 112, 174 of the EIS) and promoting the CBD (page 108, 109 of EIS) CITES, and the Migratory Bird Treaty (pages 222-226 of the EIS) as well as more international conventions, programs and agendas.

On page 21278, Section 294.46, the agency 'requires' the state of Colorado to operate on a cooperating agency status. The FS is operating as an international agency and Colorado is a state with rights, how can the international agency force the state to become a cooperating agency?

On page 21278, Section 294.47, (page 62 of EIS) states the Regional Forester, would modify Colorado Roadless Area (CRA) boundaries by inclusion or exclusion of modification of lands and has removed the requirement of U.S. Congress being expected to amend by approval or disapproval of the modifications. This is implementing foreign mandates issued by World Parks Congress and World Conservation Congress and not the United States Congress.

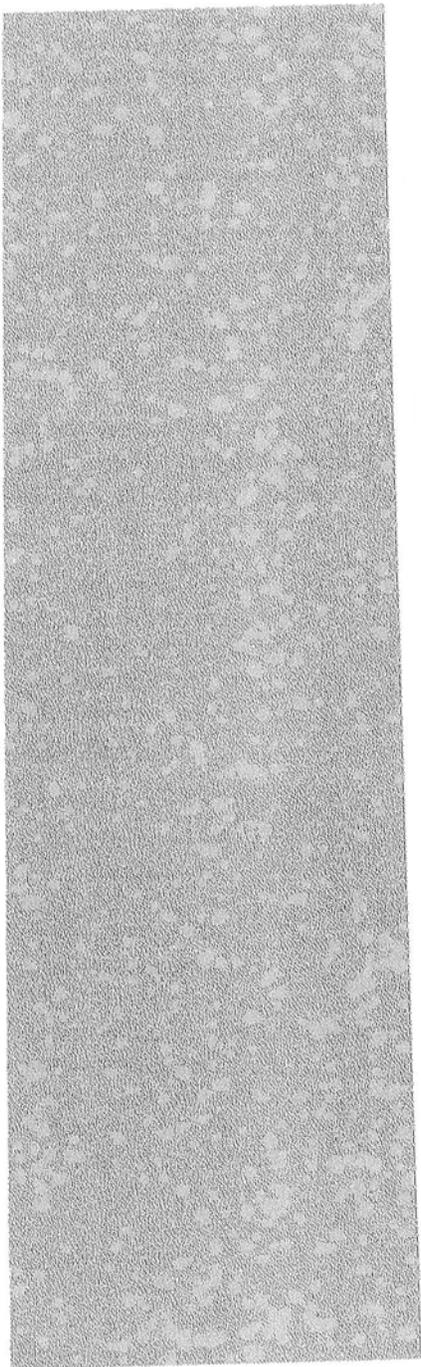


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approximately \$50 million that triggered an OMB review as specified in Executive Order 12866. Such a prohibition of minerals would have devastating affects of insurmountable epic economic proportions. (Pages 130-319 of the EIS) The economic losses projected in the EIS are fatally flawed and in error due to the agencies using global percentages instead of accurate cumulative impact numbers and how it relates by community, state and nation which is more insurmountable negative impacts from job losses, from all of the prohibitions placed upon all forms of mineral extraction, road construction, livestock grazing, all forms of recreation, infrastructure access, water (pages 128, 129 of the EIS). Such plans call for the complete dismantling of Colorado's infrastructure which would have negative impacts to this nation's infrastructure. Five counties are listed in Colorado as being impacted by this when in fact the impacts are far more reaching and far more devastating, not just the five. The small businesses involved range from heavy equipment operators to heavy equipment haulers, pipe haulers, oil and gas suppliers, small communities, restaurants, real estate, schools, ranchers, the state of Colorado revenues, tool supplies, tourism, skiers, hotels, motels, maintenance on equipment and the list is very extensive and none of this was considered as substantial economic loss.

On pages 128, 129 of the EIS, quarried rock is mentioned and such mineral extraction on public lands would not be permitted under the Rule. The adverse insurmountable impacts from this are not mentioned in the Federal Register Notice. The agency expects private lands to be the only mineral extraction area for quarried rock and such prohibitions placed upon mineral extractions on public lands has insurmountable and devastating impacts to federal highways, state roads, county and city roads.

On pages 39, 40, 49, 50, 66, 89, 91, 99, 107, 120, 124, 168, 230-268, 288, 291-296 of EIS, the plan is to create primitive and semi-primitive zones, creating pre-European settlement areas throughout Colorado which is in truth creating protective areas while managing them as protected areas that carry the category 1 through VI protection status. (See the 1997 United Nations Protected Areas Prepared by the World Conservation Monitoring Centre and IUCN World Commission on Protected Areas, written by the World Conservation Monitoring Centre and the IUCN the World Conservation Union and on page 18, Definitions Category Ia: Strict Nature Reserve: protected area managed for science; Category 1b: Wilderness Area: protected area managed mainly for wilderness protection; Category II: National Park: protected area managed mainly for ecosystem protection and recreation; Category III: National Monument: protected areas managed mainly for conservation of specific natural features; Category IV:



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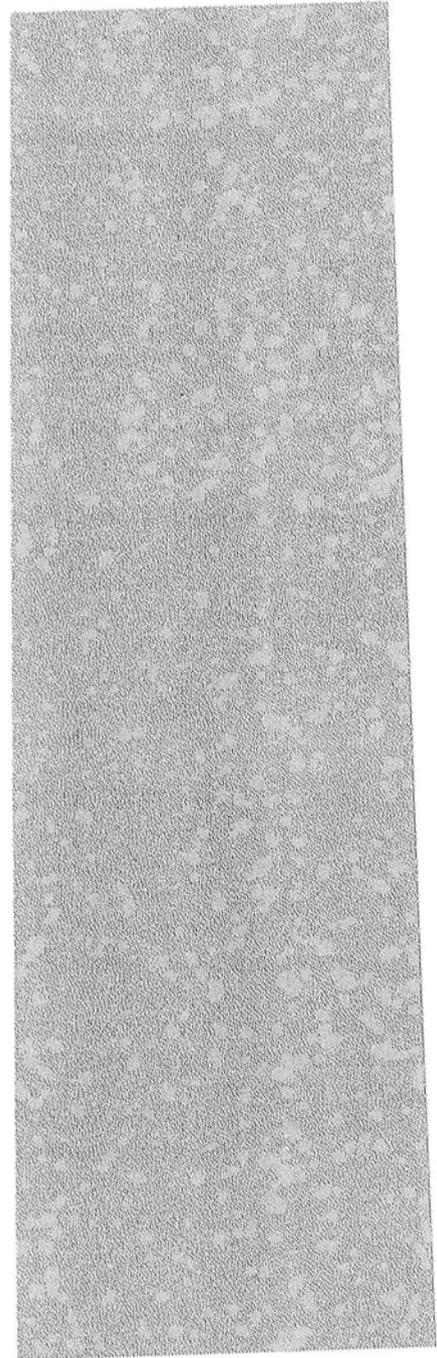
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... are implementing international agendas, programs and conventions that are designed at the international level and forced upon the American Indian Nations as foreign mandates under the guise of federalism.

On page 19 of the EIS, the agencies claims to have 'outreached' to the Ute Mountain Ute and Southern Ute Tribes, yet, they have not been formally notified of the agency affiliations and true intentions have not been disclosed. Formal 'government to government meetings' as stipulated in Executive Order 13175, must take place with the 'Official Tribal governments' prior to any actions commencing. In what capacity are these international agencies having 'government to government' meetings? The Rule can negatively impact all Native American Tribes by restricting and preventing them from access to their sacred sites (pages 40, 261 of EIS), accesses for their cultural, traditional medicines and other needed resources. The Ute Nation may have violations to their Brunot Treaty (page 41, 48, 53, 54, 60 of EIS) by these international agencies that enforcing their foreign mandates.

On page 21287, Section 294.49, Energy Effects are discussed and the Rule will negatively impact oil, gas, coal production while creating primitive and semi-primitive protected areas as detailed. Tribal hunting rights and accesses is mentioned yet, full disclosure to the Ute Mountain Ute, Southern Ute Tribes and listed 18- Tribes, has not occurred in how access is permitted when no motorized vehicles are allowed in the upper tier zones and plans being implemented are created to limit access in the lower tier zones as well. The Rule claims that it does not mandate Tribal participation when in fact it is forcing Tribes into participating in these foreign mandates.

On pages 21288-21292, Part 294.40-294.47- SPECIAL AREAS (page 20, 40, 41, 49, 50, 66, 89, 91, 107, 168, 172 of EIS) is listed as the need to protect roadless values; which is implementing protected areas schemes as outlined in the 1997 United Nations Protected Areas Prepared by the World Conservation Monitoring Centre and IUCN World Commission on Protected Areas, written by the World Conservation Monitoring Centre and the IUCN the World Conservation Union and on page 18, Definitions Category Ia: Strict Nature Reserve: protected area managed for science; Category 1b: Wilderness Area: protected area managed mainly for wilderness protection; Category II: National Park: protected area managed mainly for ecosystem protection and recreation; Category III: National Monument: protected areas managed mainly for conservation of specific natural features; Category IV: Habitat/Species Management Area: protected area managed mainly for conservation through management intervention; Category V:



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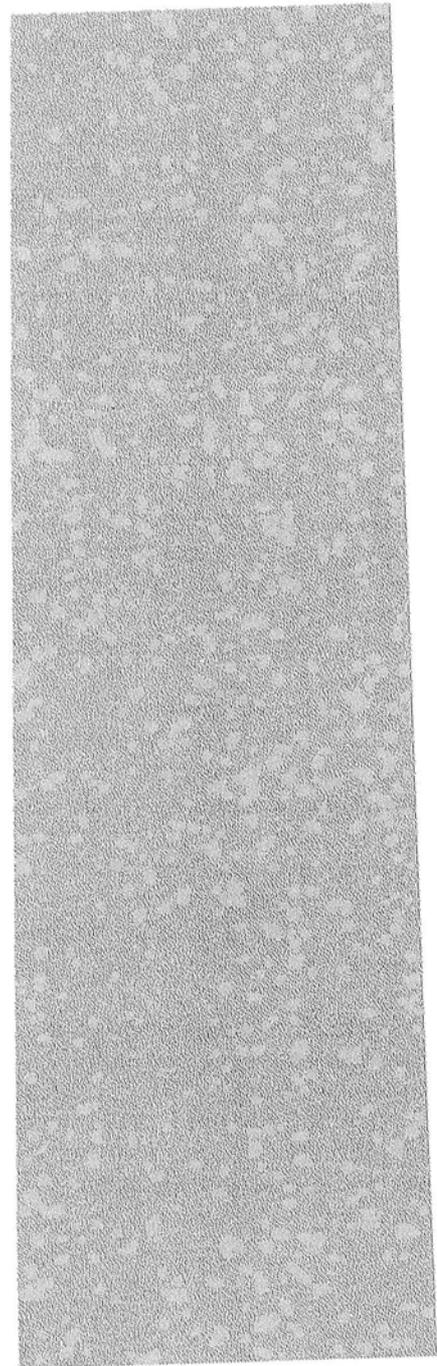
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...the time of a protection zone where no timber harvesting is permitted unless the Regional (international) Forester approves the need for timber harvesting (page 63, 68 EIS). The one size fits all land management of fire being the preferred and the only management tool used (pages 101, 103, 112-115, 117, 120 of the EIS), negatively impacts the communities and places the state and citizens at heightened risk of increased wildfire danger. The "Convention of" Climate Change (pages 101, 119, 174, 186 of EIS) is alluded to and fire is mentioned as the preferred land management tool that does have insurmountable negative impacts that include forced displacements of large populations of humans, wildlife, wildlife habitat destruction and destroys water supplies, the potential to increase mercury into the water systems, human lives lost, private property losses, poor air quality, state property losses, business losses, the ground becoming sterile from such high intensity heat from the wildfire baking the soil where nothing will grow, communities exhausting resources and overwhelming economic losses.

On page 29290, Section 294.43, (pages 25, 27, 43, 45, 49, 61, 141, 142, 146 of the EIS) the Rule states there is a prohibition of road construction and reconstruction and the Regional (international) Forester would determine the need for temporary roads, tree removal, tree cutting, coal, gas & oil access in the North Fork, Uncompahgre, Gunnison National Forests. How does this fit into allowing Tribal access to hunting? How does this work into the big picture for access to these public lands enjoyed by other citizens?

Maps 1 through 3 depict the closing and decommissioning of many roads in Colorado used as accesses to oil and gas resources, grazing allotments, all forms of recreational activities, access for fighting wildfires, roads that connect to major highways and communities, roads used by the Native American Tribe's to access all cultural and traditional needs as well as sacred sites, roads used for hunting, roads used by the public for hunting as well as access for lumber harvesting, roads used to access cabins and camping in the forests. The closing of these accesses is restricting travel, in turn will restrict commerce, trade, and hunting and again restrict rights of liberty to travel freely as described in Vattel's Law of Nations and reflected in the State of Colorado Constitution.

On page 172 of the EIS it mentions that; "the Secretary shall manage and protect Paleontological resources on Federal land using scientific principles and expertise" which follows the strict adherence to foreign mandates describes on page 34, of the Department of Interior Strategic Plan 2011, where there is a map that Department of Interior Secretary Ken Salazar provided depicting the IUCN categorized protected areas that are from the Protected Area Database of the United States and almost the entire area of the Western

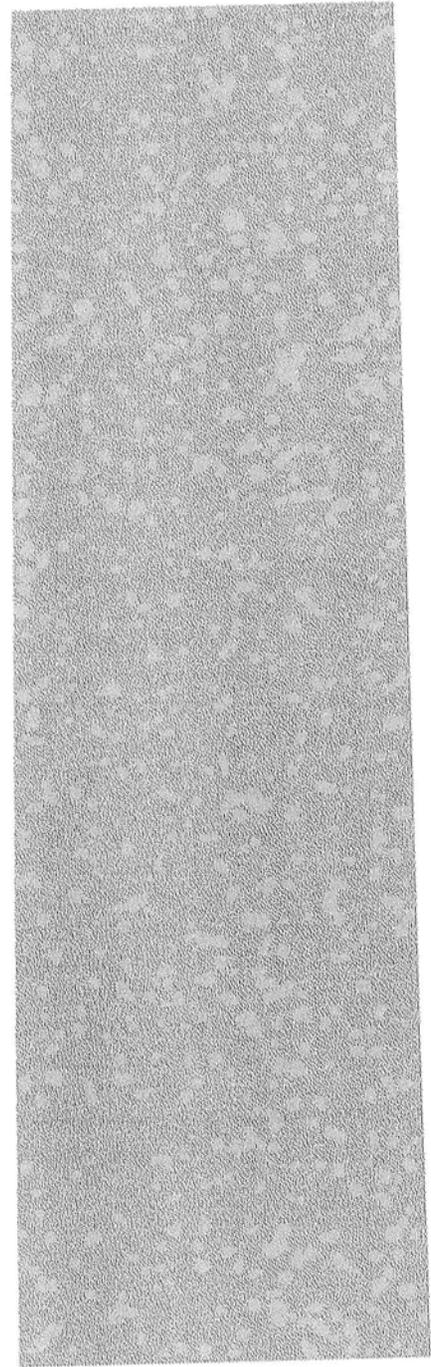


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...ing ... of implementation, the Convention on Biological Diversity, the Convention to Combat Desertification, the Ramsar Convention on Biological Diversity, the Convention to Combat desertification, the Ramsar Convention on Wetlands, the World Heritage Convention and other global agreements.” In the Durban Action Plan revised Version March 2004, the IUCN World Parks Congress met and developed the Durban Action Plan to further its plans to implement and expand the use of protected areas to further biodiversity and sustainable development.

The agencies enlist help from international organizations that help them force their international mandates as shown on pages 338-341 of the EIS; where the Audubon Society, Center for Biological Diversity, Center for Plant Conservation, Earth Justice Defense Fund, Ecological Society of America, Environmental Coalition, Friends of the Earth, Greenpeace, Great Old Broads for Wilderness, National Wildlife Federation, National Wildlife Refuge System, Sierra Club, The Conservation Fund, The Nature Conservancy, Trout Unlimited, Wild Earth Guardians, Wilderness Society and Wilderness Land Trust are among many, who are known as extreme fanatical international environmental organizations.

It should be perfectly clear that the USDA and FS are acting as international agencies to the United Nations; UNEP and IUCN, and are covertly promoting their international conventions, agreements and agendas by forcing the implementation of foreign mandates. These international agencies are usurping the rights of the State of Colorado, the sovereign people, the rights of sovereign American Indian Nations, the rights of the United States and rights of the sovereign people by attempting to forcing foreign mandates listed this Rule that are truly ‘top down’, beginning at the international. These mandates originated at the international level and have eliminated all restraints which intend to circumvent the Colorado Constitution and U.S. Constitutions. The Rule is promoting sustainable development while expanding protected areas programs on all lands in the Western Slope of Colorado for semi-primitive and primitive land management. The Rule promotes discriminatory practices among different ‘classes’ of citizens such as elderly and disabled citizens who would not be able to enjoy the liberty and freedoms of access to areas because they don’t have the ability to walk fifty miles one way or more to an area where they hunt or gather other forest products that their way of life depends upon. The Rule creates dangerous hazardous conditions to all communities in Colorado while it uses fire as the preferred land management tool and removes all forms of resource development including accesses to the state’s infrastructure. The Rule does not account for true economic impacts and did not consider



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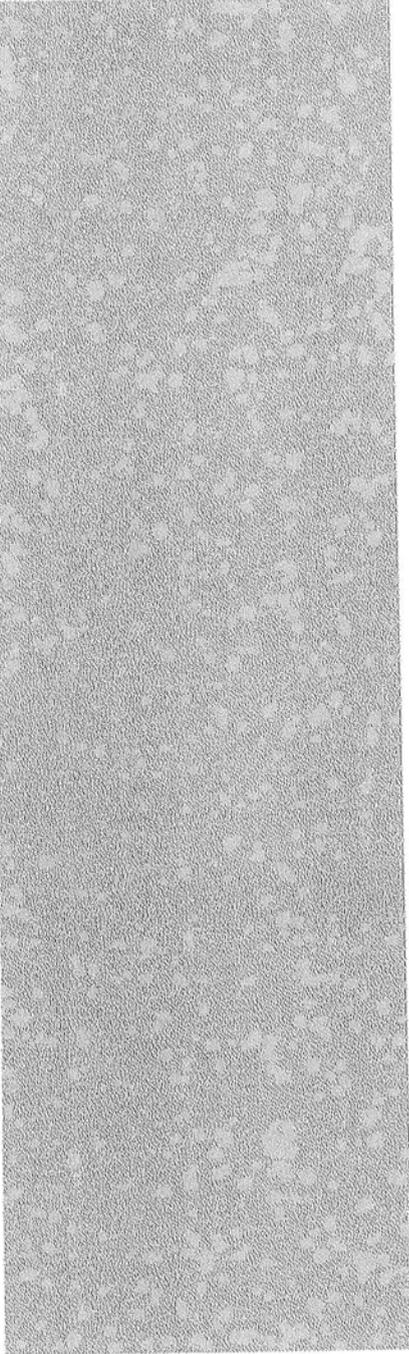
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... enforcement upon our community and the state of Colorado appears to be clear violations of United States Constitution Tenth Amendment. The Rule with its foreign mandates and international agencies as described in all of the aforementioned, need to be vacated at once.

Sincerely,



Miscelle Allison



Public Comment Submission  
on Rulemaking for Colorado Roadless Areas  
Revised Draft Environmental Impact Statement (RDEIS) and/or Proposed Colorado Roadless Rule

This document constitutes my submittal of written comments on the revised draft EIS and/or proposed Colorado Roadless Rule. I understand the USDA Forest Service will review and consider these comments prior to finalizing the EIS and making a decision on the proposed roadless rule. I further understand that these comments, including my name and address, will become part of the public record.

Name: Ken Bohren  
Address: 1827 Forest Ave.  
E-mail: kjbohren@earthlink.net  
Phone: 970-946-2960

JUN 27 2011

Signature:  Date: 6-8-11

COMMENTS:

The public servants should work to keep public land open to me the public. We need to work to put in more roads so I can enjoy more nature without endangering bikers.

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JUN 27 2011

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Name: Bob Durand  
Address: 511 W. 13th St Glenwood Springs CO 81601  
E-mail: \_\_\_\_\_  
Phone: 970 945 5149  
Signature: Bob Durand Date: 6-16-11

COMMENTS:

I would like the Forest Service  
to provide for more Roadless  
Areas in Colorado. More wild areas  
are always a great idea.

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Name: Trisha Scott  
Address: 116 Aspen Village Aspen Co 81611  
E-mail: trishascott@comcast.net  
Phone: 970-948-3770

JUN 27 2011

Signature: [Handwritten Signature] Date: June 16, 2011

COMMENTS:

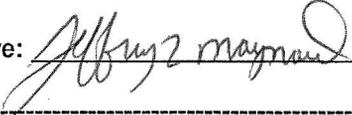
I believe that what is now roadless, in Colorado, should remain roadless. I believe this is especially important for wildlife and wildlife habitat. Please keep all roadless areas roadless, forever. Thank you.

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Name: JEFF MAYNARD  
 Address: 736 BUCKEYE COURT  
 E-mail: RKY mtn 736 @ yahoo.com  
 Phone: \_\_\_\_\_

JUN 27 2011

Signature:  Date: 6/16/11

COMMENTS:

I WOULD LIKE TO CONTINUE TO HAVE ACCESS TO MY WILDERNESS AREAS. THE FAIREST SOLUTION IS TO ALLOW ALL TO USE THEIR WILDERNESS AREAS RESPONSIBLY - NOT TO CLOSE THEM OFF TO AN "ELITE" FEW WHO MAKE THEIR TREKS INTO IT VIA FOOT. WHAT ABOUT THE DISABLED, ELDERLY, ETC. WHO AT THIS MEETING DOESN'T LIVE ON PROPERTY THAT ONCE WAS WILDERNESS AREA? DO THEY HAVE ROADS IN THEIR TOWNS & ~~THE~~ PROPERTY? WHY DO SKI AREAS GET TO DECIDE HOW TO MANAGE OUR PROPERTY? WHY IS IT OK FOR GAS & OIL COMPANIES & FORESTRY INDUSTRIES TO MAKE MONEY OFF OF US THE PEOPLE.

THAT'S WHAT IS NOT FAIR!

June 16, 2011

COR186.

U.S. Forest Service  
White River National Forest

JUN 27 2011

RE: Roadless Area Protection

I am concerned that the Colorado Roadless Rule does not give enough of White River National Forest the protection it deserves. Only 13% of Roadless Areas in WRNF receive full protection. There is much important mid-elevation habitat that has not been fragmented by roads and the development that comes in with them. The wildlife, the water, the air, the plants and all the species from the microorganisms in the soil up to the big game and birds in the sky need undisturbed lands to call home. The health of the habitat in our forests is the baseline for the health of our communities in the neighboring valleys. The one thing we humans are not capable of making is any more new lands for healthy watersheds, thriving wildlife populations, and productive habitat in its natural state. We need to protect all the proposed Roadless Areas for the greater good of native animal and bird populations.

As a Carbondale rancher, I know how important the water sources are that come out of the watersheds of the Thompson Divide Area, particularly in upper Thompson Creek. Our irrigation is completely dependant on snowpack and ground runoff. Building roads in these remote areas would add dust to the snowpack causing earlier melting and less quality water for our homes and our fields. More roads and the access of motorized recreation and industrial development are not in the long-term interest for this backcountry, especially in areas with grazing permits. There is currently plenty of access that is being used.

People are confused by the term "Roadless". Many assume that means closed to all use. Unfortunately this has created a negative impression for Roadless Areas. If people knew that they can still access the trails and old roads that are currently in use, there would be less worry about losing access.

The WRNF Roadless Areas have been carefully mapped to include areas important habitat, healthy forests and game populations. I hope that those areas will be available for my grandchildren to see in their undisturbed beauty.

Please give the Roadless Areas in the WRNF top-tier protection.

Thank you,



Judy Fox-Perry and Will Perry  
P.O. Box 122  
4283 Thompson CR. RD.  
Carbondale, CO 81623

Public Comment Submission  
on Rulemaking for Colorado Roadless Areas  
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JUN 27 2011

Name: Cathleen Krabe  
Address: 0208 Grange Lane, Carbondale, CO. 81623  
E-mail: Krabe@sopris.net  
Phone: 963-9852

Signature: \_\_\_\_\_ Date: 6/16/11

COMMENTS:

I am against any gas drilling in Thompson Creek. I am against motorized vehicles in our forest and building any more roads regardless of the seasons

Public Comment Submission  
on Rulemaking for Colorado Roadless Areas  
Revised Draft Environmental Impact Statement (RDEIS) and/or Proposed Colorado Roadless Rule

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Name: Kate Cocchiarella  
Address: 5198 Gore Circle Vail 81657  
E-mail: cocchiarella@comcast.net  
Phone: 970 476 2234

JUN 27 2011

Signature: [Handwritten Signature] Date: 6-16-11

COMMENTS:

Please protect Roadless Areas. Keep  
wild Areas wild for future  
generations. My children deserve  
to be able to pass the treasure  
of Roadless lands and their  
animals/flora to their children.

Keep Wild Lands Wild!

Thank you

Public Comment Submission  
 on Rulemaking for Colorado Roadless Areas  
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Name: Kathy Welt

Address: \_\_\_\_\_

E-mail: kwelt@archconl.com

Phone: (970) 929 2238

Signature: Kathy Welt

Date: 6-15-11

JUN 27 2011

COMMENTS:

- R. Cables cited the millions of acres of Lodgepole + spruce kill as if the Roadless designation would help that somehow. I believe that the ability to manage the forests - not just the 1/2 mile buffers around WUI's - needs to happen on all Nat'l Forest System lands to address insect damage + forest health, including inventoried roadless areas.
- The North Fork Valley is rich in coal resources and the modern mining operations have successfully reclaimed mined lands to better than pre-mining conditions. Given that fact, it is not clear why any coal is being taken away from the American people. It is also not clear what the criteria were for the North Fork Coal Mining area boundary - why were some Roadless areas with identified recoverable coal reserves not included in the coal mining exemption area. Those fed'l coal reserves are being removed from development and benefit of the American people. All recoverable coal reserves should be made available for development.
- I am familiar with the Bull Mtn. pipeline project and

(over)

Know that much of that pipeline was constructed along an existing, smaller older pipeline corridor. As such new disturbance was minimized. By saying that a pipeline - a linear feature - cannot be constructed through a roadless area, the Forest may be forcing greater, more extensive disturbance. To restrict linear construction that could be the least disturbance and will be reclaimed and restored (refer to photos in ppt. presentation tonight) to a typically better than previous condition. These reclaimed linear features are not roads.

- Because Alternatives 1, 2, & 4 dictate restrictions across the board in CO Forests & are not able to manage each forest in accordance with the resources of that Forest, I believe that a morphed Alternative 2 & 3 that allows each Forest in GMLG to establish & manage Roadless areas as applicable to each Forest
- Forest Management is desperately needed and restrictive designations like Roadless areas is not a logical plan to restore healthy forests!



REGIONAL OFFICE  
USDA, Forest Service  
740 SIMMS STREET  
GOLDEN, COLORADO 80401-4720

OFFICIAL BUSINESS  
PENALTY FOR PRIVATE USE, \$300

c/o Trey Schille  
- Planning Dept

CORR18286

JUN 27 2011



ICF International  
c/o Susan Davis  
630 K street  
Suite 400  
Sacramento, CA  
95814

FIRST CLASS MAIL

**From:** Brandon Ragsdale [bragsdale@fedex.com]  
**Sent:** Friday, June 24, 2011 1:21 PM  
**To:** COcomments  
**Cc:** Brandon Ragsdale  
**Subject:** Roadless Rule

Form 5-  
CO OHV Coalition

6/24/11

Dear Sirs:

I am contacting you to voice my support for the 57,600 acre reduction in designated Roadless areas provided by Alternative 2 of the proposed Colorado Roadless Rule. I am vigorously opposed to Alternative 4 of the proposal. I also support the continued management of dispersed motorized recreation in Roadless Areas under the Travel Management Planning process. Motorized recreationalists utilize these areas for the dispersed recreational experience they are designed to provide, a fact often lost in the application of the roadless rule.

While I support Alternative 2, I do not support the theory of upper tier area included in this proposal, as often the Roadless Rule is a source of confusion and frustration for the users of the forests. An additional level of roadless area designation will not help this situation. The upper tier area theory will make the frustration and confusion experienced by forest users worse. In addition to increasing frustration, the upper tier theory simply makes no sense in terms of providing flexibility to managers to address local fire prevention concerns. Alternative 4 simply makes no sense from this perspective as it provides an upper tier area.

I believe the increased flexibility provided by the Colorado Roadless Rule proposal is superior to the existing Roadless Rule. Given the exceptionally high fuel loads present as a result of the pine beetle epidemic, it is critical that forest managers have the full range of possible options to address the most cost effective way to reduce the risk of forest fires to mountain communities and homes. The EIS goes to great lengths to address the need for flexibility in dealing with fuels issues on the forests. The theory of upper tier area directly conflicts with this analysis as significant numbers of local communities will be directly limited in their ability to address fire prevention as a result of upper tier designations within a short distance of the community.

I am also opposed to the negative economic impact that will result from the upper tier theory in the new Roadless Rule which will result in a negative impact to the Colorado economy in excess of \$100 million dollars. Given the poor state of the Colorado economy for the foreseeable future and the mandate of the Multiple Use Sustained Yield Act requirement of balancing economic interests with all other interests, I don't think this required balance has been achieved after the inclusion of the upper tier areas.

I also have concerns regarding the proposed 107,300 acre increase in roadless areas on the Pike/San Isabel Forest and the 22,300 acres increase on the San Juan Forest. These expansions of roadless areas are directly in conflict with the stated need for flexibility in fire management that is discussed at length in the EIS. Clearly an areas designation as roadless will reduce the tools available to managers to deal with fire mitigation issues.

Sincerely,

Brandon Ragsdale  
667 Coyote Willow Drive  
Colorado Springs, CO. 80921

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**From:** Nicole Rosa [nicki@totalmath.net]  
**Sent:** Saturday, June 25, 2011 5:08 PM  
**To:** COcomments  
**Subject:** Colorado's Roadless Areas

Dear Forest Service,

I am writing about the proposed rules for Colorado's Roadless Areas. I believe that they provide too many exemptions to adequately ensure the future of our beautiful natural lands. We citizens don't want this !!! Your proposal protects less than 13% of Colorado's "upper tier" roadless areas. Even upper tier designations will not protect important areas from future oil or gas activity.

I fully agree with the Colorado Mountain Club's statement:

“While we maintain that a Colorado-specific rule is not needed because there is already a carefully crafted, strongly supported national rule in place, any rule that is finalized should provide at least the level of protection found in the (current) national roadless rule. Colorado’s roadless forests are a state treasure and a national asset-they merit greater protection than what is currently provided in the Obama proposal and they deserve the same level of protection as those in other states.”

I request that Colorado's roadless areas receive the same protection as in other states.

I request that more areas be designated Upper Tier, especially Pikes Peak and Rampart East.

It's your job to protect our natural areas. DO IT PLEASE !!!!!!!!!!!!!!!

Sincerely,

Nicole Rosa  
615 N. Prospect St.  
Colorado Springs, CO 80903  
719-227-1358

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**From:** okeefe@riversandcreeks.com  
**Sent:** Thursday, June 23, 2011 4:21 PM  
**To:** COcomments  
**Subject:** Colorado Roadless Rule

Thomas O'Keefe  
3537 NE 87th St  
Seattle, WA 98115-3639

June 23, 2011

Tom Vilsack  
Colorado Roadless Rule/EIS  
P.O. Box 1919  
Sacramento, CA 95812

Dear Tom Vilsack:

President Obama's Administration pledged that a Colorado Roadless Rule will be at least as protective of roadless areas -- and preferably more protective -- than the 2001 Roadless Rule. Upholding this commitment is personally important to me.

Creating an upper tier management category is a welcome development, but additional acres should be added. Personally I would like to see East Animas CRA, West Needles CRA, and Weminuche Adjacent added to the upper tier. These areas border the Animas River along the segment between Silverton and Rockwood, one of the nation's most outstanding whitewater runs. They also border portions of Lime Creek including Adrenaline Falls, one of the most iconic whitewater features in the country.

Thank you for this opportunity to provide comment. I support the protections embodied in the National Roadless Rule and do not support managing Colorado's National Forests to a lower standard. To make sure that any state-specific rule is at least as protective as this landmark conservation tool, a final rule needs to expand and strengthen the 'upper tier' protections and give priority to maintaining and enhancing roadless characteristics in all the states Inventoried Roadless Areas.

Sincerely,

Thomas O'Keefe

**From:** crank1979@bigpond.com  
**Sent:** Friday, June 24, 2011 2:11 PM  
**To:** COcomments  
**Subject:** Colorado Roadless Rule

Grant Byrne  
183 Hawthorne Rd, Bargo, NSW, Australia 2574 Bargo, NSW, Australia, CA 90210

June 24, 2011

Tom Vilsack  
Colorado Roadless Rule/EIS  
P.O. Box 1919  
Sacramento, CA 95812

Dear Tom Vilsack:

Thank you for this opportunity to provide comment. I support the protections embodied in the National Roadless Rule and do not support managing Colorado's National Forests to a lower standard. To make sure that any state-specific rule is at least as protective as this landmark conservation tool, a final rule needs to expand and strengthen the 'upper tier' protections and give priority to maintaining and enhancing roadless characteristics in all the states Inventoried Roadless Areas.

Sincerely,

Grant Byrne

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**From:** Colorado Environmental Coalition [info@ourcolorado.org] on behalf of Ron Sherman [rjct1@bresnan.net]  
**Sent:** Monday, June 20, 2011 2:17 PM  
**To:** COcomments  
**Subject:** I do not support your stand on roadless areas

Jun 20, 2011

Colorado Roadless Comments

Dear Comment Team Roadless Comments,

Please accept these comments on the proposed rule for Colorado's roadless National Forests. I urge that the Forest Service, if it proceeds with adopting a rule for these public lands, stay with the present plan and do not let gung ho hikers, environmentalist and those that are 18 to 45 make it impossible for us over 60 to get into the wilds we grew up in and still wish to hunt and enjoy.

Why lock seniors out to satisfy a few? The enviro groups have already about ruined this country with the billions they have cost us all in court costs, fees, time and jobs. They have seriously slowed energy development to the point of hi prices for oil and gasoline. It is time to stop this type of hype in it's tracks.

The Colorado plan is for Colorado. We don't need the feds' plan in this state as almost any federal plan adopted in the past has been detrimental to our way of life, jobs and our wallets yet have only accomplished turmoil and cut out the seniors that made the state.

Sincerely,

Ron Sherman  
2624 F 1/2 Rd  
Grand Jct, CO 81506-8314  
(970) 241-9674

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**From:** George Cort [ecort@montrose.net]  
**Sent:** Thursday, June 23, 2011 1:33 PM  
**To:** COcomments  
**Subject:** Colorado Roadless Rule

Following are my comments on the Proposed Rule in Accordance with the APA.

I support Alternative Number 3, because it is the only alternative that conforms to the Forest service's own founding purpose, Multiple Use. The Forest Service of the U.S. Department of Agriculture is dedicated to the principle of multiple use management of the Nation's forest resources for sustained yields of wood, water, forage, wildlife, and recreation. Through forestry research, cooperation with the States and private forest owners, and management of the national forests and national grasslands, it strives—as directed by Congress—to provide increasingly greater service to a growing Nation.

In this regard, Alternative #3 provides the greatest number of jobs, economic benefit, reduces fire hazards the most, provides flexibility to control bark beetles, and provides the greatest flexibility to protect communities and water supply systems.

If the environmental organizations, such as San Juan Citizens Alliance (SJCA), Citizens for the Arapaho-Roosevelt (CFAR), Wild Connections (Upper Arkansas and South Platte Project - UASPP), White River Conservation Project (WRCP), High Country Citizens Alliance (HCCA), Western Slope Environmental Resource Council (WSERC), San Luis Valley Ecosystem Council (SLVEC), the Colorado Environmental Coalition (CEC), and the Southern Rockies Ecosystem Project (SREP) wish to "protect" additional land, there is a Congressional provided legal procedure: WILDERNESS ACT Act of September 3, 1964, (P.L 88-577, 78 Stat. 890; 16 U.S.C. 1 1 21 (note), 1 1 31-1136) These organizations, and similar ones have only a single purpose that is not consistent with the Forest Services purpose, i.e. Multiple Use.

Alternatives #2 designates 562,200 acres as CRA upper tier acres and Alternative #4 designates 2.6 million acres. These areas were identified in forest plans, or during forest plan revision processes, as areas where tree-cutting and road building restrictions would be appropriate. Tree-cutting is allowed in the upper tier only for two limited exceptions.

However, there is no congressionally approved authority for so-called "upper tier CRAs". Despite it's favor by the environmental groups, they have only a letter authorizing it from Agriculture Secretary Vilsack . If this is OK, then what is to prevent some future Secretary from approving clear citing or surface mining, or 4-lane super highways across the forest?

Upper Tier Colorado Roadless Area: Specific portions of or entire Colorado Roadless Areas identified in a set of forest roadless area maps maintained at the national headquarters office of the U.S. Forest Service. Colorado Roadless Final Petition - April 4, 2010 "In the coming months, this petition will be put out for comment to allow for additional public input into protection of roadless areas on Colorado's National Forests. As the Forest Service prepares a draft environmental impact statement for this petition, I have asked that the agency analyze the potential of adding significantly to the number of acres receiving a higher level of protection than the 2001 rule. I'm confident that working with the Governor and with the public, we will craft a final rule that is, on balance, at least as protective of roadless areas -- and preferably more protective -- than the 2001 Roadless Rule." STATEMENT FROM AGRICULTURE SECRETARY VILSACK ON COLORADO ROADLESS PETITION WASHINGTON, April 6, 2010 -

Therefore, I strongly urge the Forest Service to adopt Alternative Number 3 as the only one that is consistent with the National Purpose of the Service and provides the greatest benefit to the nation and its people.

Yours, Very Truly, George E. Cort, 16960 Wildwood Dr., Montrose, CO 81403 970-240-3926

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**From:** The Wilderness Society [action@tw.s.org] on behalf of Yvonne Martin [gpofnc@bellsouth.net]  
**Sent:** Friday, June 10, 2011 3:23 AM  
**To:** COcomments  
**Subject:** I support strong protections for Colorado's Roadless Areas

Jun 10, 2011

Forest Service Comment Team Forest Service Comment Team Colorado Roadless Rule/EIS P.O. Box 1919 Sacramento, CA 95812

Dear Forest Service Comment Team Comment Team,

Please accept these written comments on the proposed rule for Colorado's roadless national forests. I urge the Forest Service to ensure that any rule be at least as protective as the National 2001 Roadless Rule, which the Obama administration has supported and defended in federal court.

To ensure that Colorado's valuable wild lands receive the level of protection they deserve, a final Colorado Rule must be significantly improved in the following ways:

1) Oil and Gas Leases: The proposed Colorado Rule would allow development to go forward on approximately 100 new oil and gas leases in some of Colorado's best backcountry. These "gap leases" were illegally issued by the Bush administration after the Roadless Rule was adopted in 2001. Any Colorado Rule must be accompanied by an agreement that applies "no-surface occupancy" requirements for the approximately 100 oil and gas gap leases, or other guarantees that the affected roadless areas are never damaged. Also, the Colorado rule must provide for "no-surface occupancy" on all new oil and gas leases on all Forest Service roadless lands.

Oil and gas companies have managed to "nipple" a little here..."nipple" a little there, until they have desecrated and destroyed countless acres of precious land and waters (Gulf of Mexico). Is there no end to their greed?! Each of us needs to do our part also....CONSERVE! Make each trip to the store count!  
Car pool! As long as we do nothing, we are part of the problem!

2) Logging: The proposed Colorado Rule contains an overly-broad definition of "at-risk community." The rule's proposed list includes more than 340 so-called "communities," some of which are not even located on current State maps and may no longer be inhabited. This definition of at-risk communities needs to be tightened to focus logging exemptions only where needed.

3) Linear Construction Zones: I disagree with the draft Colorado Rule's allowance of road building (euphemistically called "linear construction zones") for new developments. New roads of any type should not be allowed to access or develop future water facilities, nor should the "linear construction zones" be expanded to permit new transmission, utility, and telecommunication lines. Any construction corridors on roadless forests must be limited to existing rights-of-way.

4) Upper Tier Roadless Area Protection: Upper tier protections for roadless lands must be expanded and strengthened. The draft Colorado Rule provides enhanced "upper tier" protection for only 13% of Colorado roadless areas, despite the fact that well over half are known to provide exceptional wildlife habitat, important sources of clean drinking water for millions of downstream Americans, or unique and outstanding recreational opportunities. Further, loopholes put even the few "upper tier" roadless areas at risk from oil and gas development, pipelines, and transmission lines. A final Colorado Rule should ensure that all "upper tier"

COR196

lands and other roadless lands have strict No Surface Occupancy stipulations to protect the entire roadless area from any future oil and gas leasing and development. These areas must not permit the use of "linear construction zones" to facilitate pipelines, transmission lines, or telecommunication facilities.

Thank you for this opportunity to provide comment. I support the protections embodied in the National 2001 Roadless Rule and do not support managing Colorado's National Forests to a lower standard. To ensure that any state-specific rule is at least as protective as this landmark conservation tool, a final rule needs to expand and strengthen the "upper tier" protections, must tighten the overly broad discretion that would allow logging far into the backcountry and building of "linear construction zones," and ensure that Colorado's oil and gas "gap leases" are not developed.

Colorado's remaining wildlands provide clean water, abundant wildlife, and unsurpassed recreation on a nationally recognized public landscape.

They are simply too great a resource to squander. The Forest Service's management of roadless areas must match the Obama administration's commitment to strong environmental protections of roadless areas.

Sincerely,

Ms. Yvonne Martin  
5 Odd Bits Ln  
Asheville, NC 28806-7711  
(828) 251-1741

COR197.

EFH

June 22, 2011

JUN 27 2011

Colorado Roadless Rule/EIS  
PO Box 1919  
Sacramento, CA 95812

Re: Colorado Roadless Rules

To whom it may concern:

I attended the meeting in Glenwood Springs and this is my response to the proposed Roadless Rules:

In my opinion there should be more areas included in the upper tier of protection.

I know and love Thompson Creek and it should remain pristine for myriad reasons.

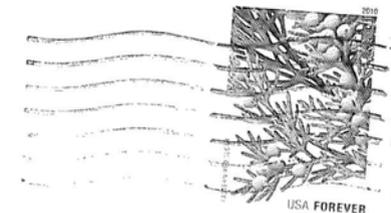
Thank you,

A handwritten signature in cursive script that reads "Ellen Hunt". The signature is written in black ink and is positioned to the right of the typed name "Ellen Hunt".

Ellen Hunt

E. F. HUNT  
P. O. BOX 8770  
ASPEN CO 81612

JUN 27 2011



COR 197

Colorado Roadless Rule/EIS  
PO Box 1919  
Sacramento, CA 95812



# PUBLIC SUBMISSION

<b>As of:</b> June 27, 2011
<b>Received:</b> June 23, 2011
<b>Status:</b> Draft
<b>Tracking No.</b> 80ead338
<b>Comments Due:</b> July 14, 2011
<b>Submission Type:</b> Web

**Docket:** FS\_FRDOC\_0001  
Recently Posted FS Rules and Notices.

**Comment On:** FS\_FRDOC\_0001-1051  
Special Areas; Roadless Area Conservation: Applicability to the National Forests in Colorado

**Document:** FS\_FRDOC\_0001-DRAFT-0175  
Comment on FR Doc # 2011-09119

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## Submitter Information

**Name:** George Edward Cort  
**Address:**  
16960 Wildwood Dr.  
Montrose, CO, 81403  
**Email:** ecort@montrose.net  
**Phone:** 970240-3926

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## General Comment

Following are my comments on the Proposed Rule in Accordance with the APA.

I support Alternative Number 3, because it is the only alternative that conforms to the Forest service's own founding purpose, Multiple Use. The Forest Service of the U.S. Department of Agriculture is dedicated to the principle of multiple use management of the Nation's forest resources for sustained yields of wood, water, forage, wildlife, and recreation. Through forestry research, cooperation with the States and private forest owners, and management of the national forests and national grasslands, it strives—as directed by Congress—to provide increasingly greater service to a growing Nation.

In this regard, Alternative #3 provides the greatest number of jobs, economic benefit, reduces fire hazards the most, provides flexibility to control bark beetles, and provides the greatest flexibility to protect communities and water supply systems.

If the environmental organizations, such as San Juan Citizens Alliance (SJCA), Citizens for the Arapaho-Roosevelt (CFAR), Wild Connections (Upper Arkansas and South Platte Project - UASPP), White River Conservation Project (WRCP), High Country Citizens Alliance (HCCA), Western Slope Environmental Resource Council (WSERC), San Luis Valley Ecosystem Council (SLVEC), the Colorado Environmental Coalition (CEC), and the Southern Rockies Ecosystem

COR 198

Project (SREP) wish to "protect" additional land, there is a Congressional provided legal procedure: WILDERNESS ACT Act of September 3, 1964, (P.L 88-577, 78 Stat. 890; 16 U.S.C. 1121 (note), 1131-1136) These organizations, and similar ones have only a single purpose that is not consistent with the Forest Services purpose, i.e. Multiple Use.

Alternatives #2 designates 562,200 acres as CRA upper tier acres and Alternative #4 designates 2.6 million acres. These areas were identified in forest plans, or during forest plan revision processes, as areas where tree-cutting and road building restrictions would be appr

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**From:** The Wilderness Society [action@tw.s.org] on behalf of Stephen Howard [starbj99@msn.com]  
**Sent:** Thursday, June 09, 2011 4:52 PM  
**To:** COcomments  
**Subject:** I support strong protections for Colorado's Roadless Areas

Jun 9, 2011

Forest Service Comment Team Forest Service Comment Team Colorado Roadless Rule/EIS P.O. Box 1919 Sacramento, CA 95812

Dear Forest Service Comment Team Comment Team,

Please accept these written comments on the proposed rule for Colorado's roadless national forests. I urge the Forest Service to ensure that any rule be at least as protective as the National 2001 Roadless Rule, which the Obama administration has supported and defended in federal court.

To ensure that Colorado's valuable wild lands receive the level of protection they deserve, a final Colorado Rule must be significantly improved in the following ways:

- 1) Oil and Gas Leases: The proposed Colorado Rule would allow development to go forward on approximately 100 new oil and gas leases in some of Colorado's best backcountry. These "gap leases" were illegally issued by the Bush administration after the Roadless Rule was adopted in 2001. Any Colorado Rule must be accompanied by an agreement that applies "no-surface occupancy" requirements for the approximately 100 oil and gas gap leases, or other guarantees that the affected roadless areas are never damaged. Also, the Colorado rule must provide for "no-surface occupancy" on all new oil and gas leases on all Forest Service roadless lands.
- 2) Logging: The proposed Colorado Rule contains an overly-broad definition of "at-risk community." The rule's proposed list includes more than 340 so-called "communities," some of which are not even located on current State maps and may no longer be inhabited. This definition of at-risk communities needs to be tightened to focus logging exemptions only where needed.
- 3) Linear Construction Zones: I disagree with the draft Colorado Rule's allowance of road building (euphemistically called "linear construction zones") for new developments. New roads of any type should not be allowed to access or develop future water facilities, nor should the "linear construction zones" be expanded to permit new transmission, utility, and telecommunication lines. Any construction corridors on roadless forests must be limited to existing rights-of-way.
- 4) Upper Tier Roadless Area Protection: Upper tier protections for roadless lands must be expanded and strengthened. The draft Colorado Rule provides enhanced "upper tier" protection for only 13% of Colorado roadless areas, despite the fact that well over half are known to provide exceptional wildlife habitat, important sources of clean drinking water for millions of downstream Americans, or unique and outstanding recreational opportunities. Further, loopholes put even the few "upper tier" roadless areas at risk from oil and gas development, pipelines, and transmission lines. A final Colorado Rule should ensure that all "upper tier" lands and other roadless lands have strict No Surface Occupancy stipulations to protect the entire roadless area from any future oil and gas leasing and development. These areas must not permit the use of "linear construction zones" to facilitate pipelines, transmission lines, or telecommunication facilities.

COR 199

Thank you for this opportunity to provide comment. I support the protections embodied in the National 2001 Roadless Rule and do not support managing Colorado's National Forests to a lower standard. To ensure that any state-specific rule is at least as protective as this landmark conservation tool, a final rule needs to expand and strengthen the "upper tier" protections, must tighten the overly broad discretion that would allow logging far into the backcountry and building of "linear construction zones," and ensure that Colorado's oil and gas "gap leases" are not developed.

Colorado's remaining wildlands provide clean water, abundant wildlife, and unsurpassed recreation on a nationally recognized public landscape. They are simply too great a resource to squander. The Forest Service's management of roadless areas must match the Obama administration's commitment to strong environmental protections of roadless areas.

What will be left after you let the money grubbers take it all for their profit? I, for one, would be willing to take to the streets as those in Egypt, Yemen, Syria, etc., to stop the sale of our country to the greedy rich. I do not for a minute think it couldn't happen here. There are more poor folks in this country than the rich. You really need to start representing ALL of us.

Sincerely,

Mr. Stephen Howard  
516 Clarion Pl  
North Port, FL 34287-1518  
(941) 429-0868

**From:** The Wilderness Society [action@tw.s.org] on behalf of Carol Gibson-Kish  
[cagibsonk@aol.com]  
**Sent:** Sunday, June 12, 2011 9:04 AM  
**To:** COcomments  
**Subject:** I support strong protections for Colorado's Roadless Areas

Jun 12, 2011

Forest Service Comment Team Forest Service Comment Team Colorado Roadless Rule/EIS P.O. Box  
1919 Sacramento, CA 95812

Dear Forest Service Comment Team Comment Team,

Let me get right to the point. Colorado's Roadless Areas need immediate protection. These forests are roadless and pristine for a reason. Development should be forbidden so that we still have some wild areas to enjoy and so native species of animals and plants cannot be eradicated. These areas also provide a buffer against climate change.

So to insure these areas remain as they are, please consider the following:

- 1) Oil and Gas Leases: The proposed Colorado Rule would allow development to go forward on approximately 100 new oil and gas leases in some of Colorado's best backcountry. These "gap leases" were illegally issued by the Bush administration after the Roadless Rule was adopted in 2001. Any Colorado Rule must be accompanied by an agreement that applies "no-surface occupancy" requirements for the approximately 100 oil and gas gap leases, or other guarantees that the affected roadless areas are never damaged. Also, the Colorado rule must provide for "no-surface occupancy" on all new oil and gas leases on all Forest Service roadless lands.
- 2) Logging: The proposed Colorado Rule contains an overly-broad definition of "at-risk community." The rule's proposed list includes more than 340 so-called "communities," some of which are not even located on current State maps and may no longer be inhabited. This definition of at-risk communities needs to be tightened to focus logging exemptions only where needed.
- 3) Linear Construction Zones: I disagree with the draft Colorado Rule's allowance of road building (euphemistically called "linear construction zones") for new developments. New roads of any type should not be allowed to access or develop future water facilities, nor should the "linear construction zones" be expanded to permit new transmission, utility, and telecommunication lines. Any construction corridors on roadless forests must be limited to existing rights-of-way.
- 4) Upper Tier Roadless Area Protection: Upper tier protections for roadless lands must be expanded and strengthened. The draft Colorado Rule provides enhanced "upper tier" protection for only 13% of Colorado roadless areas, despite the fact that well over half are known to provide exceptional wildlife habitat, important sources of clean drinking water for millions of downstream Americans, or unique and outstanding recreational opportunities. Further, loopholes put even the few "upper tier" roadless areas at risk from oil and gas development, pipelines, and transmission lines. A final Colorado Rule should ensure that all "upper tier" lands and other roadless lands have strict No Surface Occupancy stipulations to protect the entire roadless area from any future oil and gas leasing and development. These areas must not permit the use of "linear construction zones" to facilitate pipelines, transmission lines, or telecommunication facilities.

COR200

Thank you for this opportunity to provide comment. I support the protections embodied in the National 2001 Roadless Rule and do not support managing Colorado's National Forests to a lower standard. To ensure that any state-specific rule is at least as protective as this landmark conservation tool, a final rule needs to expand and strengthen the "upper tier" protections, must tighten the overly broad discretion that would allow logging far into the backcountry and building of "linear construction zones," and ensure that Colorado's oil and gas "gap leases" are not developed.

Sincerely,

Mrs. Carol Gibson-Kish  
1422 Exeter St  
North Baldwin, NY 11510-1309  
(516) 546-4439