
From: Mizner, Chris [chris@miznerenterprises.com]
Sent: Tuesday, July 12, 2011 11:46 AM
To: COcomments
Subject: Please protect our road less backcountry!
Attachments: image001.gif

I am an avid outdoorsman, businessman, father, and community steward. I am writing this note to voice my thoughts on protecting out road less backcountry.

I was born into a family of immigrants from Yugoslavia, Italy and Germany who came to America in the mid 1800's to support the mines that developed the west. From an early age my great uncles and extended family cherished the outdoor experience and I have many 150 year old photographs that show their love for the land and how it is important in shaping families. Pictures of picnics, parties celebrating the return from war, birth of new family members, getaways with friends, romantic getaways with girlfriends and future spouses show how important the natural lands are in shaping who we are and who we can be. These experiences did not always happen in developed forest areas but in more remote adventures of exploration with always the credo of leaving our environment more pristine than we find it for future generations to have a similar experience.

It is understood that the world is changing rapidly and getting smaller with every minute and with this brings increased difficulty to get away and decompress. Getting away to our natural environment within road less backcountry provides the single remaining opportunity to do this. I cannot even comprehend the possibility of this being lost to future generations. It would be a horrible selfish thing for us to do to future generations. We must respect, protect, and continue to educate untouched individuals on the importance of this great American resource in making us who we are.

I appreciate your consideration in doing all that can be done to limit roads and protect these unspoiled areas for all to enjoy now and well into the future. I say this as an avid dirt bike rider, 4 wheel drive enthusiast, backcountry hiker and fisherman, eagle scout, and member of numerous environmental groups as well as a businessman. Some people may think that these interest are in conflict with one another but what they have in common is that they are unique ways to explore the wonderful planet that we are blessed to reside upon. Thanks again for understanding the importance of taking the correct actions regarding this issue.



"Solutions with Integrity"

Mizner Enterprises

Chris Mizner

Principal

chris@miznerenterprises.com

7039 Indian Peaks Trail

Boulder, CO 80301

tel: 303 516 0016

fax: 303 516 0648

mobile: 303 517 5371

From: Extreme Power Sports [eps@resortbroadband.com]
Sent: Tuesday, July 12, 2011 9:24 AM
To: COcomments

I am not in support of any roadless rule as the forest service current management plan seems to be closer over management of responsible recreation. The forests are public ground and the public recreates in many ways both motorized and nonmotorized. The motorized users are not getting smaller in numbers but the area we have to use is which adds pressure on what areas are left.

From: Kevin Dooley [d4dooley@yahoo.com]
Sent: Tuesday, July 12, 2011 11:59 AM
To: COcomments
Subject: Colorado Roadless Backcounty

Hello,

I am writing in response to the request for public comments regarding roadless rules throughout Colorado, as identified by the U.S. Forest Service.

While I understand that access is sometimes necessary to greater the overall plans of the Forest Service, and often it is useful and benefits everyone, I also believe it can be done in a sustainable, responsible method. Whether it is through alternative deisgn procedures, hiring private consultants to design roads that will have less impact, or making a "no-build_ option available based on certain criteria, I think an outcome could be provided with a plan that everyone can agree upon and understand.

I am a long-time backpacker and angler.I believe the mountains and their waters are a precious, irreplaceable resource. I strongly urge you to work for implementation of conservation alternative #4.

Please give it the protection it needs for the future of all of those to come after us. It is important that our children and grand children can enjoy the outdoors in way that it is meant to be enjoyed. In it's natural state.

Sincerely,

Kevin Dooley
2718 W. 25th Ave.
Denver, CO 80211

From: Paul Joyce [paul@coloradowild.org]
Sent: Tuesday, July 12, 2011 12:47 PM
To: Jim Milstein
Cc: COcomments
Subject: Re: Protection of Roadless Areas

Thanks for your comments and for sharing with us Jim.

Cheers, Paul

On 7/8/2011 11:56 AM, Jim Milstein wrote:

Dear Forest Service beings,

I believe that roadless areas are an irreplaceable resource and must remain fully protected or be fully protected if they are not now. Please do not allow logging or mineral extraction in roadless areas. Don't even allow motorized recreation in roadless areas. Leave them be.

Sincerely,

Jim Milstein
329 Bross Pl
Pagosa Springs, Colorado 81147

970 731 0680

--

Paul Joyce
Colorado Wild
P.O. Box 2434
Durango, CO 81302
970-385-9833
970-769-8474
www.coloradowild.org
www.skiareacitizens.com
www.friendsofwolfcreek.org

From: Adam Bergeron [bergeron.adam@gmail.com]
Sent: Tuesday, July 12, 2011 11:05 AM
To: COcomments
Subject: Protect Colorado's Roadless Areas

Please adopt the conservation alternative!

Thank you,
Adam Bergeron

From: Franc Doyle [francd1999@hotmail.com]
Sent: Tuesday, July 12, 2011 12:11 PM
To: COcomments
Subject: protect precious and scarce resources

Greetings,

It's hard to fathom that the Forest Service continues to debate the value of protecting wilderness areas. The eternal value of prime wilderness only increases with time; the shorter term values decline over time. Please protect Colorado's roadless areas as you make decisions about how these areas will be managed. I am sure you have received countless emails with the Trout Unlimited's talking points, please listen!

Sincerely,
Frank Doyle
Denver, CO
80221

From: ChuckPyle [chuck@chuckpyle.com]
Sent: Tuesday, July 12, 2011 11:24 AM
To: COcomments
Cc: Terri Watson
Subject: The Roadless Rule

Dear Sirs

I am a Colorado outdoorsman. I fly fish and hike and bike, and use the resources this bill threatens. I understand the need for give-and-take but this is a bad bill. The upper and lower tier designation of this proposal is both inadequate and inappropriate.

There is already so much distrust of the corporate agenda, did you really think the American public would just roll over and let corporate interests compromise our wild lands and habitat? We are indignant. The habitats on your list of 'lesser' areas are too important to give to an industry that even refuses to divulge the chemicals it injects into the ground water to extract gas from shale. 'Power lines' and 'linear construction zones' mean roads! That is, roads through "upper tier" areas. Again, legislative sell-outs must think that we, the public, are stupid. No roads through an area designated as "upper tier" means, NO ROADS!

Sincerely

Chuck Pyle

From: brooks1465@aol.com
Sent: Tuesday, July 12, 2011 12:08 PM
To: COcomments
Subject: Roadless Rules

I wish to encourage you to adopt the so-called "conservation alternative", that is, the alternative that provides the highest level of protection for these public lands - lands that not only provide recreation but, more importantly in the long view, remain our incubators for clean water and air.

It may be more convenient to have access through "linear construction zones" and it may make a number of politicians and their extractive economy clients happier to avoid as much responsibility as possible for their actions, but I, for one, believe that such short term economic gains come in a distant second to the cleanest, most intact wilderness we can preserve. Besides, if we keep our headwaters clean, we can at least drown our economic sorrows in beer.

I've hiked and fished all over the state with special memories of trips off the Flat Tops and the Poudre. It might have been more convenient to have had a road to drive in those cases of beer but it was way more memorable to pack them in and the empties out on our backs. And, it was just as small reminder that there is always price for our resources and it's best if we're unable to ignore that fact.

I'm retired now and the combination of age and medical conditions limits my hiking. I don't want you to build a road for me, though. The generations which follow us must be factored in this equation and the convenient and expedient is not in their (or our) long term best interests. Do the right thing and provide the highest level of protection. If we, as a society, continue to screw up we can always pillage it in the future.

Bill Brooks
1465 S. Clayton St.
Denver, CO 80210

From: Robert Linn [robertlinn@mac.com]
Sent: Tuesday, July 12, 2011 11:04 AM
To: COcomments
Cc: Robert Linn
Subject: roadless rule

Wanted to voice my opinion on the roadless rule proposals. After almost 60 years in the outdoors as a hunter, camper, photographer, and outdoor instructor (at a younger age), I believe our forests are covered with more than enough roads, ATV trails, and 4 wheel drive trails. The largest problem today are WAY too many ATV's and motorcycles in our forests. I avoid many areas because of them. Has ruined hunting in several areas I used to go. Roadless areas are the solution. We deserve less intrusion in our forests, not more. As a member of Trout Unlimited, Ducks U., Elk foundation, I believe in protecting our vanishing resources. I support their initiatives. Please consider our wishes, not business, development. Thank you. Robert Linn

From: james hughes [hughesjm@estreet.com]
Sent: Tuesday, July 12, 2011 12:36 PM
To: COcomments
Subject: roadless area's

The simple fact that God is not creating any new wilderness or roadless area's. The proposal to reduce the roadless areas is pure folly to maintain our sanity and the viability of endangered species in the existing roadless areas we need to maintain their status and create new wilderness area's and roadless area's. With increasing pressure for quality recreation within roadless area's we need to increase the acres and add additional roadless area's to benefit of our society.

Sincerely,

James M. Hughes

From: Dan Sullivan [dsullivan@beef.org]
Sent: Tuesday, July 12, 2011 1:09 PM
To: COcomments
Subject: Roadless Colorado.

To whom it may concern,

Please keep Colorado roadless in the areas of consideration. Fishing and hunting are important to me and my state. Please protect our hunting and angling heritage and the economic opportunities they create.

Thanks,

DPS

From: Jim Hibberd [jhibberd@hoadinc.com]
Sent: Tuesday, July 12, 2011 11:31 AM
To: COcomments
Subject: ROADLESS FOREST

Please help protect our natural resources by eliminating the possibility of permanent or temporary roads and construction in the backcountry. As a backcountry enthusiast – I love to fly fish, hike, camp, backpack, xc ski, etc. – I support natural areas. I oppose any progress that may cause negative implications for the natural habitat for fish, birds, mammals and vegetation, and of course recreation. Please consider keeping the wild country wild!

Thank you,

Jim Hibberd
2123 Logan Lane
Longmont, CO 80501
303.775.5432

From: Thomas Schumacher [tschumacher10@hotmail.com]
Sent: Tuesday, July 12, 2011 12:30 PM
To: COcomments
Subject: Roadless rule

Please protect our rivers, streams, lakes, and wild game habitat at the most strict levels possible. Better yet, avoid building roads and deconstructing our state and federal lands at all. It's easy to lose sight about the long term benefits of natural habitat in the face of federal dollars but remember how much there is to lose by impairing our land and water resources for generations which can't repair themselves. That cost a lot of money too. Better to save them now I should think. Kind regards, thomas schumacher Sent from my U.S. Cellular BlackBerry® smartphone

From: Charles Seymour [charles.b.seymour@gmail.com]
Sent: Tuesday, July 12, 2011 9:42 AM
To: COcomments
Subject: We want more Wilderness areas

I'm an avid sportsman and want increased Wilderness protection on Colorado. Any effort to diminish the roadless rule will negatively impact hunting and fishing in our great state. We have plenty of roads into various national forests and certainly do not need anymore.

Charles Seymour
(303) 993-7738 (direct)
(303) 845-0200 (mobile)

From: jim mcmanigle [jim.mcmanigle@gmail.com]
Sent: Tuesday, July 12, 2011 10:50 AM
To: COcomments
Subject: Protection of our backcountry

I am writing to urge the USDA to maintain its protection of Colorado's roadless backcountry from commercial and industrial interests. Pristine wilderness and clean water is such a rarity, and to squander it due to shortsighted funding concerns would be a disservice to future generations. I spend as much time hiking and fishing wilderness areas as my schedule allows. We must not allow these areas to be lost merely due to money. I commend the USDA for their efforts to protect these national treasures for all to use. I only ask that these protections stay in place for future generations. Because once it's gone, it's gone.

Regards,
Jim McManigle

From: Erik Staub [erikstaub@gmail.com]
Sent: Tuesday, July 12, 2011 3:23 PM
To: COcomments
Subject: Keep areas protected

I am writing on behalf of all the watersheds, flora and fauna which you know will be impacted from the noise, development and harassment of off road vehicles, jeeps, 4WD, trail bikes, four and three wheelers and snowmobilers..I hunt, fish, hike, cross-country ski and snow shoe and I can only tell you from my experiences I have seen many instances of reckless, dangerous , unethical and lack of understanding of the areas they use...Rarely do they slow down for non-motorized use and the major thrill is to go for speed and the excitement of going up steep places...I feel like I am not exaggerating and I have a 4WD 4- Runner...I don't need to tell you the damage that is done to the trails and watershed by erosion and runoff by these and logging and oil exploration vehicles..Never have I seen the logging roads, mining claims restored to near pre-use areas.. I also know that 90% of lands are privately owned and less than 5 % is Wilderness and multiple unseat the USFS is heavily weighted and influenced by logging, mining, fossil fuel, grazing and ski industry with no real emphasis on the millions of recreational users who outnumber the industrial and commercial users by hundreds to one...I ask you to remember the visionaries from Roosevelt, Pinchot, Mills, Bob Marshall, John Muir,LBJ, JFK, Nixon and others who have enabled the USFS and the nation to keep the gems and our heritage..Once something is developed or paved it is lost.
Sincerely,
Erik Staub

From: Brian Rahaley [btrahaley@gmail.com]
Sent: Wednesday, July 13, 2011 8:00 AM
To: COcomments
Subject: Keep areas roadless please...

To Whom it may concern:

From my experience this weekend camping up on Laramie River Road in Colorado the need for roadless areas was heavily emphasized. The area in which we camped was full of 4 wheeling ruts and campers setting up their own firing ranges.

Please let me emphasize these points borrowed from CTU:

Provides the highest level protection for the last, best habitat for fish and wildlife in Colorado.

Prevents damaging development in upper tier areas.

The Forest Service should require a No Surface Occupancy (NSO) stipulation for oil and gas operations in "upper tier" roadless areas that keeps operators off the surface and allows these landscapes to remain healthy for fish and wildlife.

Eliminates loopholes that threaten native fish.

Thank you for your consideration.

--
Brian T. Rahaley
970.214.7736

From: Papercut Films [papercutfilms@gmail.com] on behalf of Chris Paine [chris@papercutfilms.com]
Sent: Wednesday, July 13, 2011 8:03 AM
To: COcomments
Subject: COlorado Roadless Rule/EIS - Public Comment/Chris Paine

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

Forest Service:

Please do not decrease upper-tier protection areas in Colorado. New roads and exploration don't just damage wildlife and recreation values, they also increase chances of potential damage to watersheds through hydrofracking, accidental spills, visual pollution, and other unavoidable perils of expanded roads. Please protect roadless areas.

Chris Paine
10866 Jefferson Blvd 325
Culver City, CA
chris@papercutfilms.com
310 625-6420

From: jaymtb --given-name [jaymtb@amigo.net]
Sent: Tuesday, July 12, 2011 9:38 PM
To: COcomments
Subject: Colorado Roadless Comments

Good Morning,

As a hunter and fisherman, as well as a hiker, and citizen of Colorado, I was surprised to learn that protection for roadless areas could be weakened.

The proposed Colorado Rule, recently released by the Forest Service for public comment, falls short of being as protective as the National Roadless Rule.

We are seeing wildlife habitat and stream quality being damaged by excessive motorized activity, energy development, real estate development, and impacts from population growth. I have attended many meetings on management of public lands. Never at these meetings have I seen a deer or an elk, yet the game herds are the most impacted by weakened roadless protection.

Just 11 percent of the state's Inventoried Roadless Areas are proposed for the stronger upper tier protections. Further, loopholes in those protections put even these few roadless areas at risk from oil and gas development, pipelines, and transmission lines. And the risk is even greater for roadless areas that would not be managed under an upper tier, where logging would be allowed at least a mile and a half into roadless areas.

Please see that our wild backcountry/roadless areas are protected with a rule that provides protections greater than or equal to that provided by the 2001 National Roadless Rule.

Sincerely,

Jay Gingrich

33481 County Road 373A

Buena Vista,

CO 81211

From: Rhdelves@aol.com
Sent: Wednesday, July 13, 2011 7:59 AM
To: COcomments
Subject: (no subject)

I would just like to weigh in on this Roadless business. Land without roads is certainly more likely to remain in a more pure wilderness state. That said, it is also virtually impossible to fight, suppress, or mitigate wildfire without roads. Furthermore, extraction of dead trees for biomass energy becomes impossible. I trust the USFS to find balanced solutions that allow the National Forests to be used in many ways.

Bob Delves
Telluride, Colorado

From: Benjamin Eddy [benjameddy@gmail.com]
Sent: Wednesday, July 13, 2011 8:37 AM
To: COcomments
Subject: Keep the Headwaters Roadless

The proposal to allow "Linear Corridors" in Colorado's National Forest Wilderness Areas is shortsighted.

As water sources diminish, there should be no higher priority than protecting watersheds. The headwaters of Colorado's most valuable rivers begin in the currently roadless areas. As you're well aware, construction of pipelines, utility corridors, logging roads, etc., have an out-sized impact on water quality. Why would the Forest Service threaten that to accommodate commercial interests? There are alternatives for commerce; pipelines can be re-routed, but the rivers don't have a choice where they run. Better to spend a little more to avoid valuable watershed areas, than save in the short term by threatening water supplies.

Colorado is Colorado because of its wild areas--it's roadless wilderness areas. It's hard to quantify the value of wilderness areas, but in terms of tourism, quality of life, ecosystem services, fish and game and others, I suspect the value is in the billions.

"Multi-use" is a nice concept, and one that people agree with, but the balance of environment and progress is tipped far in favor of progress, especially in National Forests. Compromise these wilderness areas, and I promise, this administration won't be forgiven. Why do we have Democrats if their environmental policies can't be distinguished from the Bush era?

Beesechingly,

Ben Eddy
Denver, CO

From: azkrieg4wildland@aol.co.uk
Sent: Wednesday, July 13, 2011 5:13 AM
To: COcomments
Subject: roadless areas

I hunt and fish in Colorado and support all roadless area protection 100% A Krieg

From: Peter Judkins [pgj8890@comcast.net]
Sent: Wednesday, July 13, 2011 6:16 AM
To: COcomments
Subject: Roadless Area

This is super important for future generations; once it is gone it's gone. Please protect these lands.

Colorado's roadless backcountry deserves the highest level of respect and protection. These pristine lands are irreplaceable.

PLease be resposible stewards,

Peter Judkins
2740 Iliff Street
Boulder Co 80305

From: Jerry Smith [onejerrysmith@gmail.com]
Sent: Tuesday, July 12, 2011 1:13 PM
To: COcomments
Subject: Comments on the Colorado Roadless Rule
Attachments: Colorado Roadless Rule comments.docx

Please find attached and below my comments on the Colorado Roadless Rule.

Colorado Roadless Rule/ EIS,

P.O. Box 1919, Sacramento, CA

95812

To whom it may concern,

I write to comment on the proposed Colorado Roadless Rule / EIS and to question the whole intent of this entire process.

In the first place, Congress and only Congress is responsible for creating designated Wilderness. Though not designated Wilderness, these "Roadless" areas are managed the same as if they were.

In the second place, after over 30 years of asking for the Definition of a Road of Forest Service offices and Bureau of Land Management, I can find no clear answer.

You would think that would be the very first question when designating a particular area a "Roadless Area".

How many lawsuits have been fought over these lands and their use and there still is no firm answer to that question.

For that reason, I have researched many USFS and BLM documents to find any kind of wording or definition describing what a Road is. My conclusions and a clear answer to that question are below.

It is my sincere wish that this Definition of a Road be taken into consideration for this and any future studies of Roadless Areas and Wilderness Areas.

In looking at the present condition of the Colorado National Forests, it seems very plain that the current management practices of the USFS are failing in a major way.

It is my opinion and has been echoed by many I have spoken to about the subject, that the USFS personnel are overwhelmingly pro-active in the "Conservationist" or "Preservationist" movement and that the few who are not, are abused and seldom listened to in a cordial manner.

This is why the management of our National Forests is failing in such a major way. Any government agency managed by radicals is going to fail. It doesn't matter from which side of the argument, it is going to fail.

I know that this will be met with great wrath by most who read it or hear of it, and I submit that this attitude is exactly what I say is wrong with the USFS. The truth is sometimes hard to live with when you live in and work in a radical environment. It is way past time for the USFS to begin hiring people who will balance the agencies' Personnel roster and for the agency to be managed in a balanced way.

Again, please consider this for the long term health of our public lands.

Sincerely,

Jerry L. Smith

Please see and consider the Definition of a Road below.

An attachment to "Colorado Roadless Rule comments" submitted by:

Jerry Smith

2322 Hwy 6 & 50 #51

Grand Jct., CO 81505

Member of:

Grand Mesa Jeep Club; Colorado Association of 4 Wheel Drive Clubs; United Four Wheel Drive Associations; Blue Ribbon Coalition; COHVCO; and Utah Shared Access Alliance

Below please find proposed Definitions of "Road", "Primitive Road", "Motorized Trail", and "Non-Motorized Trail" for consideration as terms used by the USFS to manage public lands.

These definitions have been expanded from terms and "definitions" currently used by both the USFS and BLM to determine what a "Road" is.

The current “definitions” are much too vague to define anything of substance and leave “interpretation” by individuals who, according to most knowledgeable people, have highly questionable qualifications to make that determination on their own according to their personal prejudices.

Clear definitions of terms such as these make for better communication and understanding. This also will decrease the need for so many law suits to determine every little argument. We hope this example will inspire an equal effort on the part of the BLM to define other vague terms in its management practices.

We hope you will consider the following as a guideline for these important terms.

Thank you for your consideration.

Jerry Smith

A “Road” is:

- A linear route managed for use by low-clearance vehicles.
- Maintained for regular and continuous use
- A two track (or more) way of sufficient width to accommodate a full-size average American pickup truck, SUV, or “Jeep” type vehicle.
- A way that was constructed by means of heavy equipment (bulldozer, motor grader, excavator, backhoe, tractor, etc.)
- Does NOT require constant or repeated mechanical maintenance. May be used commercially and/or for recreation
- May have some or all of the following characteristics:
 - Side drainage ditching
 - Side rows or “berm(s) of dirt and/or rock
 - Cuts into a side hill
 - Steep grade(s)
 - Off-camber site(s)
 - A “dug-way” or shelf into a cliff face or hill/ mountain side
 - Primitive surfaces including but not limited to:
 - Environmental damage
 - Large rocks fallen onto its surface
 - Deep cuts from natural run-off or flooding
 - Encroaching underbrush growing into or from the way
 - Landslide(s)
 - Wet or dry wash crossing(s)
 - Stream or river crossing(s)
 - Other natural obstacle(s)

“roads which have been improved and maintained by mechanical means” to insure relatively regular and continuous use shall not be interpreted to mean “needing constant and/or repeated” maintenance by mechanical means to remain open for use.

The simple construction by means of heavy equipment is sufficient to qualify as having “*been improved and maintained by mechanical means* to insure relatively regular and continuous use”.

A **“Primitive Road”** (Commonly known as a “Jeep road”) is:

- A linear route managed for use by four-wheel drive or high-clearance vehicles.
- Primitive roads do not necessarily meet any governmental road design standards.
- A primitive two track (or more) way of sufficient width to accommodate a full-size average American pickup truck, SUV, or “Jeep” type vehicle.
- Was pioneered solely by means of vehicle use, or heavy equipment, and/or manual labor
- Does NOT require nor receive constant or repeated mechanical maintenance.
- May have some or all of the following:
 - Steep grade(s)
 - Ledges or “waterfalls”
 - Environmental damage
 - Large rocks fallen onto its surface
 - Deep cuts from natural run-off or flooding
 - Off-camber site(s)
 - Encroaching underbrush growing into or from the way surface
 - Landslide(s)
 - Wet or dry wash crossing(s)
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A **“Motorized Trail”** is:

A single or double track route managed to accommodate Hiker(s), bicycle(s), horse(s), motorcycle(s), ATV(s), or “side-by-side” vehicles not over 50” overall width.

OR have two track ways of sufficient width to accommodate a motorized vehicle or machine not exceeding 50” in outside width

- A way that was constructed by way of heavy equipment (bulldozer, motor grader, excavator, backhoe, tractor) manual labor, and /or by simple repeated use, etc.

- Does NOT require constant or repeated mechanical maintenance May have some or all of the following:
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 - Environmental damage
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 - Deep cuts from natural run-off or flooding
 - Off-camber site(s)
 - Encroaching underbrush growing into or from the way surface
 - Landslide(s)
 - Wet or dry wash crossing(s)
 - Stream or river crossing(s)
 - Other natural obstacle(s)

A “Non-Mechanized Trail” is:

- A single track lineal route managed to accommodate Hiker(s), and/or horse(s) traffic only.
- May or may not meet any governmental trail design standards.
- Was pioneered by simple repeated use or by manual labor.
- Does not require nor receive constant or repeated maintenance.
 - May have some or all of the following:
 - Steep grade(s)
 - Ledges or “waterfalls”
 - Environmental damage
 - Large rocks fallen onto its surface
 - Deep cuts from natural run-off or flooding
 - Off-camber site(s)
 - Encroaching underbrush growing into or from the way surface
 - Landslide(s)
 - Wet or dry wash crossing(s)
 - Stream or river crossing(s)
 - Rock outcroppings
 - Other natural obstacle(s)

Jerry L Smith
2322 Hwy 6 & 50 #51
Grand Jct., CO 81505-1353
onejerrysmith@gmail.com

Comments on the Colorado Roadless Rule / EIS

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

To whom it may concern,

I write to comment on the proposed Colorado Roadless Rule / EIS and to question the whole intent of this entire process.

In the first place, Congress and only Congress is responsible for creating designated Wilderness. Though not designated Wilderness, these "Roadless" areas are managed the same as if they were.

In the second place, after over 30 years of asking for the Definition of a Road of Forest Service offices and Bureau of Land Management, I can find no clear answer.

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How many lawsuits have been fought over these lands and their use and there still is no firm answer to that question.

For that reason, I have researched many USFS and BLM documents to find any kind of wording or definition describing what a Road is. My conclusions and a clear answer to that question are below.

It is my sincere wish that this Definition of a Road be taken into consideration for this and any future studies of Roadless Areas and Wilderness Areas.

In looking at the present condition of the Colorado National Forests, it seems very plain that the current management practices of the USFS are failing in a major way.

COR524

Jerry L Smith
2322 Hwy 6 & 50 #51
Grand Jct., CO 81505-1353
onejerrysmith@gmail.com

Comments on the Colorado Roadless Rule / EIS

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Again, please consider this for the long term health of our public lands.

Sincerely,

Jerry L. Smith

Please see and consider the Definition of a Road below.

Jerry L Smith
2322 Hwy 6 & 50 #51
Grand Jct., CO 81505-1353
onejerrysmith@gmail.com

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Jerry Smith

2322 Hwy 6 & 50 #51

Grand Jct., CO 81505

Member of:

Grand Mesa Jeep Club; Colorado Association of 4 Wheel Drive Clubs;
United Four Wheel Drive Associations; Blue Ribbon Coalition; COHVCO;
and Utah Shared Access Alliance

Below please find proposed Definitions of "Road", "Primitive Road", "Motorized Trail", and "Non-Motorized Trail" for consideration as terms used by the USFS to manage public lands.

These definitions have been expanded from terms and "definitions" currently used by both the USFS and BLM to determine what a "Road" is.

The current "definitions" are much too vague to define anything of substance and leave "interpretation" by individuals who, according to most knowledgeable people, have highly questionable qualifications to make that determination on their own according to their personal prejudices.

Clear definitions of terms such as these make for better communication and understanding. This also will decrease the need for so many law suits to determine every little argument. We hope this example will inspire an equal effort on the part of the BLM to define other vague terms in its management practices.

We hope you will consider the following as a guideline for these important terms.

Thank you for your consideration.

Jerry Smith

Jerry L Smith
 2322 Hwy 6 & 50 #51
 Grand Jct., CO 81505-1353
onejerrysmith@gmail.com

Comments on the Colorado Roadless Rule / EIS

A "Road" is:

- A linear route managed for use by low-clearance vehicles.
- Maintained for regular and continuous use
- A two track (or more) way of sufficient width to accommodate a full-size average American pickup truck, SUV, or "Jeep" type vehicle.
- A way that was constructed by means of heavy equipment (bulldozer, motor grader, excavator, backhoe, tractor, etc.)
- Does NOT require constant or repeated mechanical maintenance. May be used commercially and/or for recreation
- May have some or all of the following characteristics:
 - Side drainage ditching
 - Side rows or "berm(s) of dirt and/or rock
 - Cuts into a side hill
 - Steep grade(s)
 - Off-camber site(s)
 - A "dug-way" or shelf into a cliff face or hill/ mountain side
 - Primitive surfaces including but not limited to:
 - Environmental damage
 - Large rocks fallen onto its surface
 - Deep cuts from natural run-off or flooding
 - Encroaching underbrush growing into or from the way
 - Landslide(s)
 - Wet or dry wash crossing(s)
 - Stream or river crossing(s)
 - Other natural obstacle(s)

"roads which have been improved and maintained by mechanical means" to insure relatively regular and continuous use shall not be interpreted to mean "needing constant and/or repeated" maintenance by mechanical means to remain open for use.

The simple construction by means of heavy equipment is sufficient to qualify as having *"been improved and maintained by mechanical means to insure relatively regular and continuous use"*.

Jerry L Smith
2322 Hwy 6 & 50 #51
Grand Jct., CO 81505-1353
onejerrysmith@gmail.com

Comments on the Colorado Roadless Rule / EIS

A "Primitive Road" (Commonly known as a "Jeep road") is:

- A linear route managed for use by four-wheel drive or high-clearance vehicles.
- Primitive roads do not necessarily meet any governmental road design standards.
- A primitive two track (or more) way of sufficient width to accommodate a full-size average American pickup truck, SUV, or "Jeep" type vehicle.
- Was pioneered solely by means of vehicle use, or heavy equipment, and/or manual labor
- Does NOT require nor receive constant or repeated mechanical maintenance.
- May have some or all of the following:
 - Steep grade(s)
 - Ledges or "waterfalls"
 - Environmental damage
 - Large rocks fallen onto its surface
 - Deep cuts from natural run-off or flooding
 - Off-camber site(s)
 - Encroaching underbrush growing into or from the way surface
 - Landslide(s)
 - Wet or dry wash crossing(s)
 - Stream or river crossing(s)
 - Other natural obstacle(s)

"roads which have been improved and maintained by mechanical means" to insure relatively regular and continuous use **shall not be interpreted to mean "needing constant and/or repeated" maintenance by mechanical means to remain open for use.**

The simple construction by means of heavy equipment is sufficient to qualify as having *"been improved and maintained by mechanical means* to insure relatively regular and continuous use".

Jerry L Smith
2322 Hwy 6 & 50 #51
Grand Jct., CO 81505-1353
onejerrysmith@gmail.com

Comments on the Colorado Roadless Rule / EIS

A "Motorized Trail" is:

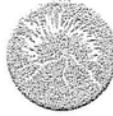
- A single or double track route managed to accommodate Hiker(s), bicycle(s), horse(s), motorcycle(s), ATV(s), or "side-by-side" vehicles not over 50" overall width.
- **OR** have two track ways of sufficient width to accommodate a motorized vehicle or machine not exceeding 50" in outside width
 - A way that was constructed by way of heavy equipment (bulldozer, motor grader, excavator, backhoe, tractor) manual labor, and /or by simple repeated use, etc.
 - Does NOT require constant or repeated mechanical maintenance
May have some or all of the following:
 - Side drainage ditching
 - Side rows or "berm(s) of dirt and/or rock
 - Cuts into a side hill
 - Steep grade(s)
 - A "dug-way" or shelf into a cliff face or hill/ mountain side
 - Primitive surfaces including but not limited to:
 - Environmental damage
 - Large rocks fallen onto its surface
 - Deep cuts from natural run-off or flooding
 - Off-camber site(s)
 - Encroaching underbrush growing into or from the way surface
 - Landslide(s)
 - Wet or dry wash crossing(s)
 - Stream or river crossing(s)
 - Other natural obstacle(s)

Jerry L Smith
2322 Hwy 6 & 50 #51
Grand Jct., CO 81505-1353
onejerrysmith@gmail.com

Comments on the Colorado Roadless Rule / EIS

A “Non-Mechanized Trail” is:

- A single track lineal route managed to accommodate Hiker(s), and/or horse(s) traffic only.
- May or may not meet any governmental trail design standards.
- Was pioneered by simple repeated use or by manual labor.
- Does not require nor receive constant or repeated maintenance.
 - May have some or all of the following:
 - Steep grade(s)
 - Ledges or “waterfalls”
 - Environmental damage
 - Large rocks fallen onto its surface
 - Deep cuts from natural run-off or flooding
 - Off-camber site(s)
 - Encroaching underbrush growing into or from the way surface
 - Landslide(s)
 - Wet or dry wash crossing(s)
 - Stream or river crossing(s)
 - Rock outcroppings
 - Other natural obstacle(s)



CRESTED BUTTE
MOUNTAIN RESORT

July 12, 2011

Via Electronic Mail and Electronic Upload

Colorado Roadless Rule/EIS
P.O. Box 1919
Sacramento, California 95812
Electronic Mail: COComments@fsroadless.org
Electronic Upload: <http://www.regulations.gov>

Re: Comments of Crested Butte Mountain Resort in Support of 2011
Proposed Colorado Roadless Rule and Draft Environmental Impact
Statement

Dear Forest Service:

Crested Butte Mountain Resort ("CBMR") submits these comments in support of the proposed Colorado Roadless Rule ("Colorado Roadless Rule") and draft environmental impact statement ("Draft EIS"). Please add these comments to the administrative record and please send me a copy of the final environmental impact statement when it is available.

Interest of CBMR in the Colorado Roadless Rule

CBMR operates Crested Butte Mountain Resort under special use authorization from the Grand Mesa, Gunnison, and Uncompahgre National Forest in Gunnison County, Colorado. The Forest Service issued the special use permit for the ski area in 1961. Since then, CBMR has provided outstanding four season recreation to millions of visitors under managed conditions that protect the environment.

CBMR's special use permit area includes Snodgrass Mountain, an area that the Forest Service added to CBMR's special use permit in 1982. The applicable Forest Plan designates Snodgrass Mountain as Management Area 1B for developed skiing. CBMR has an interest in the Colorado Roadless Rule because the 2001 Roadless Rule identified the Gothic inventoried roadless area in the GMUG National Forest. Part of the Gothic inventoried roadless area extends onto Snodgrass Mountain. See Draft EIS, Appendix F at F-6.

CBMR has participated in the development of the proposed Colorado Roadless Rule, including by submitting detailed written comments in October 2008 on the Forest

Colorado Roadless Rule/EIS
Comments of Crested Butte Mountain Resort, Inc.
July 12, 2011
Page 2

Service's 2008 Draft EIS for the Colorado Roadless Rule, and in September 2009 when the State of Colorado invited comments on its revised petition for a Colorado Roadless Rule.

CBMR Supports the Colorado Roadless Rule

CBMR strongly supports the Colorado Roadless Rule, which is Alternative 2 in the Draft EIS. CBMR urges the Forest Service to adopt it in final form after preparing a final environmental impact statement.

The Colorado Roadless Rule is good policy for National Forest System lands in Colorado. It will conserve approximately 4.186 million acres of Colorado roadless areas and protect important natural resources such as clean water, wildlife habitat, diversity of plant and animal species, and open spaces.

The Colorado Roadless Rule also accommodates skiing and snowboarding on National Forest System lands, an activity that is vital to the economies and lifestyles of Crested Butte, Gunnison County, and other mountain towns in Colorado. The Colorado Roadless Rule allows for high quality managed recreation within the relatively small amount of roadless areas that are inside ski area special use permits by removing such lands from roadless status. This aspect of the Colorado Roadless Rule clarifies that ski areas may use lands already allocated to ski area special use permits for developed skiing by the Forest Service for future expansion. See Draft EIS at 234-235. That was the Forest Service's intent when it issued ski area permits for those lands and allocated the same lands to skiing in Forest Plans. The Colorado Roadless Rule makes that intent clear by removing those lands from roadless status.

The Colorado Roadless Rule is a model of public involvement in public lands decision-making. The Rule is the product of an exhaustive public process that incorporated local, state, and national points of view. The Colorado Roadless Areas Review Task Force conducted sixteen public meetings and reviewed over 40,000 public comments. Citizens from Colorado and across the United States participated. The Task Force made recommendations about individual Colorado roadless areas and site conditions. Two consecutive Colorado Governors petitioned the Forest Service to adopt those recommendations, and their successor, Governor John Hickenlooper, supports the Colorado Roadless Rule.

CBMR compliments the Forest Service on its work. After reviewing the Draft EIS and the Federal Register preamble to the Colorado Roadless Rule, it is apparent to CBMR that the Forest Service has fine tuned and refined the Rule and the environmental

Colorado Roadless Rule/EIS
Comments of Crested Butte Mountain Resort, Inc.
July 12, 2011
Page 3

analysis of it based on multiple rounds of public comments. The multiple comment opportunities provided by the Forest Service and by the State of Colorado are a significant factor in favor of the Colorado Roadless Rule.

* * *

CBMR strongly supports the Colorado Roadless Rule, Alternative 2, and urges the Forest Service to adopt it after it prepares a final environmental impact statement. Thank you for this opportunity to comment.

Sincerely,



Michael Kráatz
Vice President Resort Planning & Development
Crested Butte Mountain Resort, Inc.

From: MaryJo Somrak [msomrak@cbmr.com]
Sent: Tuesday, July 12, 2011 2:35 PM
To: COcomments
Cc: Michael Kraatz
Subject: FW: Administration Kyocera
Attachments: doc20110712163054.pdf

-----Original Message-----

From: Admin_Kyocera@cbmr.com [mailto:Admin_Kyocera@cbmr.com]
Sent: Tuesday, July 12, 2011 4:31 PM
To: MaryJo Somrak
Subject: Administration Kyocera

TASKalfa 500ci
[00:c0:ee:7a:50:24]

From: Katherine Haase [KHaase@gunnisoncounty.org]
Sent: Tuesday, July 12, 2011 4:04 PM
To: COcomments
Cc: Bobbie Lucero
Subject: Gunnison County Comments; Colorado Roadless Rule
Attachments: 20110712, Colorado Roadless Rules-EIS.PDF

Importance: High

Dear Sirs,

The attached correspondence will also be sent via postal mail today.

Much thanks,
Katherine

Katherine Haase

Assistant to the County Manager & Clerk to the BOCC
Gunnison County Administration
200 E. Virginia; Gunnison, CO 81230
Phone: (970) 641-7601; Fax: (970) 641-3061
www.GunnisonCounty.org

"Gunnison County cherishes its sense of community and place. We strive to preserve and promote the well-being of the County's citizens, natural environment and rural character. We will deliver services and set standards that reflect our values and preserve our unique quality of life for present and future generations to enjoy."

COR526



Gunnison County Board of County Commissioners

Phone: (970) 641-0248 • Fax: (970) 641-3061

Email: bocc@gunnisoncounty.org • www.GunnisonCounty.org

July 12, 2011

US first class mail and email:
COComments@fsroadless.org

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

Re: Colorado Roadless Rule

To Whom It May Concern:

The Board of County Commissioners of Gunnison County, Colorado respectfully submits the following comments regarding the proposed EIS for the above project.

Gunnison County has designated the North Fork Valley Coal Resource Special Area and has adopted the Coal Resource Special Area Coal Mining Regulations. In those Regulations, Gunnison County recognizes that coal is a resource valuable to the United States, Colorado and Gunnison County that deserves to be extracted and put to use.

To that end Gunnison County supports aspects of Alternative 2 that support the ability of coal companies to access areas for venting underground mines for miner safety and continued operation. Gunnison County also supports exploring options to recover methane from active and inactive coal mines and urges that access to these sites be considered in the rule.

In addition, we support provisions in the various alternatives that keep currently undeveloped roadless areas free from industrial uses. Gunnison County's primary economy is based on recreational tourism. Allowing new roads in those areas of the county which are currently roadless will harm the continued viability of that economy.

Please help protect our coal mining and tourism economy in your deliberations on the Colorado Roadless Rule.

Sincerely,

Three handwritten signatures in black ink are written over a horizontal line. The signatures are cursive and somewhat stylized. Below each signature is a printed name and title.

Hap Channell
Chairperson

Paula Swenson
Vice-Chairperson

Phil Chamberland
Commissioner

From: David Jacobson [david@cowordsandpictures.com]
Sent: Tuesday, July 12, 2011 4:32 PM
To: COcomments
Subject: Roadless comments...
Attachments: Page_E.pdf; Gibson Gulch graph.pdf; Page_A.pdf; Page_B.pdf; Page_C.pdf; Page_D.pdf

All information is attached.

Thank you,

David

David J. Jacobson
Producer
Words & Pictures
970-527-4267-direct
925-890-1034-cell
www.cowordsandpictures.com
david@cowordsandpictures.com

Why the 600 ft Setback Around Existing Roads in the Colorado Roadless Rule Inventory Must be Eliminated

This comment applies to any Colorado IRA with an existing road(s) which has a 600 ft. setback- 300 ft. or one football field-to either side, within which there are no roadless protections. It's just ordinary Forest Service land.

I- Bomb on the Shelf in Colorado Roadless Rule

If existing post 2001 leases in the IRAs were invalidated by the courts in upholding the Clinton 2001 rule, or if the leaseholders simply walked away from expiring 2002-2003 leases because they were uneconomic, or if the leases were eliminated for any other reason, would IRAs would be free of the threat of drilling since the CRR prohibits future leasing after enactment?

No, because there a huge bomb on the shelf waiting to go off: There is a 600 ft wide setback around existing roads in IRAs which is ordinary National Forest land without the CRR re-leasing ban. Therefore, the land within the setback could be re-leased by any future national administration. When natural gas prices go back up, it's likely that gas drillers would nominate this land, since there's plenty of acreage to site wellpads merely within the setback: One football field to either side of existing roads, running the entire length of the road. Plus easy access to the pads via the existing road which would merely need upgrading.

This affects all IRAs with existing roads, but particularly Springhouse Park, which has two roads--Buck Mtn Trail #804 and Thousand Acre Flats Trail, which penetrate to the core of the large IRA, just about all of which--17,000 acres--has been leased. With, say, one wellpad every half mile, that would provide for 12 pads along Buck Mtn # 804 alone, from which a majority of the IRA to the north and south could be directionally drilled.

If that happened, the public--which also uses the same roads--would enjoy Springhouse Park from an industrial corridor of rigs, pipes, tanks and noisy compressor stations. (The resource underneath is coalseam gas, which must be compressed to suck it out of the ground.)

II It's a giveaway to the natural gas drillers By saving them costs they can't afford

1. The setback doesn't concentrate *inevitable* drilling as GMUG NF officials apparently think, but it **actually makes possible drilling programs that would otherwise not happen.**

These are general comments, but focus on Springhouse Park: It's most at risk and has highest value--

--17000 Acres leased, almost all by Petrox which has already issued comprehensive 20 well drilling program

--This is 2d largest # of leases in all GMUG IRAs, these were all leased 2002-2003, thus are close to expiration and subject to immediate Petrox effort to hold &/or develop.

--There are 2 roads going to center of IRA, easy access that the 600 ft setback makes even easier.

--Here is high recreational value to be lost w/ gas drilling: Close to North Fork, old growth Aspen, little SAD, long distance views of mtns around Anthracite Pass, the 2 roads make recreation access easy also.

2. Why the Drilling is Not Inevitable. It's Not Realized how thin is Petrox Economic Margin, how just a small increase in costs would push them over edge. Consider how Garfield County drilling economics, in center of Piceance Basin, nicely survived the crash in natgas prices to \$4/Mcf, in 2009-2011, but Gunnison County (Springhouse Park) economics did not.

The table on the next page in the right column shows the source of the 2007 Gunnison County cost and profit numbers from a report by Bill Barrett Co. on their Gibson Gulch field five miles SE of Silt. The following page shows how those Garfield County numbers changed in 2011, compared to 2011 numbers for Gunnison County-Springhouse Park.

Garfield Co Economics

<i>2007</i>		<i>2011</i>
Denver natgas price	\$6.83	\$4.00
Gas Liquids	0.83	3.00 went up with oil
Realized Price/Mcf	\$7.66	\$7.00
Lease Operating Costs + Pipelines: Gathering & Garfield Co-Denver	(0.92)	(0.92)
Taxes	(0.45)	(0.45)
Gross Margin Cash	\$6.29	\$5.63
Drilling Cost/Mcf	\$2.34	(\$2.34)
Net Margin	\$3.95	\$3.29 <i>Very Close--Saved by the Gas Liquids</i>

Gunnison Co Economics 2011 Springhouse Park

Denver NatGas Price/Mcf	\$4.00
NatGas Liquids/Mcf	\$0.00
Realized Price/Mcf	\$4.00
Costs: Lease Operating + Gathering & Pipeline fee Garfield Co to Denver	(0.92) <i>Generous--Costs higher in Springhouse Park</i>
Pipeline: Springhouse Park to Garfield Co: Bull Mtn & Sheep Pipe line fees	(0.30)
Taxes	(0.45)
Gross Margin-Cash Flow	\$2.33
Drilling Cost/Mcf	(\$2.34) <i>Generous--costs higher in Springhouse Park</i>
Net Margin	(0.01)

Garfield Co survived the crash of gas prices to \$4/Mcf due to bonus of natgas liquids (NGLs): 3-4 gal/Mcf @ \$1. **Gunnison Co did not:** Springhouse Park's gas producing formation is coalseams, which are bone dry.

What you've just seen is worse than it looks...

-Coalseam gas takes time to start producing: Dewatering for up to a year, plus slow incline to a plateau vs conventional gas like that in Garfield Co. which starts up at a high level. Coal gas makes you wait, so has a lower present value. Coal gas operating costs are higher: requires compression to suck gas out of wellbore.

Upshot--nobody, but nobody is drilling for coalgas nationwide w/ \$4 prices for dry gas.

--Costs have been made the same and held constant in above table 2007-2011 for both Garfield & Gunnison, but actual costs in Springhouse Park would be much higher due to distance from service & supply infrastructure, contrasted with Garfield Co. where it's all right around the corner.

3. What Does Petrox Do? Cut Costs wherever it can. The 600 ft Setback is a Huge Advantage for Them:

--The two roads give ready made cheap access to the heart of the lease bloc. The main road is boggy (see photos) but w/ no roadless protection due to 600 ft setback, both roads can be upgraded under ordinary FS standards. Two football fields of setback for the entire length of both roads leaves plenty of acres with no roadless protection to site well pads-conveniently, right in the only place Petrox can afford.

—*But if there were no setback, roadless protections would give FS the authority to deny such massive upgrading, forcing Petrox to carve entirely new roads thru drier ground, if it was available. FS cannot deny leaseholder access if there are no NSO strips, but w/ roadless protections, FS would have maximum leverage to control such access to protect sensitive wetlands. Petrox response would be:*

"This is the last straw. We can't afford this cost, too. Let uneconomic leases expire in 2012-13."

4--Petrox Alternatives--Which the 600 ft Setback Also Makes Possible

--a-**Wait for gas prices to go up.** Seek to unitize leases, allow to hold whole block w/ just one or minimal # of wells drilled to establish production. Alas, *same result: 600 ft setback is a unitizer's dream: Allows upgrading of just part of existing main road to site one well in center of leasehold. No company could afford building a new road just to drill one well.*

--b- **Sell Springhouse Park leases to GE/SG who enjoy lower cost leverage.**

They own Bull Mtn/Sheep pipelines, can save 30c/Mcf in pipeline fees. *Same result once again: GE/SG uses same advantage of being able to upgrade one of the two existing roads, w/ no roadless protections, to get access for one centrally located well to unitize all the acres.*

COR 527

David Jacobson
229 Grand Ave.
Suite 1A
Paonia, CO 81428
david@cowordsandpictures.com
970-527-4267

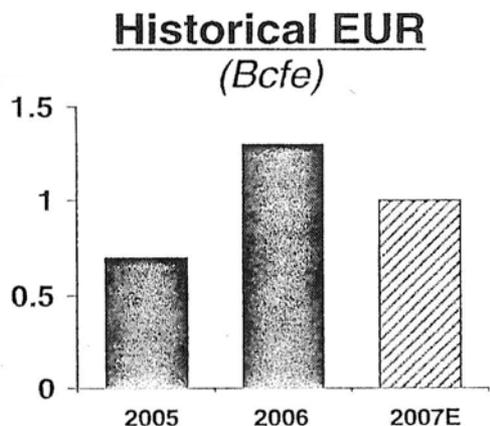
Piceance Basin - Gibson Gulch

Williams Fork - Colorado

Illustrative Drilling Costs

	<u>Bcfe</u>
EUR (gross)*	1.0
NRI	81%
EUR (net)	0.81
	<u>\$, millions</u>
Drilling	\$ 0.7
Completion	<u>1.2</u>
Total	<u>\$1.9</u>
Incremental drilling cost (per Mcfe)	<u>\$2.34</u>

**20-acre and estimated 10-acre*



Illustrative Economics

Gas Price (Rockies strip) ¹	\$ 6.83
MMBtu/ sales adjustment - Gas Liquids	<u>0.83</u>
Realized Price (per Mcfe)	\$ 7.66
LOE, Gathering & Transportation	(0.92)
Production taxes	<u>(0.45)</u>
Gross margin (cash flow)	\$ 6.29
Incremental drilling cost (per Mcfe)	<u>(2.34)</u>
Net Margin	\$ 3.95
ROR	<u>30%</u>
CIG Price Required 10% ROR	\$ 4.90

¹ Rockies strip through 2010 as of August 10, 2007 - \$6.83

For illustrative purposes only, does not represent formal guidance
(See "Forward-Looking and Other Cautionary Statements" on slide 2)

002527

From: Craig Grother [craiggrother@yahoo.com]
Sent: Tuesday, July 12, 2011 8:47 PM
To: COcomments
Subject: Formal Comment Letter
Attachments: 7_11 Comment Letter.doc

Please accept the attached letter as my formal comments on the proposed Colorado Roadless Rule. I would appreciate it if you would notify me of receiving this email and attachment and notify me of any future opportunities for comment and/or publication of the final Record Of Decision.

Craig Grother
PO Box 156
Norwood, CO 81423

craiggrother@yahoo.com

Comments on the Proposed
Colorado Roadless Rule

July 12, 2011

The Honorable Tom Vilsack
Secretary
U.S. Department of Agriculture
1400 Independence Ave., S.W.
Washington, DC 20250

Tom Tidwell
Chief
U.S. Forest Service
1400 Independence Ave., S.W.
Washington, DC 20250

Dear Mr. Secretary and Chief Tidwell:

I am writing to you to express my opinions on the Proposed Colorado Roadless Rule. I am especially interested in National Forest System lands on the Grand Mesa, Uncompahgre, and Gunnison (GMUG) National Forests. I live near the town of Norwood, Colorado where I have recently retired from the US Forest Service after 33 years of service. The last 20 years of my career were spent on the Norwood and Ouray Ranger Districts of the GMUG as the zone Wildlife Biologist. During that time I worked very closely with the Bureau of Land Management, Colorado Division of Wildlife, and sportsmen's organizations such as the Rocky Mountain Elk Foundation, Mule Deer Foundation, and the Bighorn Sheep Society to ensure quality habitats for fish and wildlife on our public lands while providing a variety of fishing and hunting opportunities for the public.

I am also an avid hunter and backcountry recreationist that is concerned about the loss of our public wildlands and roadless areas to resource development and uncontrolled off highway vehicle (OHV) use. I feel it is vitally important to retain and restore unroaded landscapes and wildlife habitat for the perpetuation of our big game herds and to provide solitude and quiet use opportunities for people. For these reasons I am also a member of the Colorado Backcountry Hunters and Anglers (BHA) organization, serving as the Forest Watchmen for the Uncompahgre. BHA is a grassroots organization of sportsmen and women who are united by a passion to protect and conserve the public-lands forests, mountains, prairies, streams, and lakes that support our hunting and angling traditions.

BHA members share a deep concern that the traditional backcountry values - solitude, silence, personal challenge, physical fitness, adventure - which make hunting and fishing so special, are being lost to habitat destruction from resource and recreation development and motorized abuse and over-use of our public lands. BHA works to slow these destructive trends in order to protect our outdoor heritage and assure that future generations of hunters and anglers can enjoy the same genuine back-to-nature opportunities we know today. We believe in managing fish, wildlife, and their habitats as a public trust and a priceless resource. We believe in keeping undeveloped public lands truly wild.

As both a professional Wildlife Biologist and a member of the Colorado Backcountry Hunters & Anglers I want to voice my full support for the "Sportsmen's Solutions"

submitted to you collectively by Backcountry Hunters & Anglers, Bull Moose Sportsmen Alliance, Colorado Backcountry Hunters & Anglers, Colorado Trout Unlimited, Colorado Wildlife Federation, National Wildlife Federation, Theodore Roosevelt Conservation Partnership, Trout Unlimited, and Western Native Trout Initiative. I believe the solutions provided in this letter will resolve the problems currently in the regulatory language in the proposed rule.

There are volumes of scientific studies that demonstrate the adverse effects of roads and human activities on big game. As one example, exhaustive studies have been conducted on the US Forest Service's Sharkey Experimental Forest and Range in Oregon that clearly demonstrate the impact of various human activities on elk and mule deer. Spanning 40 square miles of prime elk habitat in the Blue Mountains of Oregon, Sharkey has enabled ecologists to study wildlife and range on a landscape scale for the past 20 years. During the Sharkey project, Michael Wisdom (2002-2004) researched the effects of ATV's, mountain bikes, horses, and hikers on collared elk. The results of the study were telling. Elk ran faster and farther when encountering humans on ATV's or mountain bikes than on horses or afoot. And the elk stayed gone. The study also showed that elk kept on the move even when ATV's or mountain bikes had left.

The results of the other studies are very similar. The experiences I and other public land and wildlife managers have had in our careers further support the findings of these studies. It is clear that large tracts of unroaded and undeveloped habitats have a profound affect on big game distribution and are vital to the health and productivity of our big game herds. It is also very clear that motorized vehicles and resource management activities associated with oil and gas development, utility lines, and timber harvest/fuels treatments affect big game populations, security, distribution, and reduce habitat effectiveness. The Forest Service needs to utilize this science and the experience of professionals in developing its preferred alternative.

The following are my specific recommendations for an expanded upper tier category of lands that should be included in the preferred alternative to benefit fish, wildlife, and our enjoyment of these resources as well as the wild places that remain on our National Forests.

Upon reviewing the maps and discussing them with Forest Service personnel of the GMUG National Forest, it is very apparent that the preferred alternative (Alternative 2) ignores the value of most Colorado Roadless Areas identified on the Uncompahgre Plateau and Naturita Division of the Forest. Under the preferred alternative, only three areas are included in the upper tier category; Unaweep, Horsefly Canyon, and Naturita Canyon. As described in the EIS and supporting documents, all three of these areas contain extremely valuable elk summer range, calving areas, and winter range. Horsefly and Naturita Canyons also provide habitat for the threatened Mexican spotted owl. Native Colorado River cutthroat trout also occur in Red Canyon and Clear Creek which are tributaries to Horsefly Creek. The Uncompahgre Plateau is predominantly a roaded landscape and these roadless areas provide important areas for backcountry hunting, fishing, and primitive recreation that are not impacted by motorized trails and OHV's.

All three of these areas should remain in the preferred alternative, and the boundaries of the Unaweep roadless area expanded to include all of the area identified on the maps as Colorado Roadless Areas.

In addition, several other roadless areas on the Uncompahgre Plateau need to be included in the upper tier category to preserve their roadless values for fish and wildlife, and for us and future generations. Again, each roadless area needs to include all of the area within the boundaries of the lands mapped as Colorado Roadless Areas. Based upon my local knowledge of the lands identified, I request the following areas be added to the upper tier category:

- Calamity Basin – 12,500 acres
- Dominguez – 12,500 acres
- Johnson Basin – 11,900 acres
- Kelso Mesa – 35,500 acres
- Long Canyon – 17,200 acres
- Windy Point – 12,800 acres

The fish and wildlife values of these areas are extremely important to maintain populations of native and sports fisheries, big game animals such as desert bighorn sheep, elk, mule deer, black bear and mountain lion, as well as federally listed or Forest Service sensitive and Management Indicator Species that depend upon these large, functioning ecosystems. They also provide the backcountry and solitude necessary for a high quality fishing, hunting, and primitive recreation experience that cannot be replaced once these areas are gone.

Similarly, the preferred alternative includes portions of several Colorado Roadless Areas in the upper tier category identified on the Mountain Division (aka San Juan Mountains) of the Uncompahgre Forest but excludes other significant Colorado Roadless Areas from the preferred alternative. The Forest Service should significantly increase the acreage of upper tier lands in the preferred alternative to include lands that are vital for fish and wildlife habitat and backcountry hunting, fishing and primitive recreation opportunities. All of the Alternative 2 lands included in the upper tier category should remain and be expanded to include the entire area mapped as Colorado Roadless Areas. Specifically the following areas within the Mountain Division should remain within the upper tier category:

- Failes Creek/Soldier Creek – 8,900 acres
- Hope Lake - 8,200 acres
- Last Dollar/Sheep Creek – 6,400 acres
- Little Cimarron – 4,200 acres
- Matterhorn – 3,600 acres
- Turret Ridge – 5,500 acres
- Whitehouse Mountain – 14,400 acres
- Wilson – 2,600 acres

In addition, two other roadless areas on the Mountain Division of the Forest need to be included in the upper tier category. Both of these roadless areas need to include all of the area within the boundaries of the lands mapped as Colorado Roadless Areas. Based upon my local knowledge of the lands identified, I request the following areas be added to the upper tier category:

Baldy – 2,300 acres
Cimarron Ridge – 12,300 acres

Collectively, this portion of the Uncompahgre Forest from the Lone Cone to Lake City provides high quality aspen and spruce-fir forest habitats, meadows, and alpine tundra as well as numerous perennial streams. These habitats provide the core recovery area for the threatened Canada lynx in this part of the State as well as high quality summer range for elk, mule deer, Rocky Mountain bighorn sheep, and black bear. The numerous perennial streams, lakes and reservoirs provide habitat for our sports and native fish populations. Conservation populations of native Colorado River cutthroat trout are present in the Nate Creek drainage of the Cimarron Ridge RA as well as the Deep Creek drainage of the Last Dollar/Sheep Creek RA.. The Wilderness and roadless areas within this portion of the Forest provide spectacular opportunities for backcountry hunting, fishing, and primitive recreation that are some of the best in Colorado.

Our local communities fully enjoy these resources and our economies rely heavily on the money generated from hunting, fishing, and primitive recreation opportunities in our area. The proposed Colorado Roadless Rule must fully protect the areas I have identified to maintain our populations of native and sports fisheries, big game animals, and federally listed or Forest Service sensitive and Management Indicator Species that depend upon these large, functioning ecosystems. Our roadless lands provide the backcountry and solitude necessary for a high quality fishing, hunting, and primitive recreation experiences that cannot be replaced once these areas are gone.

Sincerely,

Craig Grother
PO Box 156
Norwood, CO. 81423

craiggrother@yahoo.com

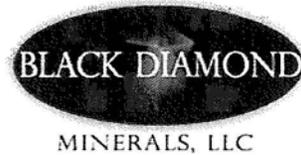
From: Scott Hall [sdhall@badminerals.com]
Sent: Tuesday, July 12, 2011 6:08 PM
To: COcomments
Cc: sdhall@badminerals.com
Subject: Colorado Roadless Rules - Comment - RDEIS
Attachments: RDEIS-July-2011-Comment.pdf

Please find attached my comment on the Colorado Roadless Rule/EIS.

Thank-you

Scott D. Hall

CEO
Black Diamond Minerals, LLC
1600 Stout St. Suite 1710
Denver, CO. 80202
(303) 973-3228 x223 (Off)
www.badminerals.com



July 12, 2011

Colorado Roadless Rule/EIS;
P.O. Box 1919
Sacramento, CA 95812
Federal Register Vol 76. No. 73
Rin 0596-AC74

Re: Colorado Roadless Area Revised Draft Environmental Impact Statement
Linear Construction Zones (LCZs), Alternative 2, impacting offsetting private land

These comments are submitted on behalf of Black Diamond Minerals, LLC ("Black Diamond"). Black Diamond appreciates the opportunity to submit comments on this important issue. Black Diamond Minerals is the owner of a 4,332 acre private ranch that is mostly surrounded by the White River NF, Mamm Peak IRA (non-upper tier), see Exhibit 1.

Black Diamond recommends that Table 2-8, Alternative 2 exceptions, be modified as follows.

From:

"Where Road realignment is needed to prevent irreparable resource damage that arises from design, location, use, or deterioration of a NFS road that cannot be mitigated by road maintenance. Road realignment may occur only if the road is deemed essential for administrative or public access, public health and safety, or other authorized use. Does not apply to upper tier acres."

To:

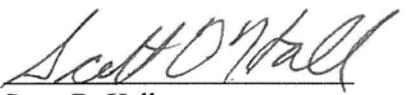
"Where Road realignment is needed to prevent irreparable resource damage that arises from design, location, use, or deterioration of a NFS road that cannot be mitigated by road maintenance. Road realignment may occur only if the road is deemed ~~essential~~ **necessary** for administrative or public access **or access to private land**, public health and safety, or other authorized use. Does not apply to upper tier acres."

Basis of Need:

Black Diamond, like other private land owners adjacent to Roadless Areas, sometimes has problems with accessing private land due to extreme topography and private land boundaries. Historically private land owners have been given relatively short easements by the US Department of Agriculture to allow crossing a short distance into forest service in order to gain access to other portions of the same private land. This type of easement has been granted to the prior land owner of Tepee Park on the east side of Tepee Park in Sec 6, T93W R8S, however, that easement expired.

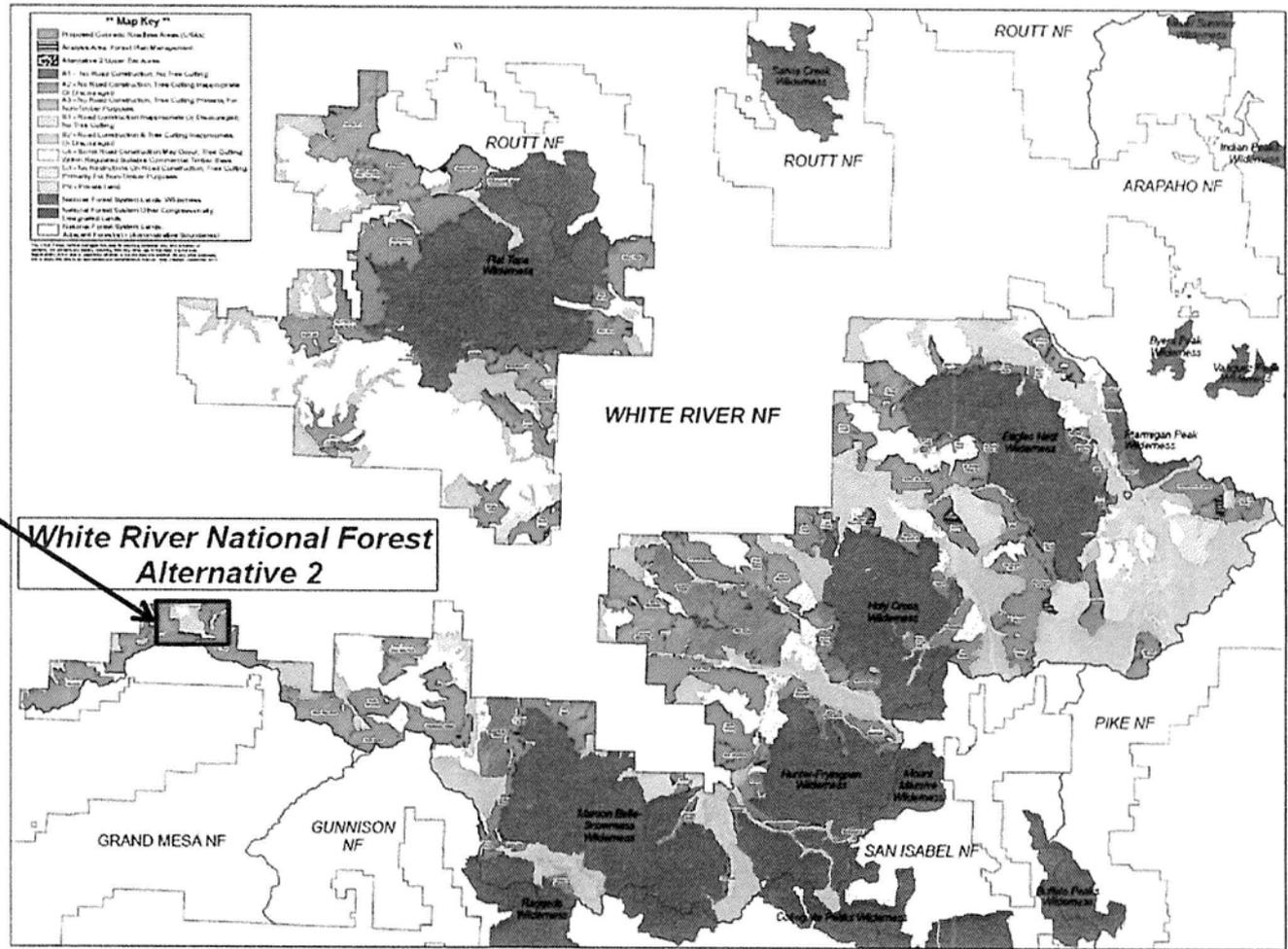
On the west side of Tepee Park there is only one available road to access Tepee Park's far west side, which contains approximately 900 ac. The road is built on a 70% slope that has loose and crumbling rock as shown on Exhibit #2. It's the only possible road staying on Tepee's private land. Other options would put the road on steeper slopes/cliffs, see Exhibit #2. Each spring this road washes out with the melting snow runoff and must be rebuilt. Rebuilding requires cutting deeper into the mountain and pushing the road towards the WRNF\Mamm Peak IRA boundary. It is unsafe. Rebuilding also results in a larger road cut into the mountain, rock debris flows down the mountain below the road, and is expensive to rebuild each summer.

Making the recommended changes above to the DREIS would allow a short road of about 1,000' on much safer and stable terrain for both this property and other private land owners like us. Removing the word "NFS" would include roads that are non-forest service roads like Black Diamond's.



Scott D. Hall
CEO
Black Diamond Minerals, LLC
1600 Stout St, Suite 1710
Denver CO. 80202
Email sdhall@bdminerals.com
303-973-3228 Ext 223

EXHIBIT 1: White River NF Alternative 2 Map

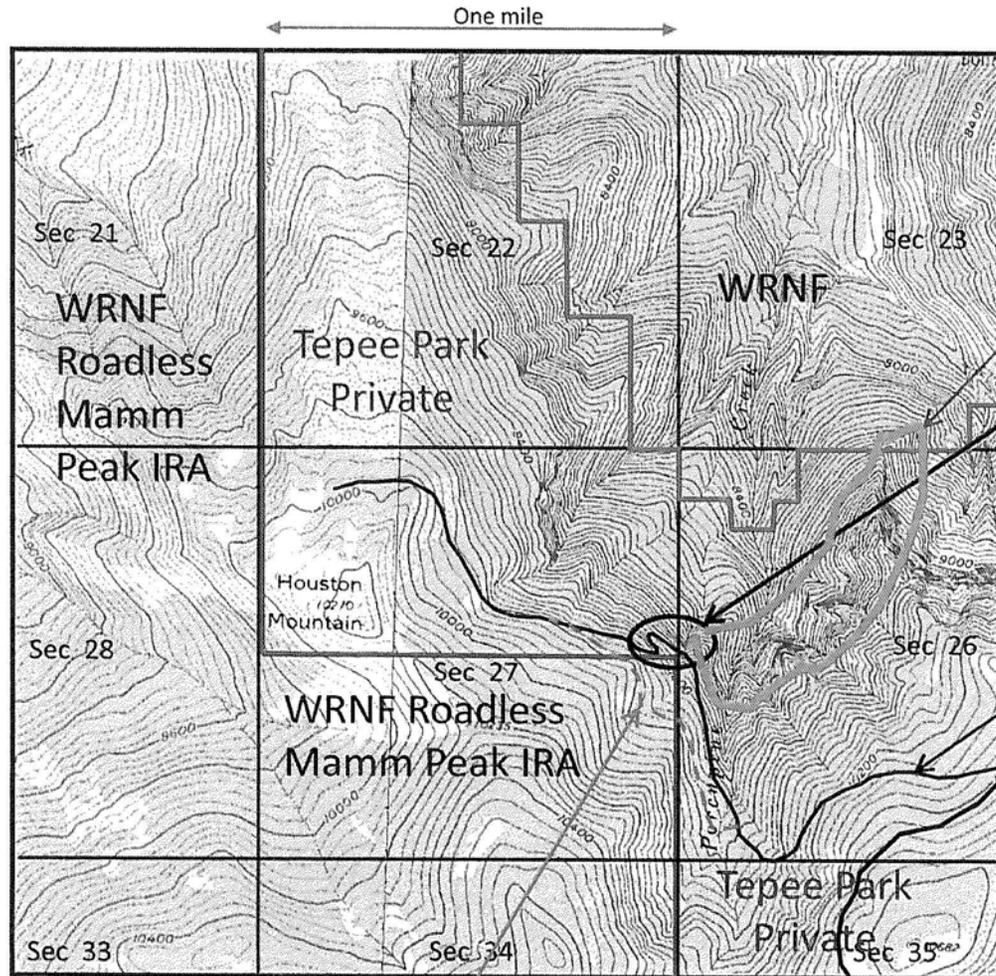


Tepee Park
Private Land
Bordering WRNF

White River National Forest
Alternative 2

002529

EXHIBIT #2: Topo, Houston Mountain Road



Note steep topography, cliffs, roads can not be built

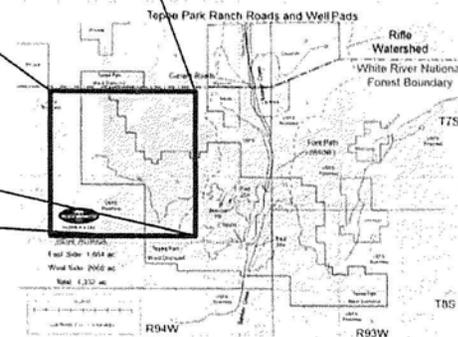
T7S R94W,
Garfield Co,
Colorado

Current Road, is eroding away, large cut and vary dangerous due to topography

Current Road, only access to west side of Tepee Park

Tepee Park, 4,338 acres

Proposed safer, less damaging road, across Roadless Inventory, ~1,000' across WRNF



CORSA9

From: Robyn Weber [r.c.w@q.com]
Sent: Tuesday, July 12, 2011 3:10 PM
To: COcomments
Cc: Robyn Weber
Subject: Colorado Roadless Rule/EIS
Attachments: Colorado Roadless Rule.comments.pdf

Importance: High

Dear Sir or Madame,

Please review our attached comments. (I tried faxing this document today but the fax was busy.)

Thank you for confirming you've received these comments.

Eric and Robyn Weber
720 Birch Street
Denver, CO 80220
r.c.w@q.com

Faxed to 916-456-6724 on July 12, 2011, 3:55PM MDT

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

TOPIC: Special Areas; Roadless Area Conservation:
Applicability to the National Forests in Colorado
Document ID: FS_FRDOC_0001-1051 Document Type: Proposed Rule
Docket ID:
FS_FRDOC_0001
RIN: Not Assigned
Topics: National Forests, Navigation (Air), Recreation Areas, Roadless Area Management
Subject: Keep the 2001 Roadless Rule for Colorado

Dear Sir or Madame:

My husband and I are Colorado tax-paying citizens; we're property-owners and business-owners, and long-time residents of the great state of Colorado. We are writing to express our extreme disappointment in the proposed Colorado Roadless Rule that falls well short of the protection offered under the National Roadless Rule.

Furthermore, we write to express our full support of the National Roadless Rule and want to see the Colorado Rule at least as protective, if not more protective, than the National Roadless Rule.

The Roadless Area Conservation Rule of 2001 was the result of the most extensive public process in the history of federal rulemaking — one that generated approximately 1.6 million comments, more than 90% of those in favor of protecting our Roadless heritage. I strongly supported this Rule. In addition, we are expressly tired of industry using the alleged poor economy as a way to gut environmental laws.

The federal courts have upheld the 2001 Roadless Area Conservation Rule which is now in effect nationally. Colorado's roadless backcountry lands deserve no less protection!

Specifically we urge you to:

- Expand and strengthen "Upper Tier Protections" of the more than 2.8 million areas identified by The Forest Service in one of the many DEIS alternatives. These areas are extremely important wilds lands to people, ecosystems, and animals. They protect critical habitat and provide important wildlife migration corridors that enable sustainable and healthy populations of animals. Also they are vitally important sources of potable water for downstream communities. And, they offer unique and important recreational activities which bring tourism dollars and also help Colorado attract a vibrant workforce. This is essential for Colorado businesses to remain competitive domestically and globally.
- Know that more than 50% of Colorado's roadless areas have the attributes that warrant Upper Tier Protection. We request the Forest Service give the highest level of protection to these lands.

- Support and include the Pike-San Isabel areas nominated for “Upper Tier in Alternative 4” to be included in the proposed Rule.
- All “Upper Tier” lands must have strict “No Surface Occupancy” stipulated to protect the entire roadless area from any current and future oil and gas leasing and development. It must not allow any “linear construction zones” for pipeline, transmission lines, and telecomm facilities.
- Review and support the recommendations developed by the science-based organization, Wild Connections that submitted a 2008 document: *Roadless Areas of South Central Colorado*. Specifically, use this document as input for the roadless rule deliberations. The document includes descriptions and recommendations for the following districts: Pikes Peak, Leadville, Salida, San Carlos, South Park, and South Platte.
- Close all loopholes that would allow oil and gas development, transmission lines, logging, remote residences, and other intrusive forms of development not appropriate for roadless areas.
- Give the highest protections to Colorado roadless acres because: roadless areas protect watersheds and potable water for people, communities, and ecosystems.
- Give the highest protections to Colorado roadless acres because: they protect healthy, viable species of ecosystems and all the plant and animal life found there.
- Give the highest protections to Colorado roadless acres because roadless areas protect healthy, viable species of predators. Predators are required in the environment because they make prey populations (e.g., deer, elk, etc.) stronger by culling out the weak and the old. This helps hunters and sportsmen. Predators control overpopulation and over-grazing of prey animals such as the current problems happening in Rocky Mountain National Park. Overgrazing is causing mono-cultures and reducing the diversity. Using predators to control overpopulation is the lowest cost solution.
- The Roadless Area Conservation Rule of 2001 was the result of the most extensive public process in the history of federal rulemaking — one that generated approximately 1.6 million comments, more than 90% of those in favor of protecting our Roadless heritage. I strongly supported this Rule.
- The federal courts have upheld the 2001 Roadless Area Conservation Rule which is now in effect nationally. Colorado’s roadless backcountry lands deserve no less protection!
- The 2001 Roadless Rule is the national status quo. It maintains current access for hunting, camping, fishing, hiking. Please do not jeopardize our valued recreation opportunities.
- The 2001 Roadless Rule is already flexible enough where it needs to be. Changing the 2001 Rule provisions threatens to weaken and thus void the intended protection of these critical lands.
- In 2006, the Colorado Division of Wildlife fully supported protection of Colorado’s roadless backcountry under the 2001 Roadless Rule to protect critical habitat for big game and other wildlife.
- Road construction should not be allowed in roadless areas, except for emergencies. The 2001 rule provides an adequate exception for emergency access to protect life and public safety.

- The 2001 rule already allows adequate flexibility for fuel treatment projects to protect life and property. Any broader authority places these valuable lands at risk for inappropriate logging projects.
- Roadless backcountry lands provide vital migration corridors, key habitat such as birthing areas, and other ecosystem benefits such as clean water for Coloradoans.
- Coloradoans need the 2001 Rule to maintain this quality of life.

In sum, roadless areas protect the land for people, economies, and ecosystems.

Our Colorado quality of life depends upon them for clean potable water for people. Agriculture depends upon the land for production. Cities depend upon the land for tourism, which accounts for billions of dollars of state revenue, including the ski industry. Animals depend upon them to sustain healthy and viable populations. The balance between predator and prey is vital to our hunting, agriculture, and ranching industries by keeping meso-predators and prey populations in check. Roadless areas allow for nature forces such as fire to take place which also maintain healthy ecosystems and reduce threats such as the pine beetle.

Thank you and we strongly urge you to strengthen, not weaken, protection of Colorado's roadless areas.



Eric Weber
720 Birch Street Denver, CO 80220



Robyn Weber
720 Birch Street Denver, CO 80220

From: William Stumpf [william.stumpf@gmail.com]
Sent: Tuesday, July 12, 2011 3:30 PM
To: COcomments
Subject: CO Roadless Rule

To Whom It May Concern at the USDA and Forest Service,

I stongly and sincerely urge you to protect roadless areas in CO where I very often hike, backpack, and fish. These areas are so very vital and important both for the enjoyment of the outdoors and to protect critical waters that support and safeguard fish and wildlife.

Please adopt the conservation alternative (Alt. 4) that would protect 2.6 million acres in the upper tier category. Just this past weekend I spent days hiking and fishing in the Hunter Fryingpan Wilderness area and surrounding forest lands. It was majestically beautiful, amazingly silent of human made noise (except for jet aircraft passing overhead), and felt sublimely pristine and wild. Finding pockets of calm water amid the incredible runoff, I caught and released amazingly colored and healthy cutthroat trout. The size of these fish, esp. after such a long winter, surprised me. I could only attribute it to the protected nature of the land that allowed the flora and fauna to thrive undisturbed. Clearly most of the fish were able to eat well, and the insect life (mayflies and caddisflies) was abundant.

In addition, there are many water diversions in the mountains that provide the front range with good sources of clean water for our families and children. Erosion and pollution caused by overuse, construction, or poor management would not only hurt the quality of water for the wildlife but could also impact the quality of the water and watershed for me and my children. At the very least, increased sediment and pollutants would cause municipalities to have to increase the amount of cleaning, filtering and purification of the water for human consumption.

I ask and urge you to protect roadless areas with No Surface Occupancy (NSO) stipulations and do not grant any waivers to prevent development from disturbing the surface inside roadless areas. Invasive species, chemical contamination, habitat fragmentation, damage to waterways and the degradation of the visual splendor of this areas are impacts that we cannot afford in the last wild places we have.

Also, please keep Linear Construction Zones (LCZs) out of upper tier areas. These are the best lands left in Colorado. They are too valuable to be developed of any kind. These should be reserved for the general public in their natural and pristine state and not developed for the use of a few special interests or beneficiaries. They must be off limits to any development. Where else will we have left once they are developed. You cannot turn back the clock or revert these lands to their natural state. Once the damage is done, it is done permanently.

Please protect these lands not only for the fish and wildlife, the cool clean water sources, and hunting and fishing heritage, but do it for our children, their children, and their children. Roadless backcountry will disappear forever otherwise, and future generations won't know the pleasure of pristine nature. My family enjoyed hiking in the roadless mountain areas in Routt County near Steamboat Springs over the July 4th weekend. It was the highlight of their weekend. They enjoyed nature, the solitude, the fresh air, the natural scenery, and the lack of man-made noises and intrusions into the habitat.

I ask you to do this, to preserve the roadless areas for me and my children so that they may enjoy the wonderful experiences that my father and uncle showed me when I was younger and was first able to hike, backpack and fish in the natural wonders of our undeveloped backcountry. Leave vehicles at the trailhead and leave what natural, untouched areas that remain in the current state. I want to experience with my children and grandchildren what they experienced with me.

Thank you for developing this proposal over the past five years, but PLEASE PROTECT OUR ROADLESS AREAS!

Regards,
William Stumpf and family
1180 South Saint Paul St.
Denver, CO 80210

COR531

From: ccwfoundation [chris@clearcreekwater.org]
Sent: Wednesday, July 13, 2011 9:06 AM
To: COcomments
Cc: CCWF; Chris Crouse
Subject: COMMENT FOR THE RECORD-CO Roadless Rule-CCWF
Attachments: CO Roadless Rule COMMENT FOR THE RECORD-Clear Creek Watershed Foundation_7-13-2011.pdf

Importance: High

Attached please find CCWF's COMMENT FOR THE RECORD for the Colorado Roadless Rule/EIS. To ensure receipt of our comments to the Forest Service, we have also submitted our comment via fax to: 916-456-6724.

If there are any difficulties with this transmittal, please notify us as soon as possible via email or phone.

Thank you for your assistance.

Chris

Christine Crouse, Outreach & Administrative Coordinator

CLEAR CREEK WATERSHED FOUNDATION

info@clearcreekwater.org • www.clearcreekwater.org • 303-567-2699

2060 Miner St. • P.O. Box 1963 • Idaho Springs, CO 80452

~ADVANCING WATERSHED SUSTAINABILITY~



P.O. Box 1963 • Idaho Springs, CO 80452 • 303.567.2699 • info@clearcreekwater.org • www.clearcreekwater.org

Colorado Roadless Rule/EIS

P. O. Box 1919

Sacramento, CA 95812

Email: COComments@fsroadless.org

Fax: 916-456-6724

July 13, 2011

COMMENT FOR THE RECORD

The Clear Creek Watershed Foundation (CCWF) respectfully submits the following comments for the record on the proposed Colorado Roadless Rule as outlined in preferred Alternative 2 in the Federal Register notice (76 FR 21272) and the Rulemaking for Colorado Roadless Rule Revised Draft Environmental Impact Statement (RDEIS).

CCWF was incorporated in 1997 as a non-profit organization dedicated to improving the ecological, aesthetic, recreational, and economic conditions in the Clear Creek Watershed through comprehensive efforts with watershed stakeholders. Our mission is to promote sustainable natural resource management throughout the Clear Creek Watershed.

CCWF has read and understands the need statement as expressed in the proposed Colorado Roadless Rule RDEIS. We challenge the benefit of this unrestricted need as it is grossly overstated compared to other national priorities including metal, mineral and energy extraction, interstate commerce, and electrical transmission planning. The land being taken exceeds the need.

CCWF believes that the proposed roadless plan has not adequately considered the impacts of roadless designation on watershed management or on local communities. The plan must be revised to consider the future planning of each community and integrate community planning into the rule so as not to jeopardize community forecasts and safety. A balanced version of watershed sustainability, energy development, mining and rare earth extraction, recreation opportunities, and property rights without litigation must be achieved.

COMMENT #1: WATERSHED MANAGEMENT

A responsible Colorado Roadless Rule must incorporate a multi-use plan allowing for maintenance and restoration for a healthy forest. A healthy watershed demands active forest maintenance including thinning, erosion control, and revegetation actions. The proposed Colorado Roadless Rule restricts forest management options, in turn making impossible adequate access which is necessary to avoid catastrophes such as the Hayman Fire and the costs associated with mitigation which, in most cases, is beyond the threshold of a local community's means. Of particular concern is the designation of "upper tier" CRAs that would "preclude forest health treatments involving tree-cutting and may thereby lead to larger areas of dead trees, and potentially larger and more damaging wildfires." (RDEIS page 95.) This restriction will result in a greater risk of severe extreme events.

We strongly urge that upper tier designations be removed from the Colorado Roadless Rule.

In addition, watershed protection ordinances are already in place for municipalities authorized under Colorado law. Towns are empowered to protect their water source. This is a particular issue for Empire, CO and the Mad Creek Watershed where the Colorado Roadless Rule is in conflict with the Healthy Forest Restoration Act (HFRA)

passed in 2003. In the HFRA, Congress directed communities in the Wildland/Urban Interface (WUI) to prepare Community Wildfire Protection Plans (CWPP). Once completed, a CWPP provides statutory incentives for the Forest Service and the Bureau of Land Management to give consideration to the priorities of the local communities as they develop and implement forest management and hazardous fuel reduction projects.

Empire's Community Wildfire Protection Implementation Plan (CWPIP) is under the umbrella guidance of the Clear Creek County CWPP. The Empire CWPIP provides wildfire hazard and risk assessments and mitigation recommendations for the Empire communities and associated watershed situated between 8,300 and 11,300 feet elevation in Clear Creek County. The Colorado Roadless Rule did not consider the Healthy Forest Restoration Act or Community Wildfire Protection Plans.

The proposed rule should be revised to recognize these ordinances and adjust the boundaries accordingly to reflect the management jurisdictions of the local communities.

COMMENT #2: RENEWABLE ENERGY DEVELOPMENT

The Energy Policy Act of 2005 recognized the role of the Forest Service in helping to reduce U.S. reliance on foreign sources of energy. Development of wind, solar, and other alternative energy sources was deemed an appropriate use of National Forest System lands. Exceptions have been made in the Colorado Roadless Rule for oil, coal, and gas, but not for renewable energy. The Colorado Roadless Rule provides that roads may not be constructed on any Colorado Roadless Areas unless the proposed road falls within an "exception." That proposed roadless areas were eliminated from consideration in the assessment of the potential for renewable energy development on National Forest System lands, performed by NREL in 2008 at the request of the Forest Service, and the RDEIS detailed study eliminated renewable energy from analysis, is in direct conflict with Executive Order 13212, which seeks to expedite energy production measures. The proposed Colorado Roadless Rule would in effect lock out renewable energy development as a future use in Colorado Roadless Areas. This is a fatal flaw.

Clear Creek County is one small mountain community that has taken the initiative to create a map of their county with overlays of the proposed roadless areas as they relate to identified renewable energy zones. This map includes the location of the existing transmission corridors housed within the county consisting of two 230kv lines and a 115kv line as they correlate to the renewable energy zones. The overlays reveal that approximately 15% of the proposed roadless areas in Clear Creek County could potentially be developed for renewable energy (see **Appendix - Exhibit #1**).

Renewable energy development plays a significant role in Clear Creek County's future planning. The county has distinct location advantages for this type of development including:

- Diversity of the mountain wind capture location, as compared to the existing wind sites in the eastern area of the State, has an advantage pertaining to transmission system reliability.
- Proximity to one of the nation's largest pumped hydro storage facilities. Line losses associated with transmitting renewable energy to the pumped hydro storage site would be considerably less for power generated within Clear Creek County than for other more distant wind capture locations.
- Close association with the Denver transmission loop.

Any project proposal in Clear Creek County will require Forest Service permitting in that Clear Creek County is approximately 68% Forest Service land. Presently, without Forest Service renewable energy guidelines in place, the Forest Service permitting process is perceived to have too high of a risk for failure. With no renewable energy directives coming from the Forest Service, the probability for the Forest Service to host renewable energy projects on the lands they manage is unlikely. To add roadless designations nearby and within identified renewable energy zones will prevent projects entirely. It is doubtful if other counties throughout the state have had an opportunity to conduct a similar mapping exercise to see how the proposed roadless areas might impact their

future planning. It would be beneficial for those communities with proposed roadless areas within their jurisdiction to be afforded the time to evaluate how this rule may jeopardize their future.

CCWF strongly recommends that proposed Colorado Roadless Areas be analyzed for renewable energy potential and those areas identified be either:

- Removed from the proposed Roadless Areas.
- or
- Given exceptions such as were granted to coal, oil, and gas. On Page #4, in the RDEIS Summary, add an additional point of state-specific situations and concerns: "Accommodating Renewable Energy development in identified renewable energy resource zones."

COMMENT 3: MINING RIGHTS

The RDEIS states that the 1872 mining laws supersede the proposed Colorado Roadless Rule, yet it still does not acknowledge existing mining and other property rights within historic mining communities that are interspersed with public lands and are supported by historic road infrastructures. Roads do exist in these areas; therefore the areas do not meet the criteria for roadless designation. Historic mining communities have construction cost advantages for development of both mining and renewable energy because road systems are already in place via historic road networks which predate the U. S. Forest Service.

As an example, in addition to Henderson Mine's molybdenum, there are approximately 2,000 mining claims in Clear Creek County which represent an additional wealth of mineral resources including metals such as gold, silver, copper, and rare earth minerals. Roadless designation could make access to these claims unduly difficult to obtain, thereby diminishing the viable economics of these patented properties. Mining Engineer David Mosch prepared and provided to Clear Creek County maps of potential natural resource extraction areas (see **Appendix – Exhibits # 2, 3, 4, and 5**). As our nation reevaluates its national defense stockpile of metals and rare earth minerals, no consideration of these future needs were taken into account in the RDEIS.

The proposed plan must be revised to include language that would prevent the rule from imposing limits or making it unduly financially burdensome on activities related to the exploration and development of natural resources, to include hard rock mining and renewable energy.

COMMENT 4: RECREATION

A significant amount of recreation occurs in our National Forests. It is crucial that these areas be actively managed to provide for forest health, access, and diverse recreation opportunities. Eliminating roads within these areas will impact the ability to manage them and impact the important recreation economy of local communities.

As stated in the October 2, 2009 Colorado Mining Association Roadless Rule Comments to the Colorado Department of Natural Resources, roadless areas cannot be lawfully treated as wilderness areas. "Wilderness is defined, in part, as 'an area where the earth and its community of life are untrammeled by man, where man is himself a visitor who does not remain.' 16 U.S.C. 1131(c)." Only Congress may designate wilderness areas, and for Colorado to propose to do so via "upper tier" designation, is in direct conflict with the U.S. Constitution and the federal Wilderness Act.

We strongly suggest upper tier designations be removed from the Colorado Roadless Rule.

COMMENT 5: PROPERTY RIGHTS

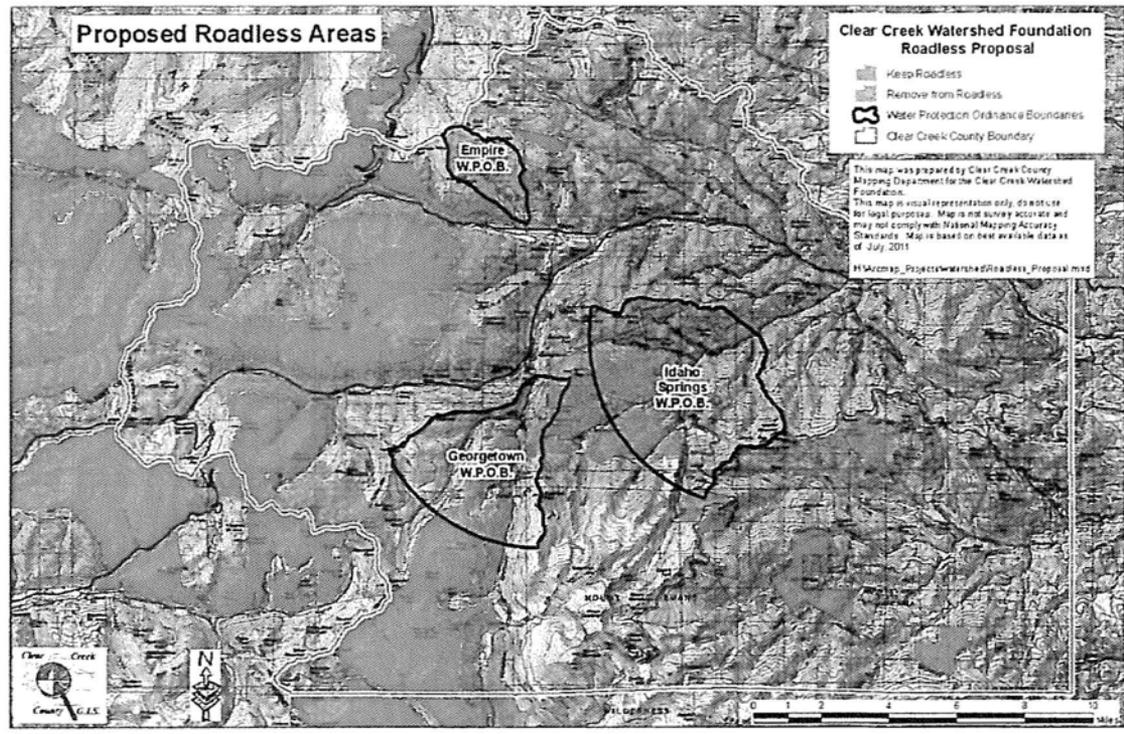
CCWF's review of the proposed Colorado Roadless Rule in fact show that the upper tier areas are not roadless, that they contain numerous patented properties predating the U. S. Forest Service, that these property owners were not contacted by the U.S. Forest Service or the State of Colorado in the rulemaking process as required by Colorado laws, that the rule as depicted in Alternative 2 would constitute a significant taking, that these properties are properly zoned under Colorado law, that these owners have and continue to pay property taxes in accordance

with their lawful uses, and that these owners have access rights to their properties under Federal and Colorado law. The proposed Colorado Roadless Rule works to impede all of the above rights and safeguards.

We strongly urge that specific access corridors be designated into these properties within the Colorado Roadless Rule.

COMMENT 6: BOTTOM LINE

Provided here is a revised map of the roadless designation areas in Clear Creek County that, without litigation, would achieve a balanced version of watershed sustainability, energy development, mining and rare earth extraction, recreation opportunities, and property rights. The red shaded areas are acceptable areas for roadless designation in Clear Creek County with all upper tier designations removed. The blue shaded areas are RDEIS proposed Colorado Roadless that is in conflict with local community planning, health, safety and welfare considerations.



We strongly urge that the map provided above replace the Clear Creek County proposed Colorado Roadless Rule RDEIS map of the same as it incorporates COMMENTS 1-5 above into a single source of geographic data.

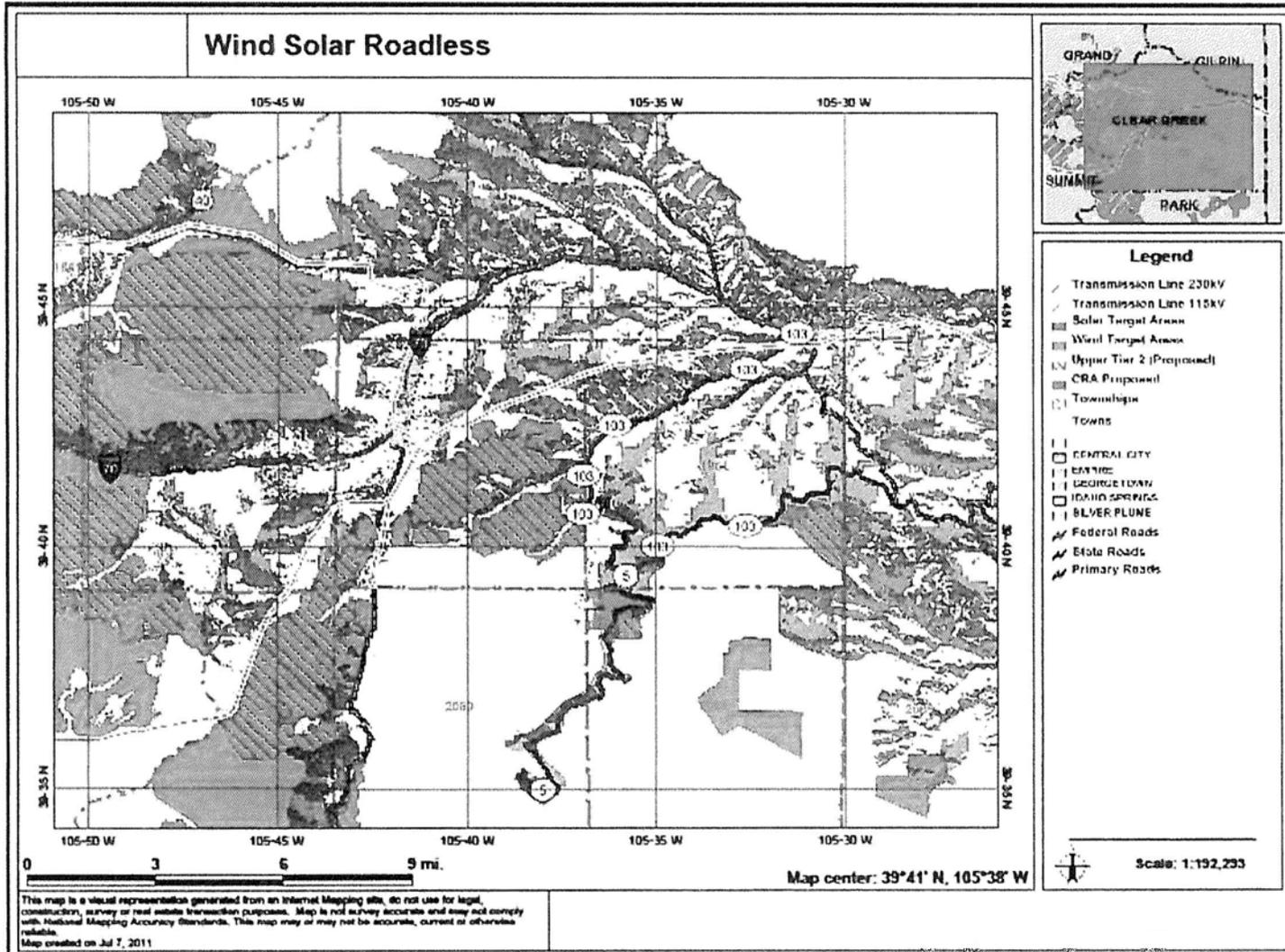
Sincerely,

Edward G. Rapp
 Edward G. Rapp, P. E.
 President, Clear Creek Watershed Foundation

Appendix

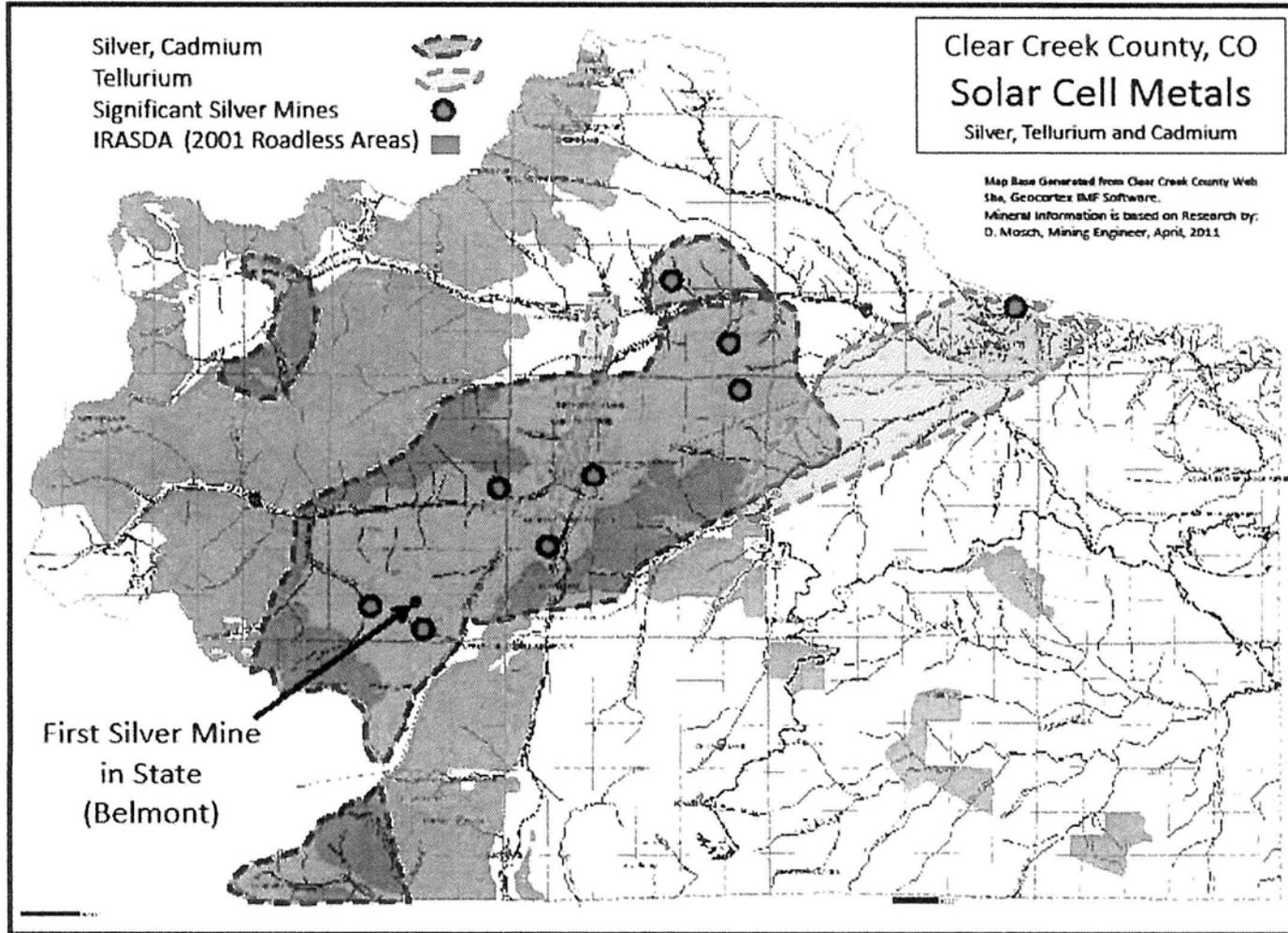
Clear Creek Watershed Foundation
Proposed Colorado Roadless Rule Comments

Exhibit #1



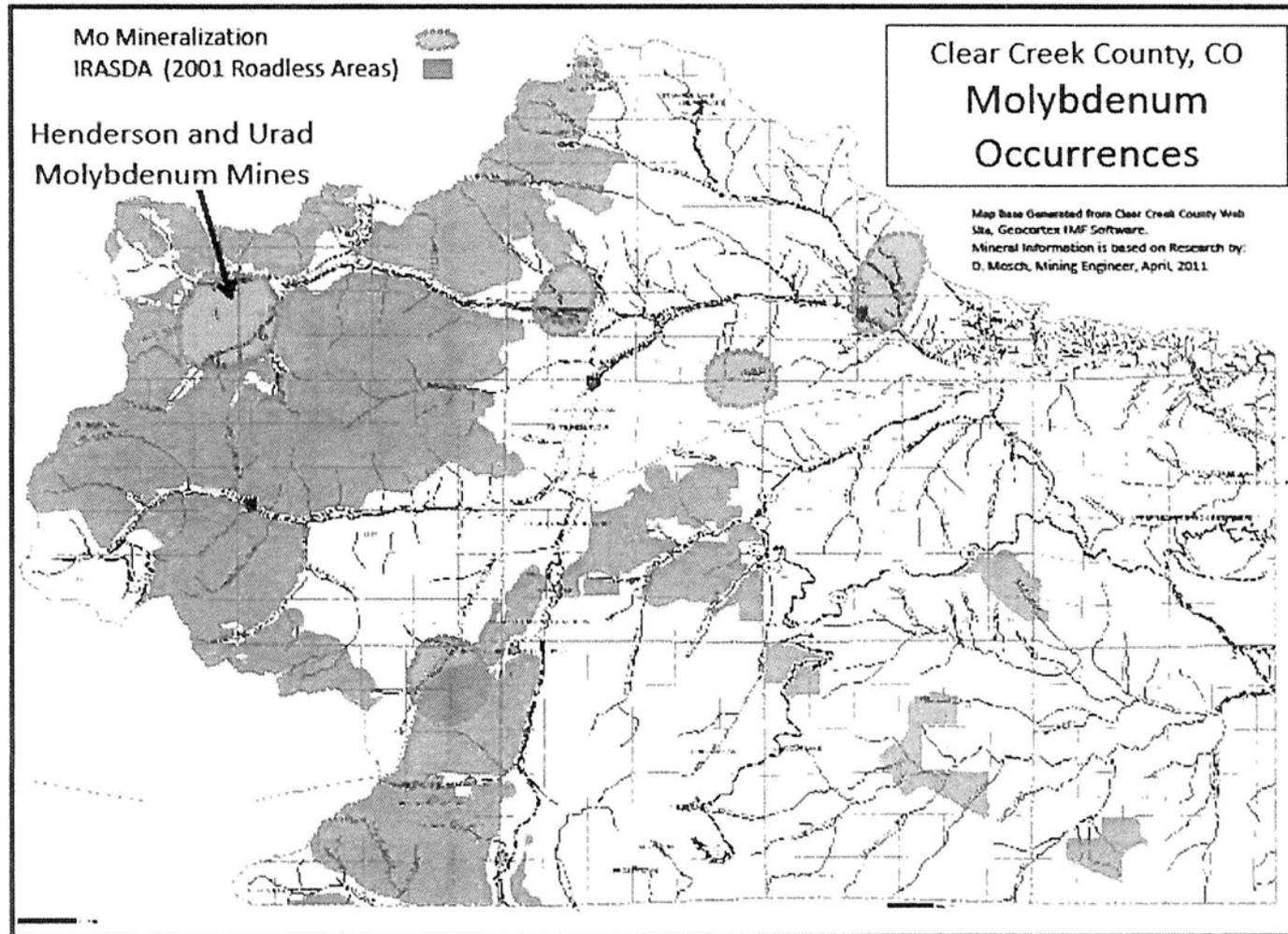
002532

Exhibit #2



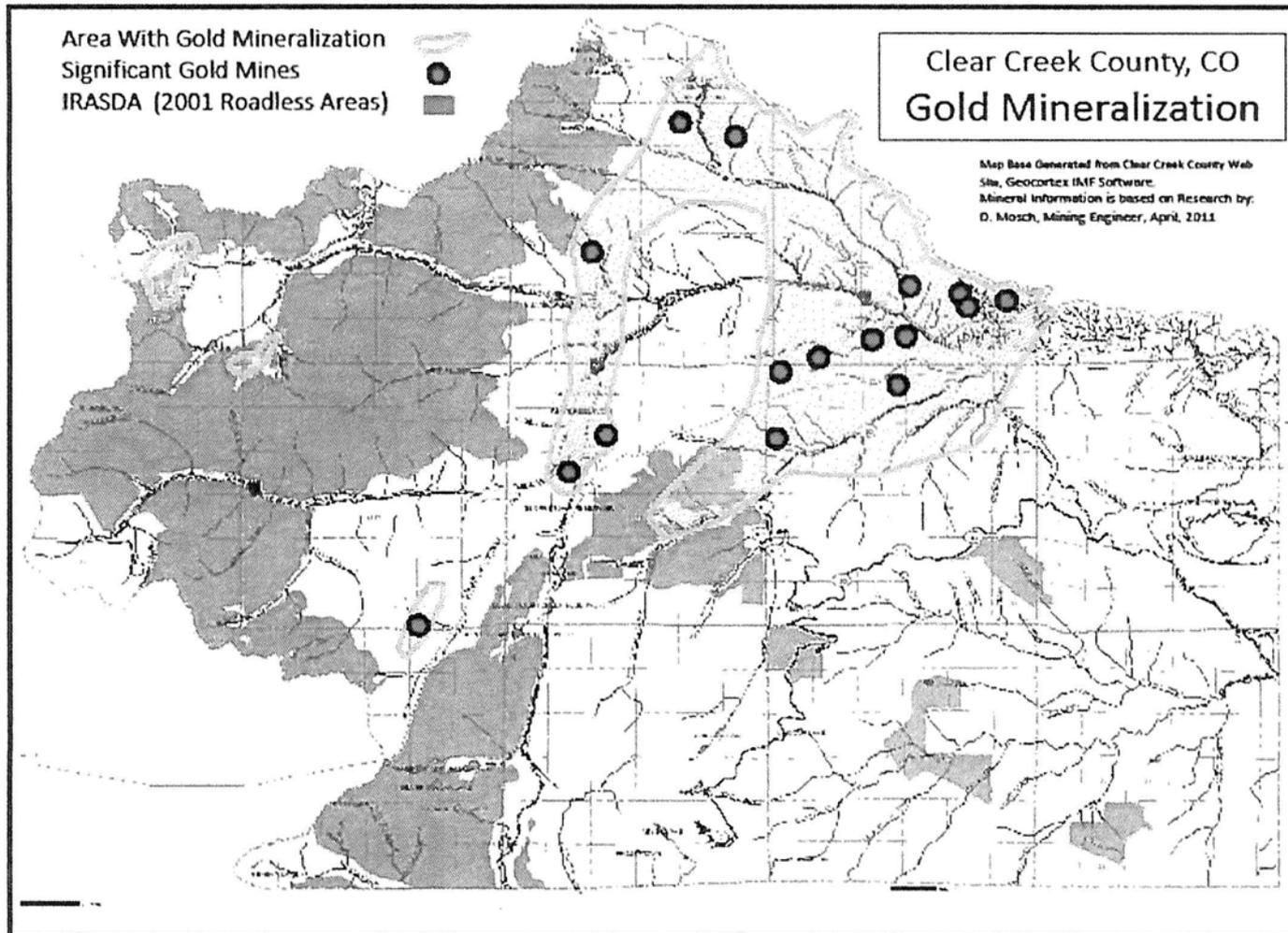
CORS33

Exhibit #3



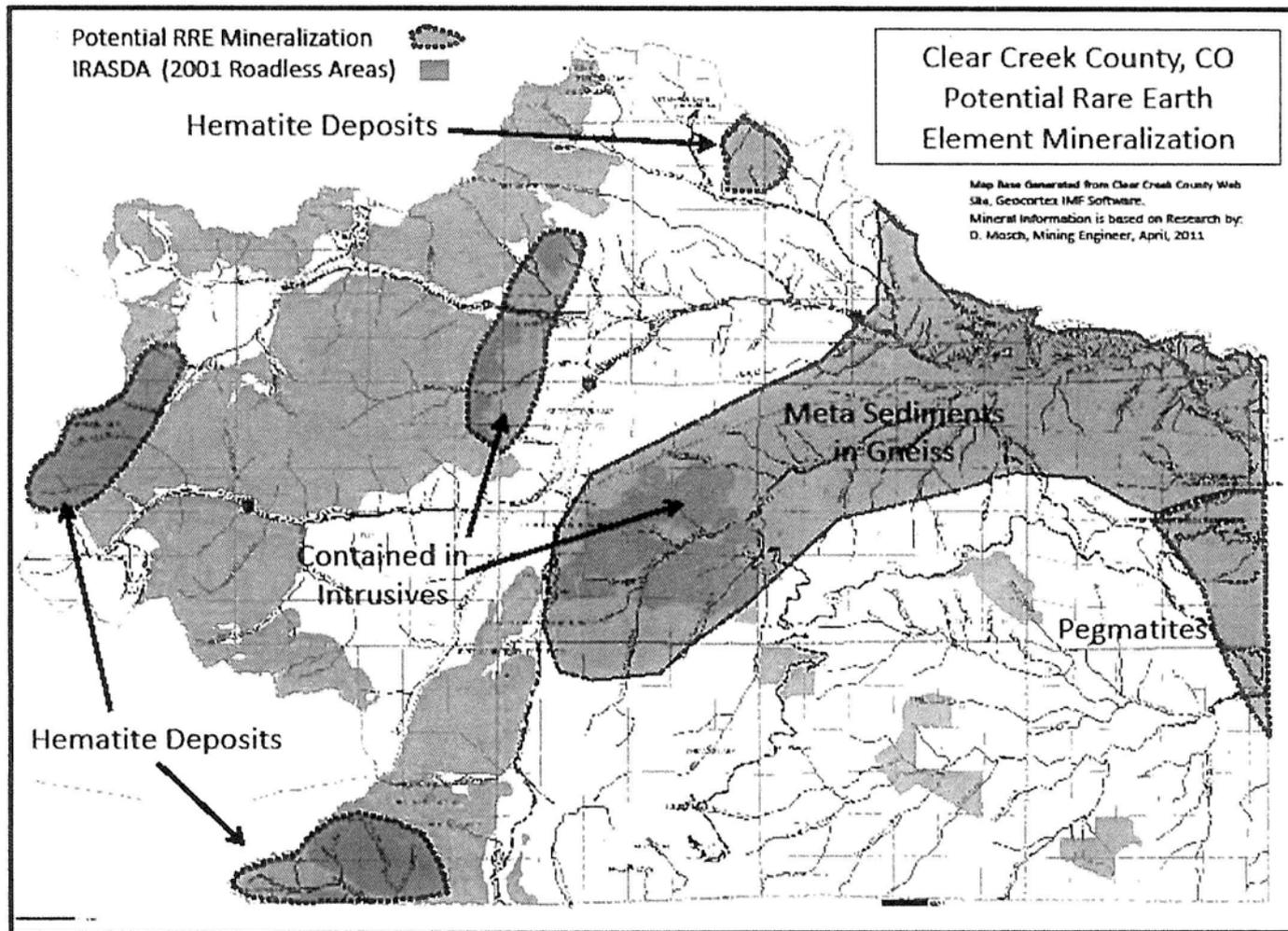
CARSDA

Exhibit #4



CORSA

Exhibit #5



002532

From: Jim Stephenson [jimphoto@montrose.net]
Sent: Wednesday, July 13, 2011 10:22 AM
To: COcomments
Subject: Colorado roadless rule comments
Attachments: ROCC draft roadless comments.pdf; ATT00001.htm

Attached are comments ont the Colorado Roadless Rule RDEIS being submitted by Ridgway Ouray Community Council

Thanks you!

Jim Stephenson
PO Box 272
Ridgway, CO 81432 970/626-5594
jimphoto@montrose.net

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

via e-mail: [HYPERLINK "mailto:COComments@fsroadless.org" COComments@fsroadless.org](mailto:COComments@fsroadless.org)

July 13, 2011

Dear Forest Service,

The following are the comments of Ridgway-Ouray Community Council (ROCC) on the Special Areas; Roadless Area Conservation; Applicability to the National Forests in Colorado, as described at 76 Fed Reg 21272 et seq., April 15, 2011 ("Preamble"). We also provide comments on the accompanying Revised Draft Environmental Impact Statement ("RDEIS"). ROCC expresses our thanks for the opportunity to provide our comments.

ROCC is a nonprofit organization whose primary mission is to maintain and improve the quality of life in Ouray County through the creation of a healthy, sustainable and well-planned community and the restoration and protection of its natural environment, taking into consideration the needs, interests, and concerns of the community at large. ROCC has almost 300 members in Ouray County.

As in comments on previous incarnations of a Colorado Roadless Rule, we emphasize here the importance of protecting roadless areas. They provide resources of critical and inestimably high value for the United States and our local areas. Without national forest roadless areas, wide-ranging species such as lynx and many others, would not have sufficient quality and quantity of habitat to ensure their continued existence on the landscape. We recognize the impacts of roads on wildlife and plants, demonstrating that roadless areas are needed to ensure sufficient quality and quantity of habitats for wildlife, fish, and plants, especially, along with wilderness areas, to provide refuge for mid to large-sized carnivores. Roadless areas provide good protection for watersheds, which is very important since more than 95% of the roadless areas in Colorado overlap one or more source water assessment areas. Roadless areas offer outstanding opportunities for primitive forms of recreation, such as hiking, backpacking, peak climbing, horseback riding, cross-country skiing, and snowshoeing. Roadless areas are often less crowded than designated wilderness areas.

The Purpose and Need for the Colorado rule recognizes roadless values. Roadless areas are important because they are, among other things, sources of drinking water, important fish and wildlife habitat, semi-primitive or primitive recreation areas, and naturally appearing landscapes. There is a need to provide for the preservation of roadless area characteristics.

The Purpose and Need further recognizes the threats to roadless areas: tree-cutting, sale or removal and road construction/reconstruction have the greatest likelihood of altering and fragmenting landscapes, resulting in immediate, long-term loss of roadless area values and characteristics and there is a need to generally prohibit these activities in roadless areas. Since the 2001 Roadless Rule was promulgated, some have argued that linear construction zones

(LCZs) also need to be restricted.

The Forest Service has produced a RDEIS that offers four alternatives. The Forest Service favored alternative is Alternative 2, which has introduced an interesting new concept described as "upper tier" protection. While there are faults with this concept, we feel that it does have merits toward providing protection for our roadless areas. However, the Alternative #2 falls short of providing the total levels of protection and total acreages that Colorado's forests deserve. The RDEIS', naming of Alternative 2 as the "preferred alternative" should have gone further and named Alternative 4 as the "conservation alternative", as has been done in this process in the past.

We, therefore would like to recognize our preference to Alternative #4; the conservation alternative. Further, even in "upper tier" areas, there are deficiencies in the levels of protection. Alternative 4 recognizes the need for a much larger number of acres for upper tier protection. We find it disturbing that the forest service would actually favor an alternative (2) that proposes to put forth only 13% of Colorado's roadless areas as deserving of a higher level of protection and that there are actually forests in the state that have an even lower percentage or none, of upper tier areas proposed. We would urge a provision to the rule to not only recognize the number of upper tier acres in Alternative 4 as the protected lands in the rule, but to propose a current and constant re-evaluation and re-inventory process to recognize the need for an expansion of the lands that were not proposed even in this Alternative 4. The proposed upper tier lands are identified through a flawed approach, relying on forest plans ranging from nine to 27 years in age.

Protection of a significant amount of our roadless forests—based not on forest plans that were not looking specifically for roadless characteristics, but on the values of these lands—would help safeguard the state's high quality watersheds, benefit Colorado's wildlife, and ensure opportunities for world-class recreation.

For the Colorado rule to live up to the national rule standard, the acreage of roadless areas designated as "upper tier" must be expanded considerably. Upper tier lands should receive even stronger protections than those provided by the national roadless rule (Alternative 1). This designation would balance some of the narrowly defined exceptions for backcountry development permitted in the draft Colorado rule.

Any alternative providing the maximum level, of protection should include, though not necessarily be limited to, the following protective provisions and at least be as strong as the 2001 rule:

THE PROPOSED RULE PROVIDES OVERLY BROAD EXCEPTIONS TO THE PROHIBITION ON LOGGING.

THE PROPOSED RULE WOULD ALLOW TOO MUCH ROAD CONSTRUCTION IN ROADLESS AREAS.

- Recognize that roads damage and destroy roadless area characteristics.
- Do not allow roads for water projects
- Do not allow roads for mineral leases let since the 2001 rule became effective
- Reduce road construction allowed for oil and gas leases
- Prohibit roads for coal mining
- Define road decommissions to mean obliteration and require it for all roads and linear construction zones

THE RDEIS MUST ADDRESS "GAP" LEASES AND PROTECT THE ROADLESS AREAS SO LEASED.

Invalidate or add appropriate stipulation on Gap leases
 There is no question that gap leases were let in conflict with the 2001 Rule
 Avoid grandfathering invalid oil and gas leases
 The agency has authority to cancel or further stipulate existing leases

FULLY PROTECT ALL ROADLESS AREAS FROM THE POTENTIAL IMPACTS OF OIL-GAS ACTIVITIES.

Withdraw roadless areas from availability for leasing
 Areas not withdrawn must include NSO stipulations
 Re-evaluate potential air-quality impacts of oil and gas development in roadless areas
 Constrain oil and gas development protect class 1 airspeeds

RESTRICT THE ALLOWANCE FOR LINEAR CONSTRUCTION ZONES TO VALID EXISTING RIGHTS.

Too many exceptions renders prohibition meaningless
 LCZ allowances should be limited to existing rights
 Oil and gas pipeline LCZs must be limited to existing rights
 Rule must clarify criteria used to determine placement of LCZs

PROTECT THREATENED AND ENDANGERED WILDLIFE AND PLANTS

LIMIT THE IMPACTS OF COAL MINING IN ROADLESS AREAS.

Maintain integrity of Current Creek Roadless Area
 Require capturing or flaring of methane produced during coal mining
 EIS must estimate green house gasses emitted from coal mining in roadless areas
 EIS must disclose the impacts of methane drainage vents

POTENTIAL SKI AREAS MUST NOT BE REMOVED FROM THE ROADLESS INVENTORY

PROHIBIT ROADBUILDING FOR REMOVAL OF "MINERAL MATERIALS" IN ROADLESS AREAS.

MISCELLANEOUS ISSUES:

Any roadless area adjacent to existing or proposed Wilderness must be seriously considered as upper tier.

On all roadless forests, priority must be given to the area's roadless qualities and characteristics, upper tier or not.

New roads of any type should not be allowed to access or develop future water facilities, nor should the idea of '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.

Even in the case when permitting allowable activities, protection of the area's roadless qualities and characteristics need to be the agency's top consideration. Broad agency discretion to approve logging projects in the backcountry, new exemptions for roadbuilding to access yet undeveloped water facilities, and expanding authorities to allow 'linear construction zones' should all be reworked to ensure that the primary purpose and overriding consideration is protection of these natural lands.

A final rule must ensure that an area's overall roadless qualities and characteristics be enhanced and maintained and must tighten the overly broad discretion that would allow logging far into the backcountry.

In summary; Keeping these national forests areas intact is very important as all uses of our forests increase. Providing strong, top tier protection to as many of our roadless forests as practicable will help make a Colorado rule at least as protective as the 2001 Rule, particularly given that other roadless areas are still subject to exceptions for coal mining, ski areas, roadbuilding and tree cutting.

We want to stress also that the 'upper tier' protections need strengthened to reach a level that is more protective than the 2001 Roadless Rule. This includes imposing strict No Surface Occupancy stipulations for future oil and gas leases, and tightening a loophole that could allow new pipelines, utility lines and telecommunications facilities into these areas.

We are also urging some fixes to the proposed rule overall—limiting discretion that could allow logging far into the backcountry, removing allowances for new roads to develop and access future dams, reservoirs and water facilities, and ensuring that protection of all these lands roadless characteristics remain the top priority in any rule.

Loopholes in those protections put even these few roadless areas at risk from oil and gas development, pipelines, and transmission lines. And the risk is even greater for roadless areas that would not be managed under an upper tier, where logging would be allowed at least a mile and a half into roadless areas.

We have addressed some areas in our immediate county and in the GMUG National Forest that are of special interest to our members and a broader community. We request that you will give this list special scrutiny and use them as a starting point to consider these and other similar outstanding areas for upper tier protection. This list of areas follows as an appendix to these comments.

Thank you for this opportunity to provide comments. Our remaining wildlands are simply too great a resource to squander—providing clean water, abundant wildlife, and unsurpassed recreation on a nationally recognized public landscape.

We support the protections embodied in the National 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 and give priority to maintaining and enhancing roadless characteristics in all the state's Inventoried Roadless Areas. Our roadless forests deserve the strongest protections. This would make the Obama administration's stated commitment a tangible conservation legacy and honor the proud tradition of the U.S. Forest Service.

Denise Gendreau, President
Ridgway Ouray Community Council

Jim Stephenson, Chair and Contact
Public Lands Committee, ROCC
PO Box 1077
Ridgway, CO 81432

Appendix

Cannibal Plateau*

This 14,500-acre area contains the highest continuous alpine tundra in the lower 48 states (and is contiguous with Powderhorn and La Garita Wildernesses). The sweeping views from the top of the plateau into the high peaks of the La Garitas to the south are magnificent. In addition, the National Landmark Slumgullion Earthflow lies to the southeast, a world-class geologic formation. The lower conifer-forested slopes below the high tundra have a high percentage of late successional habitats. This area is important as lynx connection habitat, and serves as a gathering and dispersion point for reintroduced moose.

Cochetopa Hills*

The largest remaining roadless area on the Gunnison National Forest is the 98,563-acre Cochetopa Hills. This area is clad in rolling mixed-conifer and spruce-fir forests, and is an important regional wildlife corridor between the Rio Grande/San Juan Basin to the south, and the Gunnison Basin to the north. One of the lowest points on the Continental Divide in Colorado, Cochetopa Hills is a natural crossing point of many wildlife species in and out of the Gunnison Basin, and forms an important ecological link from the La Garitas to the west, and towards Fossil Ridge to the north. The area has been especially noted as a well-used trans-basin lynx crossing point in the USFS Region Two 2004 Lynx assessment.

Clear Fork, Turner Creek and Hightower*

The Clear Creek proposed wilderness straddles the Gunnison Delta County border near the northern boundary of the GMUG, and includes many feeder streams that provide vital habitat to genetically pure strains of Colorado River Cutthroat Trout. The area is also important for elk winter range, fawning habitat for mule deer, and winter forage for Canada lynx. Northern goshawks also occur in the area's expansive mature aspen forest. Turner Creek, being adjacent lands, provide an extension for wildlife connectivity, probably into the Hightower area. Clear Fork Muddy Creek, Second Creek, North Twin Creek, and South Twin Creek are designated native cutthroat waters in the Clear Fork Roadless Area. These streams contain conservation populations of Colorado River cutthroat trout, *Oncorhynchus clarkii pleuriticus*, a state species of special concern. Colorado River cutthroat trout now occupy only 10% of historic range in Colorado and conservation populations are remnant populations of the best genetic purity and deserve the highest level of protection. Potential impacts of new roads and increased vehicle use on cutthroat habitats include degradation of riparian habitats, increased sedimentation, and barriers to fish movement from road culverts.

East Elk*

An addition to the West Elk Wilderness. Most of its 6,000 acres are lower elevation Douglas fir, aspen, shrub, and some mixed conifer and spruce-fir in the higher reaches. These lower elevation habitats are underrepresented among wilderness lands on the GMUG, and provide a connection between the southern-most reaches of the West Elk Wilderness and the Curecanti National Recreation Area boundary. Beaver and West Elk Creek have native cutthroat trout populations in these drainages.

Electric Mountain and Pilot Knob*

These roadless areas are dominated by aspen, with conifer at higher elevations. They are important for lynx habitat, and is adjacent to other core wildlife areas amidst intensifying motorized travel on the Grand Mesa.

Matchless Mountain*

The south side of the Matchless Mountain area contains the steep north canyon wall of Taylor Canyon, an important Big Horn Sheep production area. These rocky spires give way to conifered upper slopes, providing good lynx denning habitat, and mid-elevation forest habitat for goshawk, pine marten and elk. The area offers hiking and peak climbing opportunities to 12,000-plus foot Matchless, South Matchless, and Baldy Mountains, which all afford grand views across Taylor Park to the Collegiate Range, and the Three Apostles. This is valuable, mid-elevation interior forest habitat.

Sawtooth*

Sawtooth area, at 22,800 acres, is an important cross-basin connector within the eastern portion of the Gunnison Basin. Well-known for its excellent elk hunting and pristine quality habitat, Sawtooth, if protected, would initiate a north-south network of protected lands west of Gunnison, north to Curecanti National Recreation Area, and the West Elk Wilderness. The area is important transitional range for both the Gunnison sage grouse and Canada lynx.

Beaver and Steuben Creek*

This 14,400-acre area is a merger of Steuben Creek, Sun Park, Little Mill Creek, and Castle Creek roadless areas, and is contiguous to the southeast corner of the West Elk Wilderness. The area is north of highway 50, and 20 miles west of Gunnison. This is important low elevation habitat largely untouched by signs of development. It is readily accessible from Highway 50, but narrow dissected drainages promote solitude and a sense of naturalness. A series of southeast trending drainages and sage/shrub habitat make this some of the best critical winter range for large ungulates in the region, and sage grouse habitat extends into the eastern portion of area. There may be opportunities to enlarge the area by linking adjoining roadless BLM lands. This IRA has critical wildlife values for elk, deer, bighorn sheep, lynx and Gunnison's sage grouse.

West Elk Additions-Mount Lamborn, Beckwiths, East Elk, Beaver*

These areas are lower-elevation additions to the west side of the West Elk Wilderness Area. Covering more than 70,000 acres, the West Elk Additions provide critical big game winter and summer range for a wide variety of wildlife species. Bighorn production areas occur in the south near Cow Creek, cottonwood riparian forests support several populations of Northern leopard frog, and montane forests support northern goshawk, lynx, and cutthroat. The area contains two critical elk migration corridors: one north around local landmarks Mount Lamborn and Beckwiths the other through East Elk, Curecanti and Soap Creek to the south. This IRA has critical wildlife values for elk, deer, bighorn sheep, lynx and Gunnison's sage grouse. This area provides calving areas and summer for elk. The area provides valuable backcountry hunting experience on public lands prior to elk moving to lower private lands.

There is also a population of Colorado River Native Cutthroat trout in the streams. Second Creek is designated a native cutthroat water in Mt Lamborn Roadless Area. This stream contains a conservation population of Colorado River cutthroat trout.

Castle*

This is an extremely important wildlife area. IRA contains 8720 acres which are identified as elk summer concentration areas and production areas. It also contains a major migration route to winter ranges to the south and west. A small portion of the IRA is also identified as mule deer winter range and the western portion of the IRA has bighorn sheep overall range and a bighorn sheep lambing area. The IRA is also identified as lynx habitat and occasional individuals have been located in the area.

Wilson, Lizard Head Adjacents*

This area is roadless and a natural extension of the Lizard Head Wilderness area. It contains intact conifer, fir and spruce stands, plus open meadows on south-facing slopes, which are habitats suitable for elk, snowshoe hares, weasels, chipmunks, voles, etc. The area recommended should be protected from future motorized recreational vehicle use in winter.

Hope Lake*

As part of a large roadless complex that includes land on the adjacent San Juan National Forest, the San Miguel area exhibits a pristine alpine environment. Open meadows, brilliant wildflowers, steep slopes, jagged peaks, clear lakes and streams, and diverse wildlife, including Canada lynx, are all represented. The area offers excellent opportunities for solitude and quiet-use recreational activities.

Last Dollar-Sheep Creek*

This 6,400-acre area contains all of the wilderness qualities of the Sneffels Wilderness. The area is characterized by diverse vegetative types and provides excellent elk habitat and wildlife linkages.

Whitehouse*

This region is adjacent to the existing Mt. Sneffels Wilderness. It spans high rocky peaks of 13- to 14,000 feet with alpine tundra that supports bighorn sheep, elk and deer in the summer. This region's forested slopes may provide habitat for lynx (sporadic unconfirmed sightings), black bear, possibly wolverine (unconfirmed sightings), mountain lion, bobcat, fox, martin, an occasional moose, and the usual alpine wildlife. It may have been habitat for the last of the grizzly bears documented in this area circa the 1930's. Bighorn sheep are utilizing this area more, especially in the south and east sections of the area. This area is mapped as Bighorn sheep overall range, summer range and a migration area, black bear concentration area, elk summer range and concentration area, potential lynx habitat, mule deer summer range and overall range for Merriam turkey.

This area offers challenging climbing and hiking opportunities, sweeping vistas, mixed geology, untrammeled areas, and an opportunity for remote escape while still reasonably accessible from roads, trails and communities such as Ouray, Telluride, Ridgway, etc. With permanent snowfields on the north face of Mt. Sneffels, rock glaciers and perennial streams, this area is the headwaters of major streams (the Dallas drainages) and tributaries to the Uncompahgre River. The area is a key component of the recently introduced North San Juan Congressional Wilderness proposal.

Dominguez*

This area forms the upper watershed of Dominguez Creek, the largest perennial creek on the Uncompahgre Plateau. It is contiguous with the BLM Dominguez Wilderness Area, and

therefore offers important continuity with a large, wild roadless area. The majority of the vegetation is shrub with conifer and aspen at higher elevations, all providing excellent wildlife habitat. Much of the area is used by a population of desert bighorn sheep. The area is frequented year round by sheep, given the arid terrain and low snow amounts that the area receives. We urge that the area be managed as a roadless area given the wildlife use in the area. We also urge that expansion of OHV trails be ceased and the existing trails be used at a minimum. The disturbance on wildlife tends to have a great impact throughout the year.

Kelso Mesa*

The largest area of roadless landscape on National Forest land on the Uncompahgre Plateau, Kelso is characterized by high quality riparian habitat and stunning old-growth Ponderosa pine forests. The Kelso landscape is adjacent to the upper stretches of Dominguez Canyons and offers unique opportunities for solitude, quiet-use recreation, and horse pack-in hunting. The area is bounded on the east by public and private property. This is a very rugged and steep area. This is a great overall range for deer and elk, from calving and fawning to winter range. Much of this country has been known to hold large numbers of both. This area is inhabited by turkey, mountain lion, black bear, chukar, blue grouse, various raptors, desert bighorn, the occasional lynx and now potentially moose. This area is also known to be historic Columbian sharp-tail grouse habitat and Gunnison's sage grouse

Unaweep- Calamity Basin*

With expansive views of the La Sal Mountains, Dolores River valley, and Divide Creek area, Unaweep and the Calamity Basin encompass an inspiring corner of the Uncompahgre Plateau. The area is important as year-round wildlife habitat, including elk calving grounds.

Kannah Creek*

This large area occupies the western slopes of the Grand Mesa, exhibiting a vast diversity of habitat from piñon-juniper and riparian to aspen and spruce-fir. Kannah Creek is important not only for the wildlife habitat and quiet recreation it provides, but also because it serves as the municipal watershed for the City of Grand Junction. The proposed roadless area just touches the edge of the BLM's Adobe Badlands WSA.

Currant Creek, Flattops/ Elk Park and Salt Creek*

Forming graceful flat-topped rises, this is at the heart of the Grand Mesa National Forest at the top of the Grand Mesa. The area is made up of four distinct roadless core areas with established motorized corridors in between. This RA has significant wildlife value. Currently access is limited into this area, providing secure locations for both elk and mule deer production and migration routes, however unauthorized trails are being created from the southern forest boundary bordered by private land and from the north.

The area—dominated by conifers and aspen, with interspersed open meadows—is important habitat for a vast variety of species. The Colorado Division of Wildlife has identified the area as particularly critical for the region's black bears. All of Priest Mountain, which also includes the Elk Park and Flattops units, remains without the higher level of 'upper tier' protections under the proposed rule. Protection of this central wildland area and its water resources is crucial as the impacts of increased motorized traffic accrue on the Grand Mesa. This roadless area has essential habitat needs for several big game species.

Battlements and Sunnyside*

The northern most roadless areas of the GMUG are at high risk due to expansion of oil and gas and timber cutting. These are remarkable islands of habitat for wildlife species that are escaping the industrial activity from the lower elevations and highway activity. They should certainly be recognized and preserved not only for vast wildlife but also for the hunting and recreational opportunities that these areas provide.

Huntsman Ridge, Munsey/ Erickson, and Tomahawk*

These areas are a natural extension and boundary area of the Raggeds Wilderness Area. They are very important for connectivity for wildlife movement to the Grand mesa locales. Upper tier protection in this area would also avoid adverse sedimentation to area streams due to vehicular use of the area. It would also avoid causing an increase in game damage in the area caused by vehicular use on new roads pushing elk onto the adjoining private lands in the winter season.

Agate Creek*

This is an important area that could be a much needed wildlife refuge from the neighboring ranch land that surround it. The nearby lands in San Isabel NF would provide, if protected, for connectivity and migration patterns for elk and deer. This roadless area provides big horn sheep summer range, elk summer range and production in the Marshall Creek area, lynx habitat and movement corridor, and mule deer summer range.

Long Canyon, Johnson Basin and Windy Point*

Forming an important series of areas on the western boundary of the GMUG on the Uncompaghre Plateau, this region should provide a barrier of protection for wildlife from the probable neighborhood of industrial activity that could occur west of the area. This area is used by elk, deer, black bears, Merriam's turkey and blue grouse through out the summer, fall and winter. This area is also historic Columbian sharp-tailed grouse habitat and potential lynx habitat. It also provides remarkable quiet recreational opportunities due to it's remoteness and canyon lands.

Failes Creek/Soldier Creek, Cimarron Ridge and Baldy*

Along with Turret Ridge and Little Cimarron provide remarkable quiet use recreational opportunities for hiking and climbing enthusiasts. They boundary the popular Uncompaghre Wilderness area and are arguably among the most scenic and rugged areas in the GMUG. Wildlife abounds in this zone of dense forests and rocky crags. We support this area remaining and being managed as a roadless area. This area is critical Bighorn sheep habitat and extensive habitat improvements specifically for Bighorn sheep have been conducted in the area. Besides being critical Bighorn sheep habitat this area is mapped as bald eagle winter range, black bear summer and fall concentration area, elk winter range and winter concentration area, elk production area, potential lynx habitat, mule deer winter and summer range, and Merriam turkey overall range.

Mendicant*

There is a lot of pressure from ATV traffic on the lower end of this unit. There have been many user created ATV trails that have diminished the pristine quality and hunting experience in this area. The upper part of North Dyer Creek serves as an elk calf nursery which indicates that the area also serves as an elk calving ground in the lower aspen grooves. In mild winters, the lower end of the unit serves as winter range, thus keeping elk off of even lower private ranches. Dyer Creek and its several branches sustain a brook trout fishery that would be impacted negatively by silt and sedimentation from roads and trails crossing the Dyers (West, North, South and main). The remoteness of current access assures a solitude type fishing experience.

From: David Petersen [elkheart@mydurango.net]
Sent: Wednesday, July 13, 2011 6:31 AM
To: COcomments
Subject: Stronger roadless protection needed

Friends --

Colorado cannot have both its present world-class scenery, big game populations and world-class backcountry hunting and fishing experiences—a mainstay of our state economy that attracts not only tourism and sportsmen, but also wealth and new business—and also continue the proliferation of fragmenting public lands with roads and motorized trails.

The proposed CO Roadless Rule falls short, in net, of providing the protections offered by the 2001 National Roadless Rule. If enacted as it now stands, the proposed CO Roadless Rule and those who promote it will go down in history as one of the biggest mistakes we've ever made.

Either drop the proposed state rule in favor of the 2001 national rule and work to make it better, or bring state rule protections up to national standards. Why should one of America's most wild and beautiful states have among the weakest roadless lands protections? It should not.

Sincerely,
David Petersen
POB 2466
Durango, CO 81302
970/259-3161
elkheart@mydurango.net

From: Judy Henning [jbhenning@earthlink.net]
Sent: Tuesday, July 12, 2011 3:45 PM
To: COcomments
Subject: Support Highest Level of Roadless Areas

As a member of Colorado Trout Unlimited, I have received information about the proposed roadless rules and I would urge support for the conservation alternative 4.

But my support does not come just from my fishing interests, for mostly I have enjoyed the Colorado River and Williams Fork River in vehicle accessible places.

For over 30 years my family was part owner of a small ranch property on North Battle Creek that backed up to the Williams Fork Mountains (or the back side of the Blue Ridge as we knew it). Though we didn't hunt, our friends did. The climb up the Blue Ridge from our side was arduous, but the number of hunters who took the challenge was surprising. Carrying out the carcass worked up an appetite for elk meat.

They would not have had spectacular hunting had it not been for the remoteness and lack of roads. During the fall we would watch herds of over 200 to 300 elk flow along the ridges above the ranch. In spring we shared the hay meadow and its creek with young calves who romped through the water. We hiked up the hills to a solitude filled with birds, wildflowers, small scampering animals and the larger coyotes, badgers, bears and other occasional visitors.

We had to sell the property, but it went to an owner who has continued a conservation easement. There are not enough owners who can afford to do that and preserve such wilderness. That is why we need roadless areas protected by regulations.

My kids got to experience the West at its best. I want other children to be able to do the same.

Judy Henning
7545 E. Gunnison Pl.
Denver CO 80231

From: mick@sopris.net
Sent: Wednesday, July 13, 2011 1:54 PM
To: Kurt Kunkle | Colorado Environmental Coalition
Cc: COcomments
Subject: erroneous letter
Attachments: Roadless ltr 071311.pdf

Dear Kurt and USFS:

In attempting to submit an independent comment, I accidentally transmitted the form letter from a web site.

--- kurt@ourcolorado.org wrote:

From: Kurt Kunkle | Colorado Environmental Coalition <kurt@ourcolorado.org>
To: mick@sopris.net
Subject: Thank You for Taking Action
Date: Wed, 13 Jul 2011 15:44:52 -0500 (CDT)

Thank you for writing to the Forest Service asking them to protect Colorado's Roadless Areas.
Your message has been sent to the following decision makers:

- Colorado Roadless Comments

If you want to learn more about this issue, check out our [web site](#), and don't forget to join in the conversation on [CEC's Blog](#), [Twitter](#) and [Facebook](#).

Thanks,

Kurt Kunkle

Colorado Environmental Coalition



[nonprofit software](#)

Michael C Ireland
515 Independence Place
Aspen, CO 81611
970-920-2858
mick@sopris.net

Colorado Roadless Rule/EIS

To whom it may concern;

I am concerned that the new rule being proposed by the USFS may undermine important protections for Colorado's national forests. As you may know, I was invited to testify on roadless area protection in 2007 and did so, citing concerns about the recognition of old mining roads as impediments to wilderness protection.

As we begin to understand the impacts of natural gas exploration, it is important that roadless areas recommended as suitable for top tier protection be managed at the highest level of protection. Of particular concern are the notions that the 2001 Rule is weakened by the proposed rule and that even the top tier lands are susceptible to development for transmission and pipelines.

My recollection is that the 2001 rule itself was a step back from earlier levels of protection and was, as such, described as a compromise.

The City of Aspen has made and continues to make efforts to produce renewable energy locally. Our efforts and those of other communities are undermined by the creation of defacto subsidy for power transmission from coal fired plants to rural areas.

My understanding is that the Pitkin County Commissioners are aligned with my concerns on this matter and I support their comments to that effect that are consistent with the concerns summarized above.

Mick Ireland
Mayor of Aspen

From: Lisa Leben [lleben@co.clear-creek.co.us]
Sent: Wednesday, July 13, 2011 2:22 PM
To: COcomments
Subject: CO Roadless Rule Comment
Attachments: CCC Roadless Rule Comments.pdf

Attached is Clear Creek County's comment letter on the Colorado Roadless Rule/EIS.

Thank you for your time and consideration.

Sincerely,

Lisa R. Leben
Special Projects Division Director
Clear Creek County
303-679-2434
lleben@co.clear-creek.co.us



Clear Creek County

POST OFFICE BOX 2000
GEORGETOWN, COLORADO 80444

TELEPHONE: (303) 569-3251 • (303) 679-2300

July 13, 2011

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

Re: **PROPOSED COLORADO ROADLESS AREA MANAGEMENT**

Dear Sir/Madam,

Clear Creek County submits the following comments on the proposed Colorado Roadless Rule ("Rule") and associated Revised Draft Environmental Impact Statement ("RDEIS"). Approximately 68% of Clear Creek County is within the Arapaho-Roosevelt National Forest and approximately 34% , or 58,364.22 acres, of that area is proposed to be designated Colorado Roadless Area ("CRA").

Federal land management of the Forest System lands in our County impacts the watershed health, economic development potential and future opportunities of our local communities. This letter does not intend to cover all of the local issues which have been raised regarding the proposed Rule, and we hope you will give consideration to the comments of other entities in our community. Given the proposed rule will have impacts on 1/3 of the area of Clear Creek County, we request your consideration on the following issues:

I. Henderson Mine

Clear Creek County is the home of the Henderson Mine which, along with the Mill located in Grand County, is the world's largest primary producer of molybdenum and serves as a key mineral resource for both Colorado and the United States. The owner of the Mine, Freeport-McMoRan Copper & Gold, Inc. ("Climax"), has repeatedly brought it to the attention of the USFS and Colorado Department of Natural Resources during previous Roadless Rule public comment periods that the proposed roadless areas surrounding the Henderson Mine should be removed from the roadless area inventory and not be subject to regulation by the Roadless Rule.

The CRA delineation around the Freeport private lands has not been given adequate consideration regarding the public health and safety issues related to the current large industrial mining operations and on-going prospecting. In order to ensure maximum health and safety, management activities should not be restricted in this area as it will diminish Climax's ability to sufficiently, responsibly and rapidly respond to emergency situations (i.e. wild land fires).

The boundaries of the inventoried roadless area and upper tier designations should be modified to remove all areas north of the Henderson Mine facility from the Climax fee lands to the Vasquez Adjacent Area, as proposed by Freeport. Being in the immediate vicinity of a large industrial complex, the CRA designation in this location is inconsistent with roadless area characteristics identified in Section 294.41, specifically: #7 (landscape contains industrial mining complex which has been in operation in this area for over 30 years); #9 (this is a significant mineral resource area which is subject to unpatented mining claims).

We fully support Climax's requests in their comment letter regarding the Roadless Rule dated July 14, 2011.

II. Guideway system/transportation issues.

On June 16, 2011 The Colorado Department of Transportation and Federal Highway Administration concluded the 11 year process of a Programmatic Environmental Impact Statement for the I-70 Mountain Corridor with the signing of the Record of Decision (ROD). This programmatic study is a Tier 1 document that will be followed by site-specific Tier 2 studies. The geographic area covered by the ROD is the I-70 corridor from C-470 to Glenwood Springs.

The Preferred Alternative of the ROD is explained as follows: "The general location of improvements follows the existing I-70 Mountain Corridor alignment and serves established Corridor communities. Throughout the Corridor, improvements may be north or south of the existing I-70 highway alignment, or within the highway median, but not necessarily within existing right-of-way." (ROD Page 6) The final determination regarding the actual alignment of improvements will be made in Tier 2 studies.

"An Advanced Guideway System is a central part of the Preferred Alternative and includes a commitment to the evaluation and implementation of an Advanced Guideway System within the Corridor, including a vision of transit connectivity beyond the study area and local accessibility to such a system." (ROD, Page 3)

The CRA deals with forest road systems but does not seem to recognize the state and federal transportation systems that pass through the forest, so we interpret this lack of recognition of the larger transportation system as problematic.

Two possibilities for dealing with the I-70 Mountain Corridor improvements are:

1. On Page 4, in the Summary, add a 6th point of state-specific situations and concerns: "Accommodating improvements identified in the I -70 Mountain Corridor Record of Decision;" and/or
2. Include the ROD in the Chapter 2 listing of "Reserved and Outstanding Rights" or "Existing Land Use Authorizations" (page 43, 44) subject to ordinary NEPA requirements, but not subject to CRA or Upper Tier requirements.

III. "Pre-existing Water Court Decree" Definition.

Clear Creek County has been actively pursuing the purchase of water rights and the development of reservoirs to develop water resources, one of the identified purpose and needs for the Rule. Some of the reservoir sites for which the County has obtained or is seeking court decrees for "conditional water rights" are on proposed Roadless Areas. Developing a water project is a complex and time consuming endeavor and Colorado has long recognized "conditional water rights" as a means to adjudicate a protectable water right while the project is being built. A conditional water right awards a priority for a given amount of water to be diverted and stored in defined amounts for specific purposes. Upon completion of the project, the conditional water right is made absolute and the priority relates back to the date of the conditional water right. The decree making a conditional water right absolute is typically done under a different Water Court case number but it references the original conditional water right case number as well. In order to make a conditional water right absolute, the water must be diverted and applied to beneficial use. Therefore, a conditional water right is one "pursuant to which a water conveyance structure is operated," to use the terminology of proposed 36 CFR §294.44(b)(1), before the water right is made absolute. We read the proposed rule's definition of "Pre-existing Water Court Decree" to include Colorado decreed conditional water right – this rule is written exclusively for Colorado, after all – and, hence, to also include decrees making conditional rights absolute, when the decree granting the conditional right preceded the Roadless Rule although it is not made absolute until after the Rule.

We believe you should confirm that in the definition.

IV. Future water reservoirs.

Clear Creek County has three planned reservoir sites in the Bakerville and Leavenworth areas, for which it has applied for or received conditional water rights to store water for domestic uses, which could be affected by the proposed rule. Two are in the zone identified as a native cutthroat trout catchment area and all three are partially within the proposed CRA. (See Exhibit A)

The Rule addresses, through an exception, the right to construct, reconstruct, or maintain an authorized water conveyance structure which is operated pursuant to a pre-existing water court decree, an exception to the general prohibition against linear construction zones in the CRAs (36 CFR §294.44b)(1). However, for the exception to apply, it must be determined **"Within a native cutthroat trout catchment or identified recovery watershed, a linear construction zone will not diminish, over the long-term, conditions in the water influence zone and in the native cutthroat habitat."** (§294.44(b)(4)(iii).)

The RDEIS acknowledges "...Water conveyance structures change the stream flow regime." (Page 153) That seems undeniable. In so doing, however, have you not acknowledged that it will be impossible or unduly burdensome to satisfy the condition to exercising the exception? We recommend these sections expressly allow "reasonably possible" mitigation even if the habitat is diminished over the long term.

V. Section 294.43 (road construction on non-Upper Tier Areas) Clarification.

A phrase at the beginning of proposed 36 CFR §294.43©(2) requires clarification. The section begins, "If proposed road construction/reconstruction meets one of the exceptions [referring to a list of 9 exceptions], subject to the legal rights identified in 36 CFR 294.43©(1) [referring to one of the 9 exceptions], the following must be determined [by the Responsible Officer]:..."

We interpret this to mean that the findings prescribed in §294.43©(2) are not applicable when the exception pursuant to which a road construction/reconstruction is proposed is when "a road is needed pursuant to reserved or outstanding rights, or as provided for by statute or treaty," the exception identified in ©(1)(i). Nevertheless, the statement is ambiguous; does the phrase "subject to the legal rights..." act as a limitation on the occasions when the Responsible Officer is required to make the determinations (s/he cannot make a determination when the legal rights apply) as we interpret it, or does it act as a limitation on the Responsible Officer's discretion in making the determinations (s/he cannot make a determination in conflict with the "legal rights" always)?

Sometimes an economy of words is false economy. We recommend the section be clarified.

VI. Mining Rights

Clear Creek County is an historic hard rock mining area.

The Draft EIS states, "Locatable mineral resource activities are non-discretionary [to USFS]. The public has a statutory right to come onto public domain land to prospect, explore, and develop locatable mineral resources, and the Forest Service cannot prohibit this activity on these NFS lands. Therefore, none of the proposed alternatives would affect the statutory right of reasonable access to prospect, explore and develop NFS lands open to mineral entry and location." (Page 129, 1st ¶.)

We understand that reasonable access to private lands which must cross Forest lands are the same, subject to reasonable regulation by virtue of the Forest Service Organic Administration Act,

Federal Lands Policy Management Act, Alaska National Interest Land Conservation Act, and other laws and court decisions. The Rule applies yet another layer of regulation of that access.

The additional layer of regulation which is certainly new with the proposed rule is that road construction/reconstruction and power for extraction operations be found to not "diminish, over the long-term, conditions in the water influence zone and in the native cutthroat habitat" if constructed in a native cutthroat trout catchment or identified recovery watershed. (Proposed 36 CFR §§294.43(b)(2)(iii), 294.43(c)(2)(iii) and 294.44((b)(4)(iii). If we correctly interpret §294.43(c)(2) – discussed in Comment V ABOVE – this layer of regulation would not apply to road construction/reconstruction in non-Upper Tier Areas.) This appears to be an absolute prohibition if impacts cannot be fully mitigated. The history of Clear Creek County, and perhaps its future, includes substantial mining in native cutthroat habitat. Mining country does not necessarily offer alternatives to access or opportunities for mitigation; there may be no ability to fully mitigate impacts. We question, therefore, an additional layer of regulation that includes an absolute or potentially absolute prohibition against access or linear construction zones in native cutthroat habitat. We recommend these sections expressly allow "reasonably possible" mitigation even if the habitat is diminished over the long term.

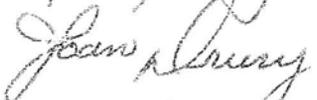
We appreciate the effort that has gone into getting this far in the endeavor to respond to the state's petition and the opportunity of commenting on the proposed Rule. We believe these few changes are important for Colorado as well as Clear Creek County, as well the Forest.

Sincerely,

CLEAR CREEK BOARD OF COUNTY COMMISSIONERS



Kevin J. O'Malley, Chairman



Joan Drury, Commissioner



Timothy J. Mauck, Commissioner

Cc: Mike King, Colorado Department of Natural Resources
Robert Randall, Colorado Department of Natural Resources

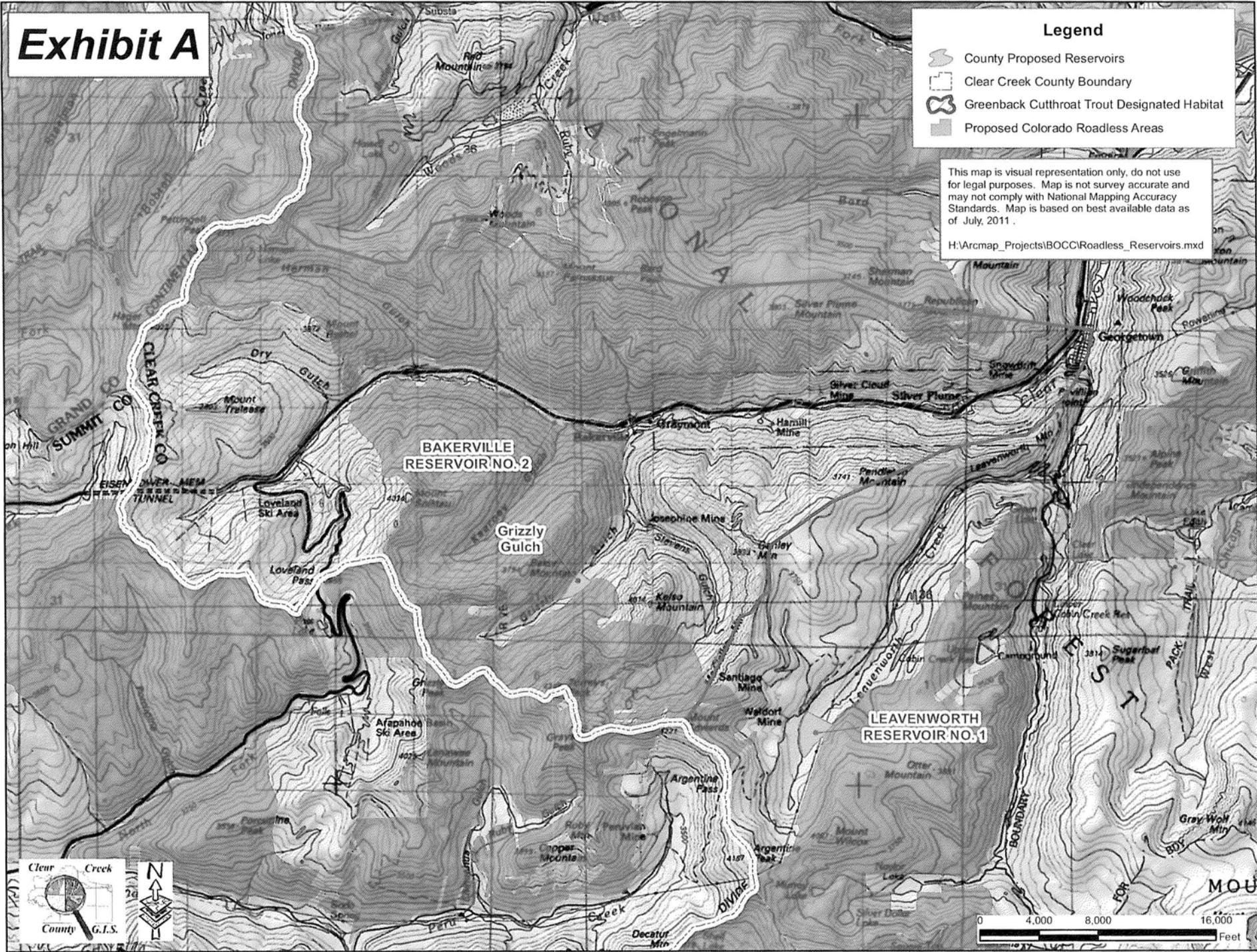
Exhibit A

Legend

- County Proposed Reservoirs
- Clear Creek County Boundary
- Greenback Cutthroat Trout Designated Habitat
- Proposed Colorado Roadless Areas

This map is visual representation only, do not use for legal purposes. Map is not survey accurate and may not comply with National Mapping Accuracy Standards. Map is based on best available data as of July, 2011.

H:\Arcmap_Projects\BOCC\Roadless_Reservoirs.mxd



Clear Creek County G.I.S.

Scale: 0, 4,000, 8,000, 16,000 Feet

COR 537

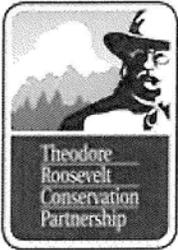
From: Nicholas Payne [npayne@trcp.org]
Sent: Wednesday, July 13, 2011 1:55 PM
To: COcomments
Subject: Sportsmen Business Sign-On Letter
Attachments: image003.jpg; CO Backcountry Business USDA Sign-On Letter (7-12-2011).pdf

To Whom it May Concern,

Attached and embedded below is a sign-on letter being submitted on behalf of 69 hunting and fishing related businesses and organizations throughout Colorado supporting a strong roadless rule that adequately safeguards fish and wildlife and our hunting and fishing traditions.

Thanks,

Nick Payne
Colorado Field Representative
Theodore Roosevelt Conservation Partnership
1440 Williams St.
Denver, CO
847.682.5003
npayne@trcp.org
trcp.org



July 12, 2011

Tom Vilsack
Secretary, U.S. Department of Agriculture
1400 Independence Ave. S.W.
Washington, DC 20250

Dear Mr. Secretary:

We, the undersigned Colorado hunting and fishing businesses and groups, are writing to request your commitment to and support of fish and wildlife conservation and our hunting and fishing traditions by developing a strong Colorado roadless rule that safeguards top quality habitat, the most valued hunting and fishing areas and the maximum acreage of public land fish and wildlife habitat.

Commonly known as backcountry, Colorado's 4.2 million acres of national forest roadless areas provide unique opportunities for sportsmen to pursue fish and game. Colorado has more elk and mule deer than any other state in the nation, a condition that has been enabled by the conservation of backcountry areas that provide "core habitat." Core habitat areas, where fewer disturbances to wildlife have been shown to maintain higher reproduction and survival rates in elk, allow wildlife managers to maintain strong wildlife populations. The benefits to hunting and fishing extend beyond roadless area boundaries: Backcountry lands help game species expand their ranges, thereby providing more opportunity for hunters on public lands throughout the state.

Backcountry areas are strongholds for the last remaining native trout in Colorado, offering unrivaled opportunities for anglers to fish for species such as Colorado River cutthroat, Rio Grande cutthroat and greenback cutthroat. The headwater streams and rivers

that flow through roadless areas provide cover and refuge for these fish. Too much human disturbance and too many roads can increase sediment loads in waterways and lower the quality of spawning habitat, decreasing the likelihood that these native trout can be sustained. Conserving headwater streams and rivers in roadless areas increases downstream habitat quality and fishing opportunity, as well.

Hunting and fishing contribute more than \$1.8 billion annually to Colorado's economy and often form the backbone of our state's rural economies. Without strong safeguards that conserve public-lands backcountry, hunting and fishing opportunities could diminish and, likewise, the economic vitality of the businesses and communities that rely on them could decline. Conserving our valued roadless areas can sustain our economy and Western way of life.

On behalf of Colorado sportsmen, we thank you for your hard work and urge you to make every effort to conserve Colorado's backcountry traditions through a responsive and thorough Colorado roadless rule that maximizes the acreage and quality of public land fish and wildlife habitat being sustained in our national forests. A strong management document will ensure that hunting and fishing remain a fixture of living and recreating in Colorado.

Sincerely,

Organizations

Bull Moose Sportsmen's Alliance
 Colorado Bowhunters Association
 Colorado Trout Unlimited
 Colorado Backcountry Hunters & Anglers
 Colorado Wildlife Federation
 Theodore Roosevelt Conservation Partnership
 Western Native Trout Initiative

Businesses

Al Ritt Flies
 Anglers Covey Fly Shop
 Angler's Roost Fly Fishing Company
 Ark Anglers
 Arkansas River Tours
 Aspen Flyfishing Inc
 Aspen Outfitting Co
 B & L Quality Taxidermy
 Basalt Firearms LLC
 Bear's Archery, Guns and Prospecting
 Bill Dvorak's Kayak and Rafting Expeditions
 Bill Pellegrino's Archery Hut
 Black Dog Inn
 Blades-N-Bullets
 Blue River Anglers
 Bob's Fly Tying Specialties
 Breckenridge Outfitters
 Brothers Processing
 Bucking Rainbow Outfitters
 Clear Creek Outdoors
 Cutthroat Anglers
 Elephant Head Taxidermy
 Elkhorn Fly Rod & Reel
 Elkhorn Outfitters
 Flattops Archery Supply
 Flight-feather taxidermy
 Fly Wheel
 Front Range Anglers
 Frying Pan Anglers
 Gardenswartz Sports

Location

Longmont
 Colorado Springs
 Fort Collins
 Salida
 Cotopaxi
 Aspen
 Aspen
 Steamboat Springs
 Basalt
 Glenwood Springs
 Nathrop
 Colorado Springs
 Phippsburg
 Canon City
 Frisco
 Loveland
 Breckenridge
 Craig
 Steamboat Springs
 Idaho Springs
 Silverthorne
 Golden
 Loveland
 Craig
 Rifle
 Loveland
 Denver
 Boulder
 Basalt
 Durango

Goods for the Woods
Greenback Alley
Gunnison River Expeditions
Gunnison River Pleasure Park
Gunsmoke Taxidermy
Hook Flyfishing
J's New and Used Sport
Kelley's Gunsmithing
Laughing Grizzly Fly Shop
Lines Hardware Companies
Mountain Angler
Mountain Pawn & Gun
North Rim Hunt Club
North Rim Trophy Hunts
Outlaw Bait & Tackle
Padilla's Mesa General Store
Roadrunner Bait
Roaring Fork Anglers
San Juan Anglers
Ski & Bow Rack
Sportsman Depot
St. Peter Fly Shop
Straightline Sports
Steamboat Flyfisher
Tenderfoot Lodge
The Blue Quill Angler
The Flysmith
Trophy Mount Care
Uncompahgre Hunt Club
Western Anglers
Winterhawk Outfitters
Wolf Creek Anglers

Durango
Highlands Ranch
Delta
Lazear
Craig
Highlands Ranch
Salida
Meeker
Longmont
Nathrop
Breckenridge
Salida
Hotchkiss
Hotchkiss
Colorado Springs
Mesa
Colorado Springs
Glenwood Springs
Durango
Pagosa Springs
Montrose
Fort Collins
Steamboat Springs
Steamboat Springs
Keystone
Evergreen
Cortez
Empire
Delta
Grand Junction
Collbran
Pagosa Springs

July 12, 2011

Tom Vilsack
Secretary, U.S. Department of Agriculture
1400 Independence Ave. S.W.
Washington, DC 20250

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Backcountry areas are strongholds for the last remaining native trout in Colorado, offering unrivaled opportunities for anglers to fish for species such as Colorado River cutthroat, Rio Grande cutthroat and greenback cutthroat. The headwater streams and rivers that flow through roadless areas provide cover and refuge for these fish. Too much human disturbance and too many roads can increase sediment loads in waterways and lower the quality of spawning habitat, decreasing the likelihood that these native trout can be sustained. Conserving headwater streams and rivers in roadless areas increases downstream habitat quality and fishing opportunity, as well.

Hunting and fishing contribute more than \$1.8 billion annually to Colorado's economy and often form the backbone of our state's rural economies. Without strong safeguards that conserve public-lands backcountry, hunting and fishing opportunities could diminish and, likewise, the economic vitality of the businesses and communities that rely on them could decline. Conserving our valued roadless areas can sustain our economy and Western way of life.

On behalf of Colorado sportsmen, we thank you for your hard work and urge you to make every effort to conserve Colorado's backcountry traditions through a responsive and thorough Colorado roadless rule that maximizes the acreage and quality of public land fish and wildlife habitat being sustained in our national forests. A strong management document will ensure that hunting and fishing remain a fixture of living and recreating in Colorado.

Sincerely,

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Colorado Bowhunters Association
Colorado Trout Unlimited

Colorado Backcountry Hunters & Anglers
 Colorado Wildlife Federation
 Theodore Roosevelt Conservation Partnership
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 Flight-feather taxidermy
 Fly Wheel
 Front Range Anglers
 Frying Pan Anglers
 Gardenswartz Sports
 Goods for the Woods
 Greenback Alley
 Gunnison River Expeditions
 Gunnison River Pleasure Park
 Gunsmoke Taxidermy
 Hook Flyfishing
 J's New and Used Sport
 Kelley's Gunsmithing
 Laughing Grizzly Fly Shop
 Lines Hardware Companies
 Mountain Angler
 Mountain Pawn & Gun
 North Rim Hunt Club
 North Rim Trophy Hunts

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 Aspen
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 Steamboat Springs
 Basalt
 Glenwood Springs
 Nathrop
 Colorado Springs
 Phippsburg
 Canon City
 Frisco
 Loveland
 Breckenridge
 Craig
 Steamboat Springs
 Idaho Springs
 Silverthorne
 Golden
 Loveland
 Craig
 Rifle
 Loveland
 Denver
 Boulder
 Basalt
 Durango
 Durango
 Highlands Ranch
 Delta
 Lazear
 Craig
 Highlands Ranch
 Salida
 Mecker
 Longmont
 Nathrop
 Breckenridge
 Salida
 Hotchkiss
 Hotchkiss

Outlaw Bait & Tackle
Padilla's Mesa General Store
Roadrunner Bait
Roaring Fork Anglers
San Juan Anglers
Ski & Bow Rack
Sportsman Depot
St. Peter Fly Shop
Straightline Sports
Steamboat Flyfisher
Tenderfoot Lodge
The Blue Quill Angler
The Flysmith
Trophy Mount Care
Uncompahgre Hunt Club
Western Anglers
Winterhawk Outfitters
Wolf Creek Anglers

Colorado Springs
Mesa
Colorado Springs
Glenwood Springs
Durango
Pagosa Springs
Montrose
Fort Collins
Steamboat Springs
Steamboat Springs
Keystone
Evergreen
Cortez
Empire
Delta
Grand Junction
Collbran
Pagosa Springs

From: Joel Webster [jwebster@trcp.org]
Sent: Wednesday, July 13, 2011 2:11 PM
To: COcomments
Subject: Sportsmens Solutions for the Colorado Roadless Rule
Attachments: Proposed CO Rule Sportsmens Solutions 6_2011.PDF; Proposed CO Rule Sportsmens Solutions Cover Letter 6_2011.PDF

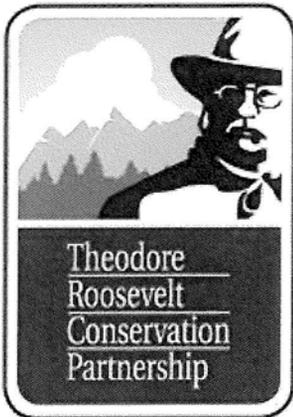
Dear Planning Team,

Please consider the attached sportsmen's solutions for the Colorado roadless rule.

Sincerely,

Joel

Joel Webster
Director - Center for Western Lands
Theodore Roosevelt Conservation Partnership
8 Carriage Way
Missoula, MT 59802
406.360.3904



BACKCOUNTRY HUNTERS & ANGLERS; BULL MOOSE SPORTSMEN ALLIANCE;
COLORADO BACKCOUNTRY HUNTERS & ANGLERS; COLORADO TROUT
UNLIMITED; COLORADO WILDLIFE FEDERATION; NATIONAL WILDLIFE
FEDERATION; THEODORE ROOSEVELT CONSERVATION PARTNERSHIP; TROUT
UNLIMITED; WESTERN NATIVE TROUT INITIATIVE

June 29, 2011

The Honorable Tom Vilsack
Secretary
U.S. Department of Agriculture
1400 Independence Ave., S.W.
Washington, DC 20250

Tom Tidwell
Chief
U.S. Forest Service
1400 Independence Ave., S.W.
Washington, DC 20250

Dear Mr. Secretary and Chief Tidwell:

Our collective organizations represent tens of thousands of sportsmen across Colorado and hundreds of thousands of sportsmen across America. We are working together to help create a Colorado roadless rule that benefits fish, wildlife and our sporting traditions. We believe that shortfalls remain in the recently proposed Colorado roadless rule and offer the accompanying "Sportsmen's Solutions" to broker a successful conclusion to this rulemaking process and the lands and people it will affect.

Sportsmen have been meeting with representatives from the state and U.S. Forest Service throughout the development of the Colorado roadless rule. This issue is important to our constituency because Colorado possesses public land hunting and fishing opportunities found nowhere else in America. Exceptions allowing road building and development in roadless areas must be narrowly and clearly defined in order to uphold quality public hunting and fishing and to maintain the more than \$1 billion generated in Colorado each year from hunting- and fishing-related activities.

Similar to a written statement made by USDA Secretary Vilsack in April of 2010, sportsmen believe that Colorado's roadless areas should be conserved at a level, on balance, that is equal to or stronger than the protections afforded by the 2001 national rule. While improved over previous versions, the proposed Colorado rule does not live up to that standard.

Fortunately, we have an opportunity to fix the Colorado rule and ensure the responsible management of these valuable backcountry lands. To that end, we ask that you adopt the accompanying "Sportsmen's Solutions" to resolve problems with the regulatory language in the proposed rule. Many within our community will provide specific recommendations for an expanded upper tier category of lands in the near future.

Sincerely,

Backcountry Hunters & Anglers
Jim Akenson, Executive Director

Bull Moose Sportsmen Alliance
Gaspar Perricone, Co-Director

Colorado Backcountry Hunters & Anglers
David Lien, Co-Chairman

Colorado Trout Unlimited
David Nickum, Executive Director

Colorado Wildlife Federation
Suzanne O'Neill, Executive Director

National Wildlife Federation
John Gale, Regional Representative

Theodore Roosevelt Conservation Partnership
Whit Fosburgh, President & CEO

Trout Unlimited
Steve Moyer, VP for Conservation Programs

Western Native Trout Initiative
Robin Knox, Coordinator

Sportsmen's Solutions for the Proposed Colorado Roadless Rule

Problem 1: At 562,000 acres, the upper tier category in the preferred alternative is too small and fails to include much of the most important fish and wildlife habitat.

Solution: The forest service should significantly increase the acreage of upper tier lands in the preferred alternative. All Alternative 2 lands already placed in upper tier should remain and all upper tier lands in Alternative 4 that are important for fish and wildlife habitat and hunting and fishing should be moved into the preferred alternative upper tier category. Many within our community will provide specific recommendations for an expanded upper tier category of lands in the near future.

Rationale: The upper tier category has been created to balance narrowly defined exceptions in the CO rule such as coal mining, ski area development, and community protection zone logging. This is very similar to the "Primitive" and "Wild Land Recreation" categories used to balance development allowances in the Idaho roadless rule. While important, the preferred alternative (alt. 2) acres are limited to areas where forest plans already prohibit road building. Using these acres as upper tier does not address key fish and wildlife habitat nor does it illustrate a commitment by the Forest Service to go beyond their current plans and create a truly protective rule.

As drafted, about 14% of the overall acreage in the proposed Colorado rule is upper tier while Idaho upper tier areas represent about 33% of the overall acreage. In order for the Colorado rule to be a similar success to the Idaho rule, the final upper tier category must be expanded and include the Colorado roadless areas with key fish and wildlife habitat and high quality hunting and fishing.

Problem 2: Linear Construction Zones are allowed in upper tier areas, threatening the highest value CRAs with transmission corridors, water projects, and oil and gas pipelines.

Solution: Linear Construction Zones should be prohibited in areas designated as upper tier. To correct this problem, § 294.44 should be changed to the following:

§ 294.44 Prohibition on linear construction zones.

- (a) *General.* A linear construction zone may not be constructed or reconstructed in Colorado Roadless Areas except as provided in paragraphs (b) and (c) of this section.
- (b) *Upper Tier Acres.* Notwithstanding the prohibition in paragraph (a) of this section, a linear construction zone may only be constructed or reconstructed in Colorado Roadless Area upper tier acres if the Responsible Official determines that:
 - (1) A linear construction zone is needed pursuant to reserved or outstanding rights, or as provided for by statute or treaty.
- (c) *Non-Upper Tier Acres.* Notwithstanding the prohibition in paragraph (a) of this section, the Regional Forester may authorize a linear construction zone within a Colorado Roadless Area outside upper tier acres for:

Rationale: The upper tier category will not truly conserve the highest value roadless areas as long as the linear construction zone loophole exists for this category of lands. The LCZ loophole must be closed.

Problem 3: The proposed CO rule does not require NSO stipulations for oil and gas development in areas designated as upper tier, jeopardizing the characteristics of high value roadless areas.

Solution: The following language should be included in the CO rule:

§ 294.46 Other Activities.

For mineral leases, contracts, permits, and other associated activities authorized after the effective date of this subpart the Forest Service will not recommend, authorize, or consent to road construction, road reconstruction, linear construction zones, or surface occupancy associated with mineral leases in Colorado Roadless Areas designated as upper tier.

Rationale: Colorado roadless areas designated as upper tier should receive maximum safeguards from surface developments that would jeopardize their primitive character. Further, upper tier areas in the Idaho roadless rule received NSO protections and the Colorado roadless rule must do the same in order to replicate this success.

Problem 4: Common variety mineral entry is allowed in upper tier areas, jeopardizing the characteristics of high value roadless areas.

Solution: Withdraw upper tier areas from entry for common variety minerals. The following language should be included in the Colorado rule:

§ 294.46 Other Activities

Common Variety Minerals. After [final rule effective date], the Forest Service will not authorize the sale of common variety mineral materials in Colorado roadless acres designated as upper tier.

Rationale: Colorado roadless areas designated as upper tier should receive maximum safeguards from surface developments that would jeopardize their primitive character. Upper tier areas in the Idaho roadless rule were withdrawn from common variety mineral entry and the Colorado roadless rule must do the same in order to replicate this success.

Problem 5: Linear Construction Zone definition does not keep LCZs within right of ways.

Solution: LCZs should only be allowed within right of ways and the regulatory language should read as follows:

§ 294.44 Prohibition on linear construction zones.

(c) *Linear construction zone decommissioning.* Where a linear construction zone is constructed in a Colorado Roadless Area, installation of the linear facility will be done in a manner that minimizes ground disturbance and shall be located entirely within right-of-ways.

It is also recommended that the definition in §294.41 of the proposed Colorado rule for an LCZ be changed to:

A temporary linear area of surface disturbance located within a right of way that is used for motorized transport by vehicles or construction equipment to install a linear facility. It is not used as a motor vehicle route and is not engineered to road specifications.

Rationale: LCZ should be located within right of ways to minimize surface disturbance and conserve the surface values of roadless areas. Allowing LCZs to be constructed outside of right of ways creates opportunities for abuse where land managers could essentially create temporary roads under the name of LCZs.

Problem 6: Substantially greater environmental damage language in Linear Construction Zone requirements is vague and lacks clarity.

Solution: Clarify the regulatory language by defining the term “substantially greater environmental damage.”

Rationale: Without a clear definition of “substantially greater environmental damage,” it could be difficult for the Forest Service to make consistent decisions when denying and allowing LCZs and those decisions could be legally vulnerable. It is easy to imagine a situation where a roadless mountain range lies between one utility installation and another and the company would have to go all the way around the mountain range, deal with multiple land owners and agencies, and incur much greater costs than simply building the utility over the range. The company could then argue, and would have the financial and other motivations to do so, that by going over the range it would cause less environmental damage. If the Forest Service disagreed, they would have no supporting language in the rule to substantiate their claim.

Problem 7: High Quality Fish and Wildlife Habitat Not Assured After Timber Cutting

Solution: All projects under §294.42(c)(1) through (3) should include the following language:

“Be developed in coordination with the Colorado Division of Wildlife.”

Rationale: Colorado’s roadless areas provide world class fish and wildlife habitat and it is important that those values are maintained and enhanced over the long term. Requiring coordination with the Colorado Division of Wildlife will provide additional certainty that fish and wildlife receive due consideration in the planning and implementation of timber cutting projects.

Problem 8: Language to safeguard cutthroat trout populations during development activities has been weakened in proposed rule.

Solution: Remove the language “over the long term” and add language stating that “activities cannot alter, damage, or destroy native cutthroat trout populations” at § 294.43(b)(2)(iii), § 294.43(c)(2)(iv), and § 294.44(b)(4)(iii).

Rationale: The final Colorado roadless rule petition required that activities within native cutthroat catchments not diminish watershed conditions while the recently proposed rule includes the added language, “over the long term.” Sportsmen believe this could lead to extirpation of small distinct cutthroat populations during activities because there is no prohibition on impacting trout populations, only that they retain watershed conditions over the long term. Even if conditions are restored over the long term, there are no requirements that sustainable native trout populations are retained during a project. Further, “over the long term” is ambiguous. Does this mean 5 years, 20 years, or 100? If this language is to remain, the long term should be defined and additional language should be added requiring the sustainability of native trout populations.

Problem 9: Language regarding determination of whether activities will diminish conditions for native cutthroat trout is problematic at §294.43(b)(2)(iii). The rule makes no mention of what would occur if it was determined the project would diminish conditions.

Solution: Add the following to the regulatory language:

“if it is determined that a non-discretionary project would diminish conditions in the water influence zone and/or in native cutthroat habitat, the Regional Forester will require a plan for protecting native cutthroat populations and their habitat during project activities that insures activities will not alter, damage, or destroy native cutthroat trout populations”.

Rationale: Without adding language for how to proceed in the event a project diminishes conditions in the water influence zone and/or in native cutthroat habitat, there is no assurance that a project would not drastically damage or even destroy a cutthroat population. This omission leaves the Forest Service legally vulnerable and does not adequately protect native trout populations.

From: Karin Teague [karin@teaguearch.com]
Sent: Wednesday, July 13, 2011 10:59 AM
To: COcomments
Cc: AgSec@usda.gov; ttidwell@fs.fed.us
Subject: Colorado Roadless Rule comment
Attachments: CO roadless comments.doc

Dear Comment Team, attached is my letter commenting on the proposed Colorado Roadless Rule. As a member of the Basalt Town Council, in the heart of the Rocky Mountains in Colorado, this matter is of great interest to me and my constituents. Please let me know if you have any questions.

Thank you,

Karin Teague
Councilor, Town of Basalt

Comment Team
Colorado Roadless Rule
P.O. Box 1919
Sacramento, CA 95812

Dear Comment Team:

Thank you for the opportunity to provide comment on the draft proposed rule for Colorado's roadless forests. National forest roadless lands include some of Colorado's largest and most critical unprotected backcountry—safeguarding important habitat and wildlife migration routes and providing world-class opportunities to explore the great outdoors. The quality-of-life for our residents, and a draw for visitors and guests, depends on these backcountry areas.

As a member of the Town Council of Basalt, Colorado I understand the value these backcountry lands have for our community. Our national forest roadless areas include the source waters for many municipal supplies; and Basalt depends on the roadless lands of the Basalt Mountain Roadless Areas to provide groundwater recharge for our municipal water supplies.

But after nearly a decade of protection under the National Roadless Rule, Colorado's forests could soon be managed to a weaker standard. While the Obama administration has pledged to craft a Colorado rule that is 'as protective or preferably more protective' than the National Roadless Rule, the draft proposal still falls short of meeting that commitment.

An improvement in the current proposed rule from earlier versions is the 'upper tier' of protection for high quality roadless lands. The agency has identified more than 2.8 million roadless acres for 'upper tier' protections in one or another of its environmental study alternatives but is only proposing just over 560,000 acres, about 13%, of the state's roadless areas for these protections. And flaws in the proposed rule put even these few roadless areas at risk from oil and gas development, pipelines, and transmission lines.

If the Forest Service proceeds with adopting a rule, it should ensure that such is at least as protective as the National Roadless Rule by adopting the following recommendations:

Upper tier protections must be expanded and strengthened

Well more than half (around 3 million acres) of Colorado's roadless areas have the important, high-quality values that warrant protection in an 'upper tier.' These are areas known to have particularly high wildlife value, important sources of clean drinking water, and outstanding recreational opportunities. All these lands deserve special protection.

To adequately strengthen the proposed rule, all 'upper tier' lands must have strict No Surface Occupancy stipulations to protect the entire roadless area for any future oil and gas leasing and development. Upper tier lands must not permit the use of 'linear construction zones' to facilitate pipelines, transmission lines, and telecomm facilities.

On all roadless forests priority must be given to the area's roadless characteristics

Even in the case of allowable activities, protection of roadless characteristics needs to be the top consideration. Broad discretion to approve logging projects in the backcountry must be tightened. Other than for existing rights, new exemptions for road building to access yet undeveloped water facilities and 'linear construction zones' should be prohibited on all roadless lands.

Thank you for your consideration of these comments. In closing, I support the protections embodied in the 2001 Roadless Rule. Colorado's roadless national forests deserve at least this level of protection. To craft a rule that is 'on balance' as protective as the 2001 Rule, the upper tier must be expanded significantly and the protections for these lands must be strengthened. Of course all our roadless forests deserve special consideration, and a final rule should make their protection its top priority.

Sincerely,

Karin Teague
Basalt Town Council

Cc: Sect. Thomas Vilsack, USDA
Chief Tom Tidwell, USFS

From: Tom Sykes [tsykes@swhealth.org]
Sent: Wednesday, July 13, 2011 7:21 AM
To: COcomments
Subject: Roadless Rule

Hello, I am a sportsman from Dolores, Co. and I believe the Colorado Roadless Rule should be at least as protective as the Clinton 2001 Rule. The proposed Colorado Roadless Rule definitely falls short of that. All Alternative 2 lands placed in upper tier should remain and all upper tier lands in Alternative 4 should be moved into the preferred Alternative upper tier category. I believe that Linear Construction Zones should be prohibited in upper tier zones. Upper tier areas should also receive NSO protections. The Forest Service should not allow the sale of Common Variety Minerals in upper tier areas. I am also against coal mining and ski resort expansions into Roadless Areas. Thank you for your time and consideration. Tom Sykes PO BOX 1122, Dolores, Co 81323

From: Rick and Cam Hooley [chooley@sprynet.com]
Sent: Tuesday, July 12, 2011 8:42 PM
To: COcomments
Subject: Roadless Rule

As Colorado resident who hunts, fishes and hikes our great backcountry I urge you to create a Colorado Roadless rule that protects our great backcountry/roadless areas greate or equal too the 2001 National Roadless Rule. These areas are vital to provide our wildlife with large areas of roadless undisturbed backcountry and must be protected.

Thank You,
Rick Hooley
Bayfield, CO

From: Ray Samuelson [rdsamuelson22@gmail.com]
Sent: Tuesday, July 12, 2011 4:21 PM
To: COcomments
Subject: The Conservation Alternative

Dear Forest Service,

As a Colorado native I have a very true and personal story about how preserving roadless access benefits both sportsmen and the heritage of our state.

As a young sportsmen, I grew up hunting and fishing in the Troublesome basin. When my father, brother and I initially hunted in the basin it was not a roadless designated area. Each year more and more roads and road spurs were developed by people wanting to penetrate the wilderness further. Both elk hunting and trout fishing continued to deteriorate over time as the vehicle pressure continued to mount. Luckily, through hard work by concerned sportsmen, and insight by the Forest Service the area was designated as non road access only. Today, the Troublesome basin provides some of the best elk hunting and small stream fishing in the state. I continue to hunt and fish in the basin. It holds a special place in my life.

I am very concerned about impact that the USDA Forest Service's proposed Colorado Roadless Rule will have on other pristine areas in Colorado including the Colorado, Arkansas, Cache la Poudre, San Juan, and the Yampa and I fully support Trout Unlimited's position with regards to these areas. While balance between nature and man must be maintained we must preserve these areas for our children and the heritage of our state. We must protect these last, best critical backcountry lands with its highest protections possible.

Specifically please consider the following:

Provide the highest level protection for the last, best habitat for fish and wildlife in Colorado. The "conservation alternative" proposed by the sporting community has identified 2.6 million acres of the 4.2 million acres of Colorado's current roadless areas as needing "upper tier" designation due to their outstanding fish and wildlife values. In the current USDA proposal, only 13% (562K acres of 4.2 million acres) receive high level, upper tier protection.

Prevent damaging development in upper tier areas. Roadless areas identified as last best backcountry lands (upper tier) should be retained for their fish and wildlife values and development should be steered elsewhere. Keep harmful chemicals, produced water, and drilling rigs out of the most valuable fish and wildlife habitat. Energy development is appropriate in some places, but not in others. To provide balance, the Forest Service should require a No Surface Occupancy (NSO) stipulation for oil and gas operations in "upper tier" roadless areas that keeps operators off the surface and allows these landscapes to remain healthy for fish and wildlife.

Eliminate loopholes that threaten native fish. The current proposed rule contains loopholes that allow destruction of native cutthroat trout habitat. Ask the Forest Service to protect cutthroat habitat and require that any projects in roadless areas refrain from altering, damaging, or destroying cutthroat trout populations.

Very truly yours,

Ray Samuelson
704 Golf Club Drive
Castle Rock, CO 80108

From: Glen Edwards [gedwards@mines.edu]
Sent: Wednesday, July 13, 2011 8:15 AM
To: COcomments
Subject: Protecting Colorado roadless areas with Conservation Alternative No. 4

Many thanks go to USDA for all the hard work to protect our precious roadless areas. My sincere hope is that Alternative No.4 will be adopted; a lesser alternative does not protect many important resources.

I am a fourth-generation Coloradan, and have hunted and fished the wild places in our great state for over 60 years. Many of my most treasured places are only protected by Alternative No. 4. For example, in the Rio Grande Forest areas, the upper reaches of Carnero, La Garita, and Embargo Creeks have been hunted and fished by members of my family since the 1930's, and I personally treasure memories of catching native cutthroats in these high meadow streams with my Dad. Only Alternative No. 4 recognizes and protects these treasures.

We have only this opportunity to protect such upper tier reaches for our future generations; if roadless protection is not provided, the pristine environment of such places will disappear forever. Again, thank you for working to preserve those things that make Colorado a great place.

Glen Edwards
Golden, CO

From: Sarah Spitz [sasco1900@gmail.com]
Sent: Wednesday, July 13, 2011 8:11 AM
To: COcomments
Subject: OBJECTION to roads !!!

To Whom this May Concern:

I am writing to say that I hope you will NOT decrease upper-tier protection areas in Colorado. New roads and exploration don't just damage wildlife and recreation values, they also increase chances of potential damage to watersheds through hydrofracking, accidental spills, visual pollution, and other unavoidable perils of expanded roads. Please protect roadless areas.

TAKE A LESSON from the Yellowstone River Spill; we cannot believe that there are sufficient protections to prevent disasters.

--
Sarah Spitz
LA County Master Gardener 2006
Good Food Festival and Conference Garden Committee
Secretary, Seed Library of Los Angeles (SLOLA) www.slola.org
Secretary, Sacred Cow Sanctuary

From: Ian Ramsay [trailblazeidaho@yahoo.com]
Sent: Tuesday, July 12, 2011 1:21 PM
To: COcomments
Subject: Keeping Roadless Areas Roadless

Dear US Forest Service,

I would like to let you know that I am all for keeping roadless areas roadless. It drastically reduces the amount of people in the areas. And keeps those special places special because there aren't a ton of people visiting all the time. I hope that other states partake in this protection. I don't live in Colorado (live in Idaho) but I do like to visit and the next time I do come for a visit or maybe to hunt, fish or hike I don't want to do it in an area that has trash and cans strewn about. I hope that you take my vote and comments into consideration.

Sincerely,
Ian Ramsay

From: Donald Holmstrom [donho2@comcast.net]
Sent: Tuesday, July 12, 2011 7:13 PM
To: COcomments
Subject: Please protect Colorado roadless areas

Colorado has approximately 290,000 elk and nearly 540,000 deer. Our roadless areas currently provide them with abundant secure habitat. Supporting these population numbers would be difficult, if not impossible, without public lands in their present condition. Please preserve our wild backcountry/roadless areas protected with a rule that provides protections greater than or equal to that provided by the 2001 National Roadless Rule.

Thank you for considering my opinions,

Donald S. Holmstrom
6200 Gale Drive
Boulder, CO 80303
303-494-9212

From: zach sargent [zacofish@hotmail.com]
Sent: Tuesday, July 12, 2011 4:43 PM
To: COcomments
Subject: Please Protect Roadless Areas Permanently

My name is Zach Sargent and I live in Colorado, I am a voter and I am hoping that Colorado's roadless forests and other roadless wildlands gain the highest levels of protections possible. I think that considering their environmental, social and economic values as roadless areas that these benefits far outweigh any opposing arguments against such protections. I fish, hunt, hike in these sorts of areas and can't imagine how destructive incursions into the remaining wild areas can be justified considering how much has been lost to motorized uses already. Please work to keep roadless areas roadless permanently.

From: Angela and Hugh Overy [haovery@centurytel.net]
Sent: Tuesday, July 12, 2011 10:22 AM
To: COcomments
Subject: Please support CO Roadless areas.

Many people, including us, think Colorado is the most beautiful state in the union. The large wilderness and roadless areas in Colorado need to be kept that way in perpetuity. We believe these areas should be treasured and expanded. They are becoming increasingly valuable over time. They are the heritage of future generations. We should not be squandering these areas for short-term gain. Once despoiled these wilderness and roadless areas can not be returned to their pristine natural state. We owe it to our planet to preserve them in their entirety.

sincerely, Dr. Hugh and Angela Overy
Edwards, Colorado.

From: Brent Von Schaumburg [peaksnstreams@gmail.com]
Sent: Tuesday, July 12, 2011 8:12 PM
To: COcomments
Subject: Preserve the Wilderness!

Good evening,

My name is Brent Von Schaumburg and I'm a native Coloradan. I'm now 19 years old, and have been fishing, hunting and generally enjoying the wilderness areas of Colorado for most of that time. These are life long sports that give me the greatest fulfilment in my life. If we forget the necessary experiences these places of primal experience provide, than we forget our connection to this world. These sports deserve a place in the human spirit for a long time and the only way to do this is by preserving Colorado's unique wilderness areas.

Thank you for your time,

Brent