



United Four Wheel Drive Associations, Inc.

... An International Organization

www.ufwda.org

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The Keystone Center
ATTN: Roadless Areas Review
1628 Sts. John Road
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Dear Task Force members,

I am writing on behalf of United Four Wheel Drive Associations (UFWDA) regarding your recommendations to Governor Owens concerning how Roadless Areas within National Forests in Colorado are managed by the U.S. Forest Service, particularly including what uses if any will be allowed in these areas.

UFWDA is an international organization of four wheel drive motor vehicle enthusiasts, four wheel drive clubs, organizations, and businesses dedicated to the conservation and utilization of public lands, including lands open to the public in Colorado. Four wheel drive motor vehicle use involves travel at a very low rate of speed, usually less than 3 miles per hour, on roads otherwise not suitable for passenger car travel. Our members enjoy activities such as trail riding in National Forests, travel on woods roads on state managed lands, as well as other activities such as bird watching, wildlife study, mushroom picking, and geocaching to name a few.

As you know, there are 11 National Forests in Colorado, managed through 7 offices with 8 separate Land and Resource Management Plans (forest plans). Each forest and plan has issues unique unto themselves. In fact, the Pike & San Isabel National Forests are considered "the most diverse of all national forests" according to the U.S. Forest Service.¹ Each of the 8 forest plans were conducted at various times over the past three decades pursuant to the National Environmental Policy Act (NEPA) with public involvement and extensive environmental, scientific, social, and economic study.

Likewise, each of the 8 forest plans addressed Roadless Area management pursuant to Forest Service planning regulations requiring these areas be evaluated

¹ www.fs.fed.us/r2/psicc cover page

and considered for recommendation as potential wilderness areas.² These evaluations included consideration of the values of the areas as wilderness and the feasibility of management of the areas as wilderness, among other things.

Every evaluation and consideration afforded Roadless Areas, and the genesis for their evaluation, is solely for the purpose of analyzing their suitability for wilderness designation, a designation entrusted exclusively within the purview of Congress. “The key elements analyzed [are the] capability to meet the intent of the *Wilderness Act of 1964* and the availability, suitability and manageability of these areas as Wilderness.”³ The evaluation and consideration for recommendation as potential wilderness culminates in a decision which (a) recommends the area as suitable for wilderness, (b) recommends management appropriate to protect the wilderness characteristics of the area, or (c) recommends management for the area using site-specific analysis on projects in areas found to be non-wild and/or developed and thus not suitable for wilderness.

UFWDA asks that the committee make a recommendation to Governor Owens to allow the management decisions made pursuant to current forest plans to continue. No new rulemaking is needed in Colorado to protect our unroaded areas of pristine beauty. They are protected extensively by forest plans reached through massive public involvement and with the expenditure of great amounts of money.

For example:

Arapaho-Roosevelt National Forest – contains 330,000+ acres of Roadless Areas. 71% of these Roadless Areas (234,796 acres) are protected from entry which includes a prohibition of road construction. 29% of these Roadless Areas (95,524 acres) are open for entry, but only upon site-specific analysis that such entry does not affect the roadless nature of these areas. Note that within the 29% of areas open to entry there already exist conditions that render these areas “non-wild”, “developed”, and thus not suitable for wilderness designation by Congress.⁴

Medicine Bow National Forest – contains 319,725 acres of Roadless Areas. 95% of these Roadless Areas (302,650 acres) are protected from entry which includes a prohibition of road construction. 5% of these Roadless Areas (17,075 acres) are open for entry, but only upon site-specific analysis that such entry does not affect the roadless nature of these areas. Note that within the 5% of areas open to entry there

² 36 C.F.R. 219.17, from 1982 through 2001. The White River National Forest plan was issued in 2002 and the Medicine Bow National Forest plan was issued in 2003. Although the Planning Regulations were changed effective 2001, all 8 forest conducted planning pursuant to the 1982 regulations.

³ Final Environmental Impact Statement to accompany the 1997 Revised Land and Resource Management Plan, Arapaho and Roosevelt National Forests and Pawnee National Grassland, USDA Forest Service, Rocky Mountain Region, 1997, page Chapter 1 * 7.

⁴ Arapaho and Roosevelt National Forests Final Environmental Impact Statement for the 1997 Revision of the Land and Resource Management Plan, Chapter 3 *374.

already exist conditions that render these areas “non-wild”, “developed”, and thus not suitable for wilderness designation by Congress.⁵

Routt National Forest – contains 340,990 acres of Roadless Areas suitable for wilderness designation by Congress. 67% of these Roadless Areas (269,518 acres) are protected from entry which includes a prohibition of road construction. 33% of these Roadless Areas (71,472 acres) are open for entry, but only upon site-specific analysis that such entry does not affect the roadless nature of these areas. Furthermore, within the 33% of Roadless Areas open for entry there exist motorized trails or other imprints of man that would render these areas unsuitable under the 1964 Wilderness Act if not under Forest Service criteria which studies an area’s suitability despite the presence of “motorized trails, fences, outfitter camps, and historical logging activities”.⁶

These are but three examples of the information contained within the 8 forest plans in the National Forests in Colorado.

In addition to the discussion above, it is very important to understand there is minimal risk of development of roadless areas in Colorado.

- 2001 Roadless Area Conservation Rule estimated that 1,076 miles of roads would be constructed in roadless areas nationally over the next 10 years.⁷
- Roadless Areas across all National Forests in Colorado total 4.4 million acres.⁸
- Roadless Area across all National Forests in Colorado represents 7.6% of all Roadless Areas.⁹
- Statistically, less than 9 miles of road construction will occur in Colorado roadless areas per year.¹⁰ This equates to less than 1 mile of road per forest per year in Colorado.¹¹

Despite inaccurate claims that Colorado could lose its last and best pristine areas to development, additional rulemaking is not needed at this time to evaluate the effects of less than 1 mile of road construction per year on each of Colorado’s 11 forests.

⁵ Medicine Bow National Forest Final Environmental Impact Statement and Revised Land and Resource Management Plan, Record of Decision, December 2003, pages 37-38.

⁶ Final Environmental Impact Statement for the Revised Land and Resource Management Plan, Routt National Forest, February 1998, page 3-179 ff, tables 3-64, 3-68 and 3-69.

⁷ Roadless Area Conservation Rulemaking, Draft Environmental Impact Statement, (2000), page S-19. 806 miles timber related + 638 miles non-timber related – 368 miles construction for public safety = 1,076 miles.

⁸ <http://roadless.fs.fed.us/states/co/state3.shtml>

⁹ Colorado roadless areas in the amount of 4,433,000 acres divided by total forest system roadless areas in the amount of 58,500,000 acres = 7.57% rounded to 7.6% of roadless areas are located in Colorado.

¹⁰ 1,076 miles of road construction estimated by the U.S. Forest Service nationally to occur over a 10 year period. 7.57% (representing Colorado’s roadless areas) of 1,076 miles of roads = 9 miles.

¹¹ 9 miles of possible road construction in roadless areas in Colorado divided by 11 national forests = .81 mile

UFWDA supports the protection and designation of wilderness in areas where wilderness characteristics exist. Our members work to promote proper user ethics to prevent degradation of our countries last unspoiled primitive areas where the presence of man is still unnoticeable. However, those pristine, primitive, and untouched areas are already being managed so as to protect their wilderness quality. The existing forest plans currently prohibit entry into these wonderful areas.

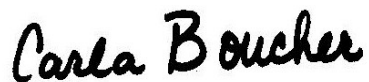
Many members of the public across a broad spectrum of interests have provided comments thus far to the task force indicating that additional road building in roadless areas should be prohibited. In general UFWDA is not disagreeing with the premise that areas suitable for wilderness designation be protected. To that end, the lands that road building remains a question on is limited to those lands which the U.S. Forest Service has already found to be roaded, nonwild, or developed, thus making them unsuitable for wilderness designation.

Finally, UFWDA is extremely concerned about any rulemaking that prohibits road reconstruction, similar to those portions of the 2001 Roadless Area Conservation rulemaking prohibiting road reconstruction. It is ironic that the public finds itself in a discussion about whether reconstruction of a road is appropriate in what is purported to be a road-less area or unroaded area. Please be mindful that road reconstruction and/or extensive maintenance to a road should not be a part of this Roadless Area Conservation debate. Areas which have the presence of a road should not be under consideration for conservation beyond whatever management guidelines the local forest office has set in place through the forest plan.

It is the recommendation of UFWDA that the task force advise Governor Owens to refrain from issuing a petition for rulemaking to the U.S. Department of Agriculture pursuant to 36 C.F.R. 294. Rather, we recommend that Roadless Area conservation be carried out through the forest plans currently in place.

Thank you for your time and for your consideration of our comments. We congratulate you on your work and your dedication to public involvement on the issue of Roadless Area conservation.

Very truly yours,

A handwritten signature in black ink that reads "Carla Boucher". The signature is written in a cursive, slightly slanted style.

Carla Boucher, Attorney