

**Colorado Wild - High Country Citizens' Alliance - Wilderness Workshop -  
Western Slope Environmental Resource Council - The Wilderness Society -  
Colorado Mountain Club - Western Colorado Congress -  
Natural Resources Defense Council**

June 11, 2009

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

Dear Secretary Vilsack:

The undersigned groups wish to express our thanks for your recent Interim Directive pertaining to management of roadless National Forest lands. This is an important first step toward restoring strong national protections for these invaluable National Forest resources. We look forward to working with the USDA in the months and years ahead to secure meaningful and long-lasting protections for roadless forests nationwide.

Given your recent Directive, we wanted to follow up on our letter of April 22 and ask you to direct the U.S. Forest Service to forgo a final decision on the current rulemaking underway for management of inventoried roadless areas (IRAs) in Colorado until the Obama Administration has clarified its direction for roadless area management nationwide, a process we understand to be currently underway. While we will continue to work with the State of Colorado and the USFS Regional Office to improve the proposed Colorado Rule, we believe it is imperative that it not be adopted until it is clear that it is consistent with President Obama's commitment to support and defend the 2001 Roadless Area Conservation Rule.

We are strongly opposed to the proposed Colorado Rule, as drafted. The proposal fails to provide the strong protections which Colorado citizens and millions of Americans across the country have requested time and time again. Despite some improvements, the Colorado Rule falls well short of the protections provided by the 2001 Roadless Area Conservation Rule, popularly known as the Roadless Rule. The proposed Colorado Rule is a glaring example of why the 2001 Rule – a *national* rule providing consistent and forward-looking protection for these *national* lands – was developed in the first place, and should be fully reinstated and defended in court.

The proposed Colorado Rule does not protect Colorado's National Forest roadless areas from commercial logging or from roadbuilding associated with new coal or oil and gas leasing or water and utility infrastructure development, despite the efforts of many individuals and organizations to work with the Colorado Department of Natural Resources and the U.S. Forest Service Regional Office. Indeed, this proposed Rule is really a *Road* Rule for Colorado, not a *roadless* rule. The proposed rule creates road building loopholes that would jeopardize valuable wildlife habitat, clean water sources, and popular recreation areas. In other words, this proposed Colorado Rule would open to industrial development the very things that make Colorado, and all roadless areas nationwide, precious to the American people.

We want to specifically draw your attention to four components of the proposed Colorado Rule that we oppose, and that illustrate how the proposed Rule is significantly weaker than the national Roadless Rule that we support.

Logging for Community Wildfire Protection:

While we strongly support appropriate science-based fuels reduction to reduce the threat to people and property, the proposed Colorado Rule instead allows virtually unlimited logging and road building under the guise of fire risk reduction far from (up to 1½ miles from) homes and infrastructure. Additionally, a separate loophole could result in still further logging and road building even farther into the backcountry. These overly broad exemptions could allow more than 660,000 acres of roadless areas to be roaded and logged statewide. Research conducted by the Forest Service and independent scientists suggests that only a small portion of this area needs treatment to provide sufficient protection for adjacent communities. The Colorado Rule unnecessarily places more than a half million acres of roadless forests under threat of industrial logging and road construction in areas where it could increase fire risk to communities, pollute water sources, and destroy wildlife habitat, in addition to diverting scarce resources.

Coal Mining in the Currant Creek Roadless Area: As described in correspondence dated June 5, 2009, the proposed Colorado Rule would create a special exemption for coal mining and road construction on specific lands on the Grand Mesa, Uncompahgre, and Gunnison National Forests (GMUG), including the Currant Creek roadless area. The Currant Creek area is distant from existing coal leases and for the past sixteen years has been recognized by the U.S. Forest Service to be a high-quality roadless area deserving protection from mineral development.

Despite the recommendation of local Forest Service staff on the GMUG National Forest, this ecologically important and undisturbed area has been sacrificed as a special hand-out to industry under the proposed Colorado rule. This exception is inappropriate and is an artifact of the Bush Administration's improper manipulation of this process. Consistent with the local district's recommendation, the area needs full roadless protection.

Oil and Gas Leases: Also of particular concern are oil and gas "gap" leases issued after the 2001 National Roadless Rule became effective. The proposed Colorado Rule would allow roadbuilding associated with these leases – roughly 100 in number and impacting tens of thousands of acres – and would lead to an intensive spider web of roadbuilding in the middle of some of Colorado's most prized backcountry, like the Springhouse Park and Thompson Creek Roadless Areas. Such activity would not have been permitted under the 2001 Rule. This exception undermines the years of hard work that led to the carefully crafted and balanced approach of the national Roadless Rule.

Stipulations prohibiting roads should be applied to all oil & gas leases in roadless areas issued since January 2001, or these leases should be retracted, allowed to expire undeveloped, or otherwise removed before any Colorado-specific rule proceeds.

Water and Utility Infrastructure: One final example of the significant inconsistency between the proposed Colorado Rule and the 2001 Rule includes the allowance of road-building for water and utility infrastructure to include all *future* water and utility proposals, thereby placing Colorado's roadless areas indefinitely at risk of development of roads and infrastructure associated with water and utility pipelines, electrical transmission lines, and even reservoirs.

Finalizing the proposed Colorado Rule at this time is directly in conflict with your recent Interim Directive and with the broad national support for the Roadless Rule. We urge you to forgo any future action on the proposed Colorado Rule until a clear national direction for Roadless Area Management is articulated by USDA and the Obama Administration. Colorado's roadless areas should receive the same strong protections afforded nationwide.

We also understand that the administration is considering potential nominees for Undersecretary of Agriculture for Environment and Natural Resources, a position critical to the management of the country's 193 million acres of National Forests and to the future of roadless areas in particular. It is essential that the person chosen to fill this critical post has a strong commitment to protecting these national treasures and shares President Obama's strong support for the 2001 Roadless Rule as a national policy to equally protect all National Forest roadless areas.

We look forward to working with you and President Obama to ensure that all roadless areas in our National Forests receive the strong nationwide protections that they deserve.

Sincerely,

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