

INTRODUCTION

An Open Process

In general, we commend the Forest Service for embarking on an open process for its revision of the White River Forest Plan. The Forest has held dozens of meetings, including stakeholder meetings and open houses, and has extended a 9-month comment period to permit thousands of members of the public to participate in a meaningful manner. The staff of the White River National Forest (NF) has spent thousands of hours working with and responding to the public. Anyone who criticizes this process as other than open and inclusive has not been paying attention.

Alternative D – A Few Steps in the Right Direction

On the whole, we would support several of the major decisions and emphases of Alternative D, the Forest Service's preferred alternative. Specifically, we support the Forest Service's proposal to:

- manage motorized and mechanized recreation to eliminate illegal, redundant, and/or environmentally harmful routes and to limit motorized and mechanized summer travel to designated routes. ORVs would still have access to approximately 1,300 miles of travelways, enough to stretch from Denver to Washington, D.C. Snowmobiles would still have access to more than 40 percent of the forest outside of designated Wilderness.
- limit ski area growth to within existing permit boundaries. This would still allow construction of new lifts at many ski areas.
- use its lawful, federal authority to protect bypass flows to keep water in streams to benefit wildlife and recreationists on the Forest.

These approaches recognize: (1) the reality of increased recreation pressure and damage to Forest resources that has occurred in the last 15 years; and (2) the public's changing views on the importance of our National Forest System, from one which emphasized resource extraction to one that emphasizes the long term sustainability of the Forests' biological and physical resources.

Careful scrutiny as that which is contained within these comments shows that Alternative D more closely reflects the premise of Alternative C, acknowledging "the need to provide a wide range of recreational opportunities to serve Forest customers and local communities while maintaining Forest ecosystems." Yet the Draft EIS summary states, at 14, that Alternative D "addresses the idea that a *higher* priority be given to physical and biological resources than to human uses of the forest" (emphasis added). Forest management under Alternative D would *not* place a higher priority to physical and biological resources than to human uses of the forest. Unfortunately, opponents of wildlife preservation and responsible recreation have seized upon the premise of Alternative D in their bid to undermine support for the Forest Service's own preferred alternative.

Alternative I – A More Balanced Approach

Alternative D does not go far enough towards adequately protecting the wildlands and roadless areas on the White River NF. Only Alternative I truly places a **higher** priority to physical and biological resources than to human uses of the forest. Given the last century and a half's tremendous use – and abuse – of forest resources for human benefit, preservation of remaining native biodiversity now demands that human use of the forest for resource extraction and recreation opportunities be permitted only within what the forest can demonstrably accommodate. It is for this reason that we support Alternative I with minor modifications, and we ask that the Forest Plan Revision contain the following:

- Recommendations to protect ALL 300,000 eligible acres originally identified in the Citizen's Management Alternative for wilderness protection. The Forest Plan Revision must protect as recommended wilderness (Prescription 1.2) the roadless areas around the Flat Tops, the Pagoda Peak complex, Spine of the Rockies Corridor, Elk Mountains to Grand Mesa Corridor, Basalt Mountain/Red Table and Deep Creek.
- Recommendations to protect all roadless areas from logging, road building, development, and motorized recreation.
- Elimination of superfluous ski area expansion management prescriptions and prohibition on construction of aerial tramways. Expansions cause sprawl and congestion in mountain towns, destroy wildlife habitat, and are not needed to provide a quality recreation experience for Forest visitors.
- Orders to close and restore 500+ miles of illegally-created, environmentally harmful, or redundant roads and motorized trails. Reasonable limits on off-road vehicles and snowmobiles would protect wildlife and reduce conflicts for backcountry hikers and skiers.
- Protections for old growth "ancient forests" and mandates that will permit natural processes such as fire to occur, particularly away from human settlement.
- Recommendations for designation of all potential "wild and scenic" rivers, including Deep Creek.

Alternative I promotes reasonable management of recreation, with more than 2,500 miles of roads and trail open to mountain bikes, 1,500 miles of roads and trails open to dirt bikes and other off-road vehicles, and more than 500 miles of trails open to snowmobiles. These tremendous recreation opportunities will be available while providing greater protection for wildlife.

Alternative I will protect our wilderness future, not locking up lands but freeing them from the pressure for development and destruction. Sprawl is eating up Colorado's open lands – including here in the High Country – at 90,000 acres per year. Our last potential wilderness areas are at stake in this plan. The Conservation Alternative would do what surveys show 2/3rds of Coloradoans want – protect the vast majority of potential wilderness lands.

Alternative I protects the quality of life in our mountain towns. The White River plays many roles in the High Country: a watershed, a source of beauty and recreation, and an important generator of economic wealth. The Conservation Alternative recognizes this and protects this treasured resource for a generation. No one comes to Colorado to see clear cuts, trashed meadows, or polluted streams. The Conservation Alternative protects the values upon which the High Country's economy and quality of life rely.

Major Concerns with the Draft Environmental Impact Statement and Proposed Plan

The White River NF Forest Plan Revision and Environmental Impact Statement (EIS) have the potential to be precedent-setting documents. In this the second round of planning under the National Forest Management Act, the White River NF Forest Plan Revision and Final EIS will be the first such documents to be adopted under the "new management" of Chief Michael Dombeck and Regional Forester Lyle Laverty. The Forest Service in the Rocky Mountain Region has a special duty to set a high standard in protecting forest, habitat, wildlife, recreational, and other resources for decades to come through prudent stewardship and ecosystem management, and in obeying the laws that govern management of public lands.

Unfortunately, in several critical areas the White River NF failed to rise to the occasion. The Forest Plan Revision represented a golden opportunity for the Forest Service to collect, analyze and make decisions based upon badly-needed data on habitat, wildlife species, recreational uses, and other values. In several important areas, the White River NF has not yet seized this opportunity. The Forest Plan Revision, among other things:

- fails to properly determine whether roadless areas merited inclusion in the Wilderness Preservation System;
- fails to properly ensure that viable populations of declining wildlife species – including sensitive, threatened, and endangered species – will be maintained;
- fails to accurately analyze the economic, recreational, air quality, and virtually every other impact of ski-based resorts; and
- fails to properly evaluate the economic impact of the proposed Plan

As is set forth in more detail below, we urge the Forest Service to address and correct these and other deficiencies in any subsequently-prepared NEPA document and plan.

On behalf of the White River Conservation Coalition and the more than two dozen groups listed above, we thank you for this opportunity to comment, and commend for your consideration the attached comments.

Sincerely,

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On behalf of the White River Conservation Coalition, et al.