REPRESENTATIVE SCOTT MCINNIS' "BLENDED ALTERNATIVE"

Writers of Representative Scott McInnis' Blended Plan propose a management scheme for the White River National Forest (NF) that retreats to an earlier way of thinking about human uses of forests. It also blatantly favors the downhill ski and timber industries. It exhibits almost no sympathy for, or even knowledge of, biological diversity, TES (threatened, endangered, sensitive) wildlife, or the desires of many humans to see whatever wildness remains on the White River NF preserved. It attempts to represent a wholly one-sided proposal as a "compromise" between recreation and wildlife preservation. The details reveal nothing of the sort. Quite to the contrary, careful analysis of Rep. McInnis' "Blended Alternative" reveals it as little more than an industry wish list rather than a "balanced, compromise" plan as presented.

Failure to Undertake a Truly Public Process

We take issue not only with the content of Rep. McInnis' alternative, but significantly with the process surrounding the development and its public release. Rep. McInnis' alternative was released for public review on Monday, May 8. Leaving a mere one day for public review of his alternative, Rep. McInnis failed to provide the public with an opportunity to review his proposal, in contrast with the extended public comment process that has characterized the White River NF plan revision. His proposal was largely prepared behind closed doors, with significant industry – but little public- input. All other Plan alternatives, including the Forest Service's proposed plan (Alternative D) and the conservationist's proposal (Alternative I) were prepared after an exhaustive public process that included dozens of open houses, public meetings, and hundreds of hours of working sessions with White River NF staff. All of the Alternatives have been available for public review and comment for almost 9 months.

Of utmost import, Rep. McInnis and his staff sought endorsements from county commissioners, town councils, and other legislative bodies, even though they failed to divulge the details of his proposal. Rep. McInnis and his staff were criticized for claiming to have sought and incorporated Pitkin county input when they did not. (Exhibit MC-1: Aspen Times, 4/19/00, "County Rebuts McInnis claim on Forest Plan") Further, Rep. McInnis claimed to have consulted various diverse organizations. Yet every organization or affiliated individual that signed onto a statement of principles – espousing the need for placing biodiversity preservation above the needs of recreation – was apparently not consulted in the Plan's preparation. (Exhibit MC-2: Conservation / Non-motorized Recreation Group Joint Statement of Principles Regarding the White River NF plan revision.) During Congress' legislative session break in April when Rep. McInnis and his staff began seeking such endorsements, public opposition to his "balanced" proposal became quite apparent. (Exhibit MC-3: Various articles discussing Rep. McInnis soliciting endorsements for his plan). Notably, several legislative bodies failed to endorse the McInnis plan.

Wilderness

Conservationists have endorsed protecting as recommended wilderness all 300,00 acres of roadless areas found eligible for wilderness by the Forest Service. Such protection would

maintain forested connections between existing wilderness areas, would provide greater protection for core wildlife habitat areas, and would provide for a greater diversity of protected ecosystems. Particularly protecting lower elevation areas would provide habitat for a greater diversity and abundance of wildlife.

The Forest Service's proposed plan, Alternative D, would protect only 47,000 acres of recommended wilderness.

Rep. McInnis' "Blended" proposal protects even less. His proposal for "recommended wilderness" for the White River Plan would protect among the least area of any alternative considered by the Forest Service, and thus ignores the need to protect lower elevation lands as wilderness, and ignores Colorado survey data showing broad support for protecting ALL roadless areas.

McInnis' proposal recommends less wilderness than almost any other alternative. According to Rep. McInnis' Blended Alternative, the total acreage recommended for "proposed wilderness" is 16,022 acres.[1] That's about 5% of all eligible roadless lands remaining on the Forest according to the Forest Service's inventory; 17% of the amount recommended in Alternative C; and 35% of the amount recommended in Alternative D (Draft EIS at 3-385). The ***only*** alternatives that recommend less wilderness are the "no action" Alternative (Alt. B), and the "maximum logging" alternative (Alt. F).

McInnis' proposal means most roadless lands would lose wilderness character. Rep. McInnis' proposal would leave up to 95% of roadless lands open to logging, mining, road construction, new Off-road Vehicle (ORV) trails, and other non-conforming uses. His proposal also could permit logging and new road construction in roadless areas[2], and would likely result in more than 200,000 acres of roadless lands losing their wilderness character over the life of the Forest Plan.[3]

Rep. McInnis' proposal would protect no new free-standing areas. Unlike Alternatives C, D and I, the McInnis Plan proposes no new "free standing" areas, but merely tiny additions to existing wilderness lands. Free-standing areas that other alternatives propose for recommended wilderness include the Red Table Mountain/Basalt Mountain area, Sloan Peak, and Assignation Ridge/Thompson Creek.

McInnis' proposal would protect only tiny areas adjacent to existing wilderness areas. The largest area recommended by Rep. McInnis is North Independent A (4,548 acres). Rep. McInnis would recommend no new wilderness adjacent to the Flat Tops Wilderness, despite the fact that the Forest Service identified 74,100 roadless acres near this flagship area.

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[1] Blended Alternative, D-1. Areas recommended include #s 19, 20, 21b, 21c, 57, 75, 77, 84. See also Draft EIS at 3-382.

[2] Blended Alternative, F-26.

[3] See Exhibit MC-4, McInnis Plan Treatment of Priority Roadless Areas Recommended for Wilderness by the White River Conservation Coalition, in which a careful analysis of management prescriptions recommended in the McInnis Plan demonstrates the likely destruction of wilderness values in these areas.

McInnis' proposal effectively recommends protection for only ***five*** roadless areas instead of eight. The number of roadless areas recommended for wilderness in the McInnis plan is inflated. Hunter and Independence roadless areas near Aspen are effectively one roadless area, meeting on top of the Smuggler Mountain ridge. They were separated in the Forest Service inventory for administrative purposes. The two Black Lakes areas are separated by a road. Ute Pass and Acorn Creek are separated by about 100 feet because of where the Forest Service arbitrarily chose to put the roadless area boundary. Thus, six of the McInnis roadless areas recommended for Wilderness are really only three on the ground. Furthermore, the remaining two are just more of the same rock and ice with little biological value, similar to existing wilderness on the Forest - Treasure Mt. is part of two alpine cirques and much of No Name is above treeline.

McInnis' proposal ignores the ecological need for more wilderness. The Forest Service concluded that the "greatest documented need for new wilderness is based on the biological [ecological] need evaluation." Id. at C-4. Rep. McInnis' proposal would recommend wilderness protection for ***none*** of the 13 areas for which the Forest Service identified "ecological need" as one of the "values ranked highly" (Draft EIS Appendix C, at C-5, Table C-1). The Forest Service explains that the wilderness system on the White River – and throughout Colorado – currently protects mainly high alpine ecosystems (so-called "rock and ice" areas), while lower elevation ecosystems which provide for greater diversity and abundance of wildlife remain largely unprotected as wilderness (Id. at C-3). Rep. McInnis' proposal would recommend no additional wilderness to address this need.

McInnis' proposal ignores public support for more wilderness. Forest Service surveys show broad support for protecting all roadless areas as potential wilderness. Forest Service surveys in the Draft EIS, at 3-472, conclude that "69% of respondents agree (20% disagree, 10% neutral) that 'all roadless areas should be conserved for possible future designation as wilderness areas.'" Surveys also show that two-thirds of respondents agree that "areas of national forest with no roads should be kept roadless." Id. Rep. McInnis' proposal ignores this broad public support.

Downhill Ski Areas

The Blended Alternative appears to be based solely on the desires of current ski area operators rather than on legitimate needs for public recreation. Tellingly, Richard Woodrow, the former White River NF Supervisor contracted by Rep. McInnis to prepare the new alternative, inadvertently revealed[4] that a ski connection from Vail to Minturn was not in the latest McInnis plan draft because "Vail Associates had not requested it."

The McInnis plan could permit A-Basin, Breckenridge, and Keystone ski resorts to approximately double their developed acreage. Huge expansions would also be possible at Beaver Creek (45% increase), and Copper Mountain (26% increase, yet coupled with expansion terrain already within their permit boundary could also more than double in size). A new area larger than Breckenridge's currently developed acreage could be built south of Rifle in order to provide a windfall for sprawl-inducing real estate development. All told, the acreage open to ski resorts for development would total over 58,000 acres,[5] even more than Alternative C (57,480

[4] Public meeting held by Rep. McInnis, Vail Town Council Chambers, April 17, 2000.
[5] Blended Alternative, D-3.

acres),[6] and 30+ % more than Alternative D,[7] which would limit ski areas to their currently permitted boundaries.

The ski permit area prescription allocation for the Rifle Ski Area is carried over from the 1984 Plan into the McInnis Plan "to compliment a proposal on private land". However, the White River NF plan revision Draft Environmental Impact Statement (EIS) notes that a site-specific EIS was done in 1983 for this proposal, but:

> *"The operator failed to obtain financing needed to complete the initial phases of development. The cost of developing a new stand-alone ski-based resort at Rifle remains as a key constraint for potential investors."*[8]

Rifle would not be near an airport capable of handling large jets, nor would it be attractive for day skiers from Colorado's Front Range. It is also likely to be lower in snow quantity and quality than resorts like Vail and those in Summit County. In short, it does not seem likely that a resort near Rifle could be economically viable. Thus, it is not surprising that there seems to be no proponents for this project, yet the McInnis plan still retains the dream of someday building it.

Proponents of the Blended Alternative insist that the plan only seeks zoning for additional ski area expansions. Once a region of forest is placed under a ski area expansion management prescription, however, many factors practically guarantee that those sections of the forest will be developed for downhill skiing were the ski area to request it. As ski area managers understand all too well, the cost associated with environmental analyses keeps rising, in no small part abetted by conservation organizations and a public demanding environmental protection. Vail's Category III EIS for instance, took over 4 years, several revisions, and ended up in Federal District court nonetheless… a very expensive endeavor. With expansive human and capital resources invested in an expansion proposal, proponents both within the Forest Service and the ski company are unlikely to simply drop a proposal they have spent years analyzing, regardless of the impacts.[9]

The management prescriptions for existing ski areas would zone the forest for dramatic expansions under the McInnis Plan[10]. For example, Keystone Resort[11] could add another 4,000 acres. Depending on where this expansion was allowed, it could swallow the peaceful little

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[6] White River NF Plan Revision Draft EIS at 3-330.
[7] White River NF Plan Revision Draft EIS at 3-330.
[8] White River NF Plan Revision Draft EIS at 3-314.
[9] See Ski Area Comments, at S-3, for additional discussion and documentation.
[10] The Forest Service's preferred alternative D would still permit significant expansion acreage within current ski area special use permit boundaries. In particular, Keystone can expand into Jones Gulch to their east (they have a proposal now under Forest Service study for three lifts and hundreds of acres there), on the West Ridge to the southwest, and increasing capacity on the North Peak and Outback Mountains. Breckenridge can expand onto Peak 7, where a Forest Service approved high speed quad that would access over 300 acres of Vail Resorts' owned private land at the base is now on hold given connected real estate development concerns. Copper Mountain currently has an expansion proposal underway on Tucker Mountain, and still has tremendous acreage (at least three more lifts and over one thousand acres) for expansion in to their west and southeast. Ski Sunlight contains enough ski area management prescribed land within their permit boundary to more than quadruple in size, becoming the size of Copper Mountain. Additional documentation is provided in our Ski Area Comments.
[11] Keystone expanded greatly in the 1980s and 1990s.

Town of Montezuma, which currently is a major area for cross-country skiing[12]. Breckenridge would be allowed to more than double its already considerable current size. It now takes up four mountains [TenMile Range peaks 7-10]. Any additional expansion would probably require another base area, with all of its impacts.

Ski area expansion boosters further declare that the McInnis plan ***reduces*** land allocations for developed ski areas. However, the current forest plan was prepared during an economic slump; the White River NF under Mr. Woodrow's tenure sought to ameliorate difficult economic conditions by zoning the forest for tremendous and now unrealistic expansion potential. Most of these areas were never seriously considered for ski areas or generated tremendous public opposition, including Georgia Pass, Brewery Hill, Adam's Rib, Rifle, and Coal Basin.

Finally, the McInnis Plan promotes specious conclusions in the Draft EIS that paint the proposal to limit ski areas to their current permit boundaries as damaging to the ski industry, local economies, the skiing public, and even the environment. As discussed in our Ski Area Comments, the Ski-based resort section of the Draft EIS draws conclusions based little on fact and detailed analysis on practically every issue it discusses and purports to analyze. Yet its specious conclusions are being carelessly promoted by those within the ski industry that still seek to further expand. In unabashedly promoting the ski industry's request for ever more terrain, the McInnis plan ignores that most expansions today are driven by real estate development profiteering rather than genuine public recreation needs.[13]

Timber Program

As others have pointed out, the McInnis plan seems generally geared toward meeting industry's expectations. The McInnis Plan insists that the allowable sale quantity of timber be at least 20 million board feet (MMBF), with an additional 20 MMBF for "a wood products sale program".[14] Yet the White River NF's cut in recent years is much less than that. In fiscal year 1998, 9.1 MMBF were cut and 9.9 were sold. The figures for the most recently completed fiscal year, 1999, are 11.3 and 10.5, respectively[15]. ***Even though this level of logging generates tremendous public controversy, Rep. McInnis' plan proposes to more than quadruple current levels of logging.***

The McInnis Plan also concerns itself with logging mills in far-away locations such as Olathe, CO and Saratoga, WY, closing if insufficient timber is made available for logging on the White River NF.[16] The Saratoga mill takes timber from at least three other national forests that are much closer to it than the White River. It is not dependent on the White River, which probably accounts for a relatively minor portion of its raw material.

[12] With at least five major trailheads in the vicinity, Montezuma is a major center for Front Range and local nordic skiers and snowshoers. Its loss would be devastating.
[13] See the Ski Area Comments, page S-27, for additional discussion.
[14] Blended Alternative, F-26.
[15] It is important to note that these figures include all timber, not just what is chargeable to the allowable sale quantity.
[16] Blended Alternative, F-27.

Similarly, the Olathe mill gets some of its timber from Utah. Its cutting of aspen in western Colorado, on both the GMUG and the White River NF's, has been quite controversial[17]. ***With its record of air quality and safety violations, the Forest Service should NOT be eager to support this mill. Yet the McInnis plan will increase logging to bolster a logging mill that continuously violates air quality and labor safety standards***. Because of the severity and persistence of these violations and other problems, the Chief of the Forest Service, in approximately 1996, seriously considered debarring Louisiana-Pacific from getting any federal timber for five years.

The McInnis Plan insists that a large timber program would be more cost efficient. It even goes so far as to state that the low sales and wood products levels proposed under all the alternatives make an above-cost sale program under any of them unlikely, and that roadless areas must be logged.[18] This ignores the fact that White River NF's timber program was below cost every year but two from 1988-1997.[19] Roadless area timber sales in particular are very costly because roads must be constructed, often for many miles in very rough terrain[20].

It also ignores potential costs in terms of environmental impacts from the loss of wild values in roadless areas, compacted soils, displacement and harassment of wildlife, reduction in water quality, etc, as well as the financial costs of such a huge program. The McInnis Plan also seems stunningly unaware of the intense public opposition to roadless area timber sales.

The McInnis Plan decries the fact that Colorado is a net importer of wood.[21] Given the slow growth of our forests, rugged access, the need for relatively intact forests for recreation and wildlife, and the high demand for wood caused by the current building boom, it is hardly a surprise that Colorado does not produce all the wood it consumes. It cannot reasonably be expected to, given these conditions. McInnis Plan ignores possible substitutes for wood, especially for paper[22], which constitutes up to 50% of the demand for wood in the United States. To a much lesser extent, some alternative materials could possibly be used in some instances for building. In any case, recycling of wood can be increased to reduce the cutting of forests needed to meet wood needs.

<u>Old Forests and Old Growth</u>

In its discussion of forest vegetation, the McInnis Plan ignores considerations of biological diversity, specifically, the need for older forests for wildlife and the role decaying vegetation plays in forming new soil, etc. As Forest Supervisor, Mr. Woodrow advocated ideas similar to

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[17] Wildlife officers in the Meeker area are worried that aspen cutting is forcing too many elk down to private land where they cannot be hunting. They are also worried about increasing motor vehicle abuse on and off roads constructed for aspen sales adversely affecting wildlife.

[18] McInnis recommends "not constrain[ing] the ability to accomplish desired vegetation changes by constraining the building of roads into roadless areas where the work is needed". Blended Alternative, F-26.

[19] Draft EIS at 4-447. Surprisingly, Draft EIS at 3-454 asserts that no alternative would have a below-cost timber sale program. Note, however, that only alternative F approaches the level of harvest that McInnis insists is necessary. See Draft EIS at 3-453 and -463.

[20] If access into these areas was easy, they would have roaded and logged long ago.

[21] Blended Alternative, F-27.

[22] To the best of our knowledge, there are no paper mills in Colorado, so our state is not likely to ever be self-sufficient in this product.

those in the McInnis Plan[23], for which he was the main contractor and author. The McInnis Plan approach ignores critical science of forest ecology.[24]

The McInnis Plan repeatedly expresses worry that a preponderance of old forests on the White River NF will lead to future events like the 1988 Yellowstone fires and the 1939-1952 spruce beetle epidemic centered on the Flat Tops. These were mostly natural events, though Yellowstone was probably exacerbated by years of fire suppression. However, all observers seem to agree that it has recovered very well with minimum long-term damage to resources.

The Draft EIS even shows that the age of spruce-fir stands is not outside the range of historic variability (HRV) that existed before European-based descendants began to settle the area around 1870:

> *"The structure of spruce-fir stands are within their HRV because fire suppression efforts have not significantly affected their much longer fire return interval."*[25]

Note also that the percentage of the White River NF covered by the spruce-fir type is believed to be in the middle of its historic range.[26] The Draft EIS does state, however, that invasion of aspen stands by more shade-tolerant conifers has increased because of fire suppression. Appendix D further shows that major spruce beetle outbreaks occurred prior to settlement: one in the early 1700s and another between 1850 and 1880.[27] In spite of this information, McInnis' Plan insists that old growth should be cut:

- old growth spruce, removed from the suitable base in the Forest Plan, should be put back in this base;[28]
- have shorter rotation ages so that trees can be cut earlier to "favor a more diverse vegetation across the forest" [see further discussion below]);[29]
- need to cut spruce-fir old growth to improve snowshoe hare habitat.[30]

The McInnis Plan would like to see a rotation age of 200 years for spruce-fir and Douglas-fir. However, for the former at least, there are indications that maturity may happen at an age greater than 200:

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[23] Due to public opposition and lack of money, Mr. Woodrow was unable to implement much of his program before he left the Forest in 1987.

[24] At Rep. McInnis' Vail public meeting of April 17, 2000, Mr. Woodrow stated that he is unaware of any studies that indicate recreation can have an impact on wildlife. The literature, however, is rife with such studies. See attachments to Wilderness and Recreation comments, Section W.

[25] Draft EIS at page D-19.

[26] Draft EIS at page D-16, Table D-5.

[27] Draft EIS at page D-35.

[28] Blended Alternative, F-29.

[29] Blended Alternative, F-26.

[30] Any cutting of old-growth spruce-fir would have to be done via shelterwood method, since this timber type does not regenerate in the open. Its 2 or 3 steps would take 20 years to accomplish. Assuming regeneration was then successful, it would take at least another 25 years, and probably more like 45 years, before these trees were tall enough to provide winter forage for hare. Blended Alternative, E-3.

"Englemann spruce is a long-lived tree, maturing in about 300 years... Englemann spruce has the capacity to make good growth at advanced ages. If given sufficient growing space, it will continue to grow steadily in diameter for 300 years, long after the growth of most associated tree species slows down."[31]

The National Forest Management Act prohibits cutting of trees before they have reached the culmination of mean annual increment of growth (16 USC 1604[m]1). This requirement is also stated in the Planning Regulations at 36 CFR 219.16(a)2(iii).[32]

(Unfortunately, the SPECTRUM timber model uses a rotation age as low as 90 for spruce-fir, said to be necessary to ensure proper scheduling of timber harvest. However, rotation age can be as high as 300. See Draft EIS at B-11. In contrast, Draft EIS states that spruce-fir and Douglas-fir have rotation ages "exceeding 250 years".[33])

Implicit in McInnis Plan's argument about the forests being too old is the belief that massive human intervention would save the forest from the natural events which humans consider destructive. It would not. However, it would do likely much damage to the existing resources. In order to have even a minor effect on the possibility of future insect epidemics or wildfire, massive cutting would have to be done in the spruce-fir and lodgepole pine types. This would be very costly in both financial and environmental terms. Wildlife, including numerous species dependent (or nearly so) on older conifer forests, could be displaced or even eliminated from the White River NF. Moreover, this program would have to be continued even after all or most of the stands had been converted to younger forests because eventually even these forests would become old again.[34]

McInnis' Plan would essentially turn large portions of the White River NF into a tree farm by trying to have the same acreage in each age class for each species. This would require regeneration cutting[35] on 3725 acres per year.[36] (Note that this is more than double the most under any of the Draft EIS alternatives which would be 1550 acres of cutting per year.[37]) A balanced age class distribution seldom or never occurred in nature. The only reason to try to achieve this is to have a regular crop of trees to cut every year.

It is not an exaggeration to state that such a massive timber program could do more damage than insects or fires. Insects at least leave the trees they kill standing, so these snags can continue their role in the ecosystem (as hosts for various wildlife and their prey, reduced erosion and sedimentation, formation of new soil, etc.). Fire can be destructive, but it also renews a forest by

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[31] Alexander, 1987, p. 4.
[32] Both the law and the regulations provide for some exceptions.
[33] Draft EIS at 3-450.
[34] Once converted to younger forests, the process of having old forests again would take many years, probably at least 200 years in the case of spruce-fir, during which time the Whiter River NF would be relatively devoid of late-successional wildlife species. Old forests would reappear only if they were not again cut, as the McInnis alternative proposes to do.
[35] A "regeneration" cut is one which promotes a new crop of trees. For lodgepole pine and aspen, this would be accomplished via clearcutting. In spruce-fir and Douglas-fir, shelterwood would be used.
[36] Blended Alternative, F-31.
[37] Draft EIS at 3-454.

recycling burned vegetation into new soil. Logging, on the other hand, removes trees and thus short-circuits the trees' ecosystem functions.

Aspen

The McInnis Plan echoes an often-heard complaint that aspen are declining and are converting to spruce-fir.[38] The latter is no doubt true.[39] However, it can take many years for a stand to completely convert to shade-tolerant conifer. A stand-replacing disturbance during that time would bring back at least some aspen.

Schier, et al, 1984, noted that stands with just a few aspen in them will dominate the regeneration after a disturbance if root densities are adequate. Jones and BeByle, 1984, found that a severe fire in conifer stands with a mere scattering of aspen results in a new aspen forest. But they also found that light fires kill aspen, and that some suckers arise after any fire in stands containing aspen.

More importantly, where is the evidence that the loss of some aspen stands in Colorado would be harmful? The current acreage of aspen on the White River NF to likely be near the upper end of its historic range.[40] This is likely due to extensive cutting and burning of forests by early European settlers.[41]

The analysis in the Draft EIS does show that the early age classes of aspen and lodgepole pine cover fewer acres than in 1887 (the date chosen for comparison with current conditions).[42] However, massively increased logging is not the cure for this problem, if it even is a problem. As stated earlier, logging is not at all like fire in its impact on the landscape. If more young aspen and lodgepole stands are desired, then more fires should be allowed to burn.

Realistically, given the fuel build-up in some lodgepole stands, some fuel reduction, including logging, would have to be done before areas could safely, under certain conditions, be allowed to burn. Also, aspen is usually difficult to burn. Note that Alternative D proposes the second largest amount of prescribed (controlled) burning amongst the alternatives.[43]

Contrary to oft-heard claims, regional descriptions of old growth do include the aspen type (see Mehl, 1992, p. 116-117). While old growth aspen may not last long (acknowledged in Mehl, id.), it does provide good habitat for various wildlife species because cavities are easily bored by woodpeckers (or even appear naturally) in rotten old aspen trees. Thus old, decadent aspen, while having little to no timber value, have considerable value for wildlife.[44]

Travel Management

[38] Blended Alternative, F-18.
[39] For instance, see the Draft EIS at D-16.
[40] Draft EIS at D-16, Table D-5.
[41] See Draft EIS at D-10, -17, -31, and 32.
[42] Draft EIS at D-17, 19.
[43] Draft EIS at 3-162, Table 3-43. Note that big commodity alternative F has the lowest level of prescribed burns.
[44] See Draft EIS at D-35.

In February, many non-motorized recreation organizations and conservation groups, representing 37,960 Coloradoans, signed a joint set of principles outlining responsible management of the forest (see Exhibit MC- 2). To the best of our knowledge, every one of these organizations has been shut out of the opportunity to provide input into Rep. McInnis' plan.[45] Not surprisingly, Rep. McInnis' plan is 100% antithetical to the principles that promote management of recreation's impacts within the ecological constraints of what the forest can accommodate.

For example, McInnis' Blended Alternative opens hundreds of roads the Forest Service recommends for restrictions and closures under Alternative D. Especially egregious are the roads open to all use under McInnis' alternative which were specifically closed by the Forest Service from all motorized travel "to protect soil and water resources due to erosion," qualities McInnis purports to care much about.

Breakdown of the numbers (close approximates):

- Number of trails McInnis recommends as open to all motorized/mechanized use where the Forest Service recommends no motorized/mechanized or closed entirely because of erosion control: **76**

- Number of trails McInnis recommends as open to mechanized use where the Forest Service recommends no motorized/mechanized or closed entirely because of erosion control: **123**

- Number of trails McInnis recommends as open to all motorized/mechanized use where the Forest Service recommends open to mechanized use because of erosion control: **89**

Conclusion

Representative McInnis' Plan for the White River NF represents a throwback to an earlier time in American forest management history when manipulating forests for the benefit of private corporations was considered to be an unadulterated benefit. Our knowledge of science has progressed far beyond this. McInnis' plan fails to acknowledge that wild, healthy forests are the cornerstone of the High Country's economy and source of clean water, recreation, and spiritual renewal. It is incumbent upon the Forest Service to continue the Forest Plan revision process as envisioned, and to dismiss Rep. McInnis' alternative on the merits.

REFERENCES

[45] The Blended Alternative's Travel Management section contains an introductory paragraph which states, "We have made an intensive effort to accurately reflect the input from the Colorado Division of Wildlife, motorized road and trail interests, and mountain bike enthusiasts." Blended Alternative, H-Introduction. Note the omission of hikers, equestrians, backcountry and cross-country skiers, and all other forest users. It is worth clarifying that none of the mountain bike organizations who signed onto the joint principles were contacted by Rep. McInnis for their input.

Alexander, Robert R., 1987. Ecology, Silviculture, and Management of the Englemann Spruce-Subalpine Fir Type in the Central and Southern Rocky Mountains. USDA Forest Service Agriculture Handbook No. 659.

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Mehl, Mel S., 1992. Old-Growth descriptions for the Major Forest Cover Types in the Rocky Mountain Region. IN: Old-Growth Forest in the Southwest and Rocky Mountain Regions: Proceedings of a Workshop. Rocky Mountain Forest and Range Experiment Station. General Technical Report RM-213.

Schier, George A., John R. Jones, and Robert P. Winokur, 1984. Vegetative Reproduction [of aspen]. IN: Aspen: Ecology and Management in the Western United States. Norbert V. DeByle and Robert P. Winokur, editors. USDA Forest Service Rocky Mountain Forest and Range Experiment Station. General Technical Report RM-119.

Attachments

Exhibit MC-1: Aspen Times, 4/19/00, "County Rebuts McInnis claim on Forest Plan".
Exhibit MC-2: Conservation / Non-motorized Recreation Group Joint Statement of Principles Regarding the White River NF plan revision.
Exhibit MC-3: Various articles discussing Rep. McInnis soliciting endorsements for his plan.
Exhibit MC-4: McInnis Plan Treatment of Priority Roadless Areas Recommended for Wilderness by the White River Conservation Coalition