

OUTDOOR ALLIANCE

April 7, 2008

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Re: RIN 0596–AC62: Special Areas; Roadless Area Conservation; Applicability to the National Forests in Idaho

Dear Mr. Gilbert:

Outdoor Alliance, a coalition of six national, member-based organizations includes: Access Fund, American Canoe Association, American Hiking Society American Whitewater, International Mountain Bicycling Association, and Winter Wildlands Alliance, and represents the interests of the millions of Americans who hike, paddle, climb, mountain bike, ski and snowshoe on our nation’s public lands, waters and snowscapes. Collectively, we have members in all fifty states and a network of almost 1,400 local clubs and advocacy groups across the nation.

As outdoor enthusiasts, our constituents need public lands and their topography to do what we do – kayakers need rivers, climbers need escarpments and hikers, mountain bikers, skiers and snowshoers need trails. For our members, some of the most desirable of these natural resources are found in remote and undisturbed places. It is from this perspective that we comment on the Proposed Idaho Roadless Rule (IRR) and its associated Draft Environmental Impact Statement (DEIS) regarding Roadless Area management in Idaho.

Outdoor Alliance believes that the proposed IRR is contrary to the best interests of not only our country’s human-powered outdoor recreation community, but also the unique natural resources contained in the various Forest System Roadless Areas in Idaho. Indeed, the proposed IRR amounts to *reduced* protection and *increased* extractive development of places that our membership treasures for the incomparable recreational experiences they provide. Nationwide, opportunities to experience wild America are rare and becoming more rare as time passes. Releasing a significant portion of these finite lands to resource extraction will negatively and materially impact our memberships’ interests.

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I. The Proposed Idaho Roadless Rule Compromises Too Much of Roadless Acreage

The Idaho Roadless rule predicts large scale and significant impacts on existing Roadless Areas. The Idaho Rule expressly releases 609,500 acres of roadless lands to road building for a wide variety of purposes. The proposed rule aims to manage another 5.25 million acres in a manner that could lead to road building, logging, mining, and other activities not consistent with roadless values. The table below summarizes Forest Service figures regarding the acreage exposed to specific impacts under the proposed rule and compares them to related figures in the 2001 Roadless Rule:

Potential Impacts to Roadless Areas under the 2001 Roadless Rule versus the proposed Idaho Roadless Rule, as predicted by the USFS.¹		
Resource Impact	Acres at Risk under the 2001 Roadless Rule	Acres at Risk under the proposed Idaho Roadless Rule
Impacts to Botanical Resources, Wildlife, and Aquatic Species and Habitat.	0	5,900,000
Scenic Impacts	0	5,900,000
Recreational Impacts	0	609,500 - 5,900,000
Impacts to Wilderness potential	0	609,500 - 5,900,000
Logging for “forest health”	0	1,400,000
Roads + logging in WUI	0	710,000
Noxious Weeds	0	609,500
Geothermal development	0	609,500
Phosphate mines	0	12,100

From our reckoning, the proposed rule is inferior to the 2001 Roadless Rule in terms of enhancing and conserving the very elements that contribute to the roadless qualities of a given place.

II. The Proposed Rule Will Adversely Impact Nationally Significant Backcountry Recreation Pursuits

Backcountry recreationists, seeking the unique experiences that roadless areas provide, are the predominant user of Idaho’s roadless areas. Roadless values like solitude, scenery, wildlife, clean water, intact forests, and the simple fact that there are no roads enrich our experiences of remote, untamed America. Despite being the primary users of these lands, neither the proposed rule nor the DEIS spends much time addressing the impacts of the IRR on backcountry recreationists.

¹ 73 Fed. Reg. 1135, 1143-1150 (January 7, 2008).

The IRR provides “No measurable differences in dispersed recreation opportunities are expected across alternatives.”² The proposed IRR then advises, “Perceptions of remoteness and solitude may be affected in dispersed recreation areas where timber cutting and road construction occur, but effects are constrained by projected levels of these activities.”³ We categorically disagree with the first statement regarding the relative impact of the 2001 rule and the proposed IRR on dispersed recreation. The qualified nature of the second statement, that effects would be constrained by the amount of ground disturbing activity that actually occurs, is little consolation.

Backcountry recreationists treasure the kinds of experiences that Roadless Areas provide. Many of Idaho’s Roadless Areas contain world class climbing routes, hiking and biking trails, rivers, and backcountry ski and snowshoe destinations. The quality of these resources is rooted not only in the distinctive topography, but their *setting*.

Compared to wilderness areas, many Roadless Areas are at relatively lower elevations and offer backcountry recreationists different types of ecosystems and larger river systems. Roadless Areas tend to be more accessible than wilderness areas providing relatively easy access to truly wild places. Management of Roadless Areas also provides for a full spectrum of human-powered pursuits. When compared to Forest Service lands that host extensive road networks, logging and mining, Roadless Areas offer a rare opportunity to experience natural, untamed forests and landscapes free from these impacts.

By opening more acres to road building, or enabling an administrative pathway for more acreage to be opened in the future, the proposed IRR irreversibly undermines the core quality that makes these places acutely valuable to the human-powered outdoor community in the first place. Indeed, the existence of roads (and the landscape attributes that tend to accompany roads) have, in many cases, a binary rather than gradual impact on the quality of experience that can be had in a given stretch of Forest Service land in Idaho.

² *Id* at 1143.

³ *Id.*

The following pursuit-specific vignettes provide tangible examples of the diversity and quality of backcountry recreation experiences offered by the Forest System Roadless Areas in Idaho:

Climbing

Idaho Roadless Areas offer spectacular high country mountain and rock climbing. The Bitterroot Mountains on the Montana border include many alpine summits and rock climbing sites between Lolo Pass and Lost Trail Pass. The Selkirk Crest in Idaho's panhandle provides spectacular alpine recreational opportunities with the chance of seeing caribou, lynx, wolves and grizzly bears. Almost all of the Lemhi and Lost River Ranges are in Roadless Areas. These ranges include classic alpine peaks that are prized by climbers, including the highest peak in Idaho, Borah Peak.

Mountain Biking

Named after a large fire in 1910, the 150,000-acre Great Burn Roadless Area and several adjacent Idaho Roadless Areas are less craggy and at a lower elevation than other parts of the southern Bitterroots. As a result, they offer excellent mountain biking for riders across the region. Despite the name, the Great Burn area still contains impressive stands of old-growth cedar and hemlock, trees that first started growing long before mountain bikes existed. Due to the lack of recent logging, the habitat here is intact enough to support verified grizzly bear populations, a rarity in the lower 48.

Elsewhere in Idaho, the 1200-mile Centennial Trail running north to south down the state contains many segments outside of designated wilderness that cross Roadless Areas and are open to use by mountain bikers.

Backcountry Skiing and Snowshoeing

Roadless lands in central Idaho provide some of the most highly acclaimed backcountry ski and snowshoe opportunities in the United States. The combination of dependable snow and spectacular terrain make Idaho's Roadless Areas a sought-after destination for backcountry skiers and snowshoers from around the world. A few examples of Roadless Areas in Idaho frequented by backcountry skiers, snowshoers and other quiet winter enthusiasts include:

- Grimes Pass and Wilson Peak Roadless Area with world-class backcountry ski terrain around Pilot and Freeman Peaks;
- Ten Mile Roadless Area with a wide range of terrain for different abilities and great views of the Payette River Valley and the Sawtooth Mountains;
- Red Mountain Roadless Area with excellent southern aspects well-suited for late winter and spring skiing;
- Snow Bank Roadless Area with steep terrain overlooking Long Valley; and

- Steele Mountain Roadless Area with steep couloirs providing a wide range of skiing and climbing opportunities.

Hiking

Hiking opportunities in Idaho’s Roadless Areas are incredibly numerous and beautiful. Virtually every Roadless Area features trails. Some of the most important trails in Roadless Areas are in the Lochsa River, North Fork Clearwater, Meadow Creek and Middle Fork Salmon watersheds. These areas offer hikers spectacular backcountry opportunities on many well-maintained trails, including the Idaho State Centennial Trail. The Selkirk, Boulder and White Cloud mountains also provide important hiking resources.

Paddling

Rivers offer a unique way to experience Roadless Areas by water, the original highways used to explore our country. Rivers are such effective corridors of travel that very few of them remain free of adjoining roads, railroads, logging and settlement. As a result, the few remaining wild rivers are invaluable to those Americans who like to experience nature in canoes, kayaks and rafts. Nowhere else in the contiguous United States can paddlers find as many remote and wild rivers as there are in Idaho. The following table lists some of the most treasured rivers flowing through Roadless Areas in Idaho:

Idaho Rivers Flowing Through Roadless Areas

River	Roadless Area	Mileage	Character
NF Boise	Breadwinner	9	Day River
Upper Deadwood	Deadwood	14	Day River
Upper Secesh	Secesh	15	Day River
SF Salmon	Secesh	33	Multi-day
Meadow Creek	West meadow Creek, East Meadow Creek	35	Multi-day
Upper Fish Creek	North Lochsa Slope	1.75	Creek Run
White Sand Creek	NF Spruce - White Sand	12	Day River
Little NF Clearwater	Mallard-Larkins	30	Multi-day
Coeur d'Alene	Spion Kop and West Cathedral Peak	8	Day River

In addition to the rivers that flow directly through Roadless Areas, many other rivers are bordered by Roadless Areas that define their superb scenery and water quality. These include most notably the Lochsa, North Fork Clearwater, Middle Fork Boise, and the South Fork of the Payette rivers. The Lochsa and the Payette are commercially rafted by large numbers of citizens, supporting significant regional recreation economies.

These vignettes demonstrate the breadth and quality of unique backcountry recreational resources in Idaho Roadless Areas. What may not be as obvious is that these are national resources treasured by the national human-powered outdoor recreation community.

Outdoor Alliance's members live in every state in the Nation and have an interest in Idaho's Roadless Areas. Many of these members regularly visit and have personal connections with Idaho's Roadless Areas.

As we understand it, the proposed IRR was premised on input from a little over 1500 individuals and a collection of county and state officials from Idaho. It is axiomatic that the State of Idaho must have a say in how to manage the National Forests in Idaho. However, given that the Idaho Roadless Areas are national resources, we believe that the proposed IRR should be presented in the broader context of the 2001 Roadless Rule. The forests of Idaho are well known for the world-class backcountry recreation and our members from across the country travel to Idaho to enjoy the experiences these places provide. The 2001 Rule arose out of more than 600 hearings held nationwide and more than 1.6 million public comments, 95% favoring the nationwide protections in the rule. It was and remains today among the most popular, most comprehensively scoped and vetted natural resource management policies in history.

III. The Proposed Idaho Roadless Rule Will Adversely Impact Idaho's Economy

The Outdoor Industry Association reports that active outdoor recreation in Idaho supports 37,000 jobs, \$154 million in annual tax revenue and \$2.2 billion in retail sales and services. This represents roughly 5% of the gross state product. It does not appear that the proposed IRR takes into sufficient account the positive effect of outdoor recreation in the state. Recreation in Idaho's backcountry, including in Roadless Areas, is a unique "product" that the state offers to its residents and the rest of the nation. The human-powered outdoor recreation community prefers and actively seeks the kinds of experiences that only backcountry areas can provide. Many of our members travel long distances to vacation in Idaho to enjoy spending time in Roadless Areas.

The DEIS Socioeconomic Specialist Report finds that under the 2001 Roadless Rule "Idaho Roadless Areas would continue to provide high quality... Primitive, Semi-Primitive Non-Motorized, and Semi-Primitive Motorized classes of recreation," as well as "natural-appearing landscapes with high scenic quality..."⁴ In contrast, the IRR "does represent some risk to soil, water, air, and wildlife resources. Activities associated with the Idaho Roadless Rule—including roads, power lines, and facilities—could reduce the non-commodity values and amenities of the Idaho Roadless Areas affected...there could be some reductions in a few localized areas negatively affecting recreation use and non-use values, especially from areas that experience mineral or energy development."⁵

The 2001 Roadless Rule protects Idaho's recreation economy by protecting its wild places, which are a sustainable and unique product of Idaho. The IRR would materially

⁴ Roadless Area Conservation; National Forest System Lands in Idaho DEIS; Social and Economic Specialists Report, Page 57.

⁵ *Id.* at 59.

compromise those benefits forever in areas released to one-time or long-interval resource extraction. A policy for Idaho's roadless areas more in line with the 2001 Roadless Rule appears to offer better and more sustainable economic value to the state.

In addition to the economic effect on Idaho, the 2001 Roadless Rule is also superior in its contribution to the economies in other states. Specifically, the DEIS and IRR clearly show that the 2001 Roadless Rule will yield cleaner water, more anadromous fish, cleaner air and more wildlife to neighboring and downstream states. It may also increase sales revenue of outdoor equipment and services for states that serve as tourism bases for Idaho visitors.

IV. Central Design Elements of the Idaho Roadless Rule Will Degrade Roadless Area Acreage and Roadless Values in Idaho's National Forests

Shortcomings of the Themed Approach

The Idaho Roadless Rule is premised on a sliding scale or themed approach. Whereas the 2001 Roadless Rule designated a single category of Roadless Area, the proposed IRR contemplates five themes, with each theme receiving a different level of resource protection and a different extent of likely future development.

Outdoor Alliance fundamentally disagrees with this design element -- inventoried roadless areas should not be managed on a sliding scale of designating themes for the management. All roadless lands have a host of values inherent to roadless areas that are diminished, and in some cases, destroyed by road building and/or resource extraction. The sliding scale approach is inconsistent with the fact that each and every Roadless Area has value as a backcountry recreation destination, and protects water quality, provides high quality habitat, and offers superb scenery in many cases because they lack roads and the development associated with roads.

Furthermore, even if a themed approach is ultimately pursued, Outdoor Alliance questions whether the "backcountry" theme identified in the proposed IRR will be adequately protective. The proposed IRR allows road construction in Idaho Roadless Areas designated to be managed pursuant to the backcountry theme when roads are

needed to protect public health and safety in cases of significant risk or imminent threat of flood, wildland fire, or other catastrophic event that, without intervention, would cause the loss of life or property; or to facilitate forest health activities permitted under § 294.25(c)(1)⁶

⁶ 73 Fed. Reg. 1135, 1152.

The proposed IRR further elaborates that the provision contemplates:

access for (1) areas where wind throw, blowdown, ice storm damage, or the existence or imminent threat of an insect or disease epidemic is significantly threatening ecosystem components or resource values that may contribute to significant risk of wildland fire; or (2) areas where wildland fire poses a threat to, and where the natural fire regimes are important for, threatened and endangered species or their habitat consistent with HFRA.⁷

This broad language appears to offer too many avenues to build roads in too large a portion of the Roadless Areas in Idaho when the local ecosystem can likely take care of itself. Indeed, forests in Idaho naturally exhibit a mosaic of insect infestations, blow down, and fire (and have done so for quite a long time). Equally upsetting, the IRR notes that in backcountry areas, road construction or reconstruction is allowed for the leasing of phosphate materials.⁸

The themed approach, coupled with the broad discretion to build additional roads, puts well over half of Idaho's roadless lands back into play for future development. The proposed IRR justifies the themed approach because it allows the Forest Service to consider the unique characteristics of each inventoried roadless area in the State. Outdoor Alliance believes, however, that the simple attribute of being an inventoried roadless area is the dominant unique characteristic of these places. Further subdividing these lands from a management perspective is redundant and certainly appears to ignore the overwhelming public support for managing them in a holistic rather than themed manner.

Projected Impacts on Roadless Areas Should Be Premised on Robust Rather than Anemic Federal Spending Projections

The DEIS and IRR typically state that the actual impacts of the IRR will be much lower than the potential impacts. For example:

Shifts in the number of roadless area acres assigned to more permissive management themes can increase the potential for adverse effects to roadless characteristics. However, reasonably foreseeable effects in the next 15 years are likely to be limited by levels of road construction/reconstruction, timber cutting, and leasable minerals activity actually projected to occur during that time.⁹

Given that Roadless Areas cannot be regenerated subsequent to road construction, Outdoor Alliance feels that precautionary and conservative assumptions (as in assuming the upper end of development, not the lower) should be used in projecting the impact of

⁷ Id. at 1139.

⁸ Id. at 1141.

⁹ Id. at 1143.

the proposed IRR. Budgets (and priorities within the same) regularly change from year to year due to political leadership and public priorities. As such, management of these areas could certainly change. Assumptions tied to budget constraints provide no reliable protection for Roadless Areas. Likewise, assurances of limited impacts of the IRR due to the 15 year window for implementation referenced throughout the DEIS and IRR provide little assurance that as times passes, Roadless Areas in Idaho will not gradually decrease in size or number.

*Administrative Flexibility to Change Theme Designations is Not Appropriate
Considering the Ecological Characteristics of Roadless Areas*

The IRR would allow the Chief of the USFS to eliminate inventoried roadless areas for a wide array of reasons – with no oversight or meaningful opportunities for public involvement. The process is based on an “admittedly subjective assessment.”¹⁰ Outdoor Alliance believes that any boundary changes that would decrease Roadless Area boundaries or values should be fully vetted with the public through a formal rulemaking process. Boundary changes that further and irreversibly shrink the finite amount of roadless lands are no small matter, and deserve great caution and careful consideration.

V. Responses to the Proposed Roadless Rule’s Three Queries to the Public

In the proposed rule, the Forest System requests particular responses to three questions, the first of which is:

To what extent should the Forest Service allow building roads for the purpose of conducting limited forest health activities in areas designated as backcountry?

Outdoor Alliance feels that no road building should be allowed in Roadless Areas for the purpose of “forest health.” Road building in Roadless Areas diminishes their value as backcountry recreational destinations, impacts their ecological integrity, and generally impacts their roadless qualities.

The second question asks:

Are the limitations on sale of common variety minerals and discretionary mineral leasing appropriate?

While we certainly appreciate the Forest Service’s efforts to limit discretionary mineral leasing and the sale of common variety minerals as specified in the IRR, our preference is that no new roads be built in inventoried roadless areas to facilitate (directly or incidentally) extractive endeavors in these areas.

¹⁰ Id. at 1141.

Finally, the Forest Service queries:

Will the proposed mechanism for administrative corrections and modifications be sufficient to accommodate future adjustments necessary due to changed circumstances or public need?

We do not believe that this is the case with respect to roadless characteristics. Rather, we fear that the proposed mechanism will allow for a steady erosion of roadless lands and roadless values through incremental administrative elimination of protections on roadless lands. Roadless lands are inventoried and finite, and any process to carve off portions of roadless land for development tends to run contrary to the interests of the human-powered outdoor community.

Conclusion:

Idaho's Roadless Areas offer first-rate outdoor recreation opportunities in untamed setting that would be directly and negatively impacted by adopting the Idaho Roadless Rule. In contrast to the proposed IRR, the 2001 Roadless Rule is the alternative that best protects Roadless Areas and Americans' ability to enjoy them on foot, skis, snowshoes, bikes, boats and using ropes.

Roadless Areas are a finite resource, and chipping away at them as the IRR proposes would represent an irretrievable loss to today's citizens and future generations. As our nation continues to develop and our citizenry gets increasingly alienated from nature, the best thing that we can do is to give the few wild lands left in America a fighting chance to continue to thrive.

Best regards,



Adam Cramer
Outdoor Alliance General Council and Policy Architect

cc: Martin Bartels, *Executive Director, American Canoe Association*
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