



July 13, 2011

Colorado Roadless Rule/EIS
P.O. Box 1919
Sacramento, CA 95812

Re: Special Areas; Roadless Area Conservation; Applicability to the National Forests in Colorado

Submitted via <http://www.regulations.gov>

On behalf of the Society of American Foresters (SAF), the national scientific and educational organization representing the forestry profession in the United States, please accept the following comments on the proposed Colorado Roadless Rule (hereafter referred to as the Proposed Rule). As the organization chartered to advance the science, education, technology, and practice of forestry for the benefit of society, SAF has been actively involved with the management of forestlands in both the public and private sectors since its inception. These comments have been developed and submitted jointly by the Society of American Foresters, representing over 14,000 professional foresters nationwide, and by the CO/WY State Society, representing over 400 members in the Colorado and Wyoming Chapters of SAF. The Society of American Foresters hopes this effort will bring the roadless issue to a conclusion in the State of Colorado as long-term uncertainty in management objectives results in negative impacts for the forest and the surrounding communities.

SAF commends the process and joint effort the US Forest Service and the State of Colorado used to develop this Proposed Rule. This collaboration provides a better framework to integrate local and national concerns on contentious issues like roadless areas and their future management. SAF believes that recognizing the need for some level of active forest management activities to address heavy fuel loadings in Colorado Roadless Areas (CRA's) near at-risk communities is an important component for effective land management in roadless areas.

SAF's concerns with the Proposed Rule are primarily a lack of clarity on management objectives, the lack of discussion on concerns related to the significant mountain pine beetle outbreak in northern and central Colorado, the misplaced guidance on cutting only small-diameter trees, and the high-level management approvals required for activities. These concerns are explained in greater detail below.

A road network is a critical component for the management of healthy forests. Roads provide the access to areas by both personnel and equipment. Road availability and condition are critical factors in the cost and feasibility of most forest management activities. SAF recognizes that roads can also create some of the greatest impacts to the forest ecosystem, whether through erosion, sediment deposition in waters, conduits for invasive species expansion, or through increased human use. However, regarding the following statement on page 4 of the *Rule Making for Colorado Roadless Areas Revised Draft Environmental Impact Statement* (hereafter referred to as the Summary Document):

“As recognized in the 2001 Roadless Rule, tree-cutting, sale or removal, and road construction/reconstruction have the greatest likelihood of altering and fragmenting landscapes...”

While there was evidence to support that statement in 2001, the large intense wildfires and major mountain pine beetle infestations over the past 10 years have shown that forests are dynamic and influenced by many other stressors that impact the forest landscape.

SAF has the following specific concerns about the draft regulations:

Upper Tier Designations

In the Federal Register (p. 21275), the Forest Service specifically requested comments on the “concept, management, and rationale for designation of specific areas within the Colorado Roadless Rule identified as ‘upper tier.’” SAF believes that a more detailed explanation for how upper tier areas are delineated needs to be provided, and the management objectives of these ‘upper tiers’ need to be defined in a format understandable to the average reader.

The Summary Document (p. 14) for this Proposed Rule contains the following:

“This alternative designates 562,200 acres as CRA upper tier acres. These areas were identified in forest plans, or during forest plan revision processes, as areas where tree-cutting and road building restrictions would be appropriate.”

There must be an error in the second sentence because, as written, it seems to contradict the intent of upper tier areas. Perhaps the word ‘inappropriate’ should replace ‘appropriate’? Continuing with the premise that there is an error at the end of the sentence, the identification “...in forest plans, or during forest plan revision processes ...” does not provide enough information to determine if the boundaries of the upper tier areas were drawn arbitrarily or through use of sound criteria (for example, areas in approved Forest Plans with Management Prescriptions 1.2 or 1.31). It should be further noted that the upper tier acres included on the GMUG National Forest did not go through a formal forest plan comment period on management prescriptions before being designated as upper tier in the Proposed Rule.

The Proposed Action, as described in the Summary Document (p. 4), states that this rule is intended to provide direction on how roadless areas should be managed in the future, to wit:

“The Department, in cooperation with the State of Colorado, proposes to promulgate a state-specific rule to manage roadless areas and conserve roadless area characteristics on NFS lands in Colorado.”

However, SAF reviewers had a very difficult time trying to determine exactly what this management would entail. If experts in the forestry profession are unable to determine the management direction of the Proposed Rule, the general public will likely have a difficult time as well. Using a format similar to the 2003 Revised Medicine Bow National Forest Plan, Table 2-2 of Chapter 2 would be helpful, where the

reader can easily determine if specific uses such as road construction, timber harvesting, and motorized recreation are permitted in particular Management Prescription Areas.

An area of potential concern by our reviewers pertains to the use of chainsaws to fell hazardous, dead standing trees or to remove fallen trees from established trails in upper tier areas. Reviewers were unable to determine whether or not this was addressed in the Proposed Rule and given the high mountain pine beetle activity in Colorado and the long-term work effort, the necessary tools need to be directly defined.

Mountain Pine Beetle Outbreak

While the Draft Environmental Impact Statement of the Proposed Rule does mention the significant mountain pine beetle outbreak in northern and central Colorado, there was no discussion of how the Proposed Rule would affect the mitigation of dead standing tree hazards or the future recovery of these forests (for example, refer to above comments on upper tier areas).

Broad Tree Cutting Restrictions

SAF recommends that the Proposed Rule avoid establishing broad restrictions on the type of harvesting and tree cutting that is recommended for fuels reduction in CRAs. For example, projects that are "...focused on small diameter trees to create fuel conditions to modify fire behavior ..." (Federal Register, p. 21276) may not be appropriate in many of the forest types that are found in CRAs. Although the Proposed Rule recognizes that this should be done to the "maximum extent practical" (*sic* – should be practicable, not practical), this rule would set up an expectation that only small trees would be removed for hazardous fuels reduction.

The types of harvesting needed for fuels treatments and forest health should be in concert with the recommendations of a certified silviculturist who has viewed the specific area on the ground. Lodgepole pine types and spruce/fir types may require the removal of larger trees to reduce fuels or address insect and disease problems. The Proposed Rule ignores the possible need for forest health treatments, such as aspen enhancement at higher elevation mixed-conifer stands. This could be very critical for climate change adaptation treatments, and the cutting/removal of large-diameter remnant aspen or overstory conifers may be needed to promote aspen regeneration. As the Proposed Rule currently reads, these aspen treatments could only be conducted through a fuels treatment or a project to improve habitat for "...Federally threatened, endangered, and proposed sensitive species ..." (Federal Register, p. 21276). The success of aspen treatments could be compromised by restricting cutting to only the small-diameter trees.

Finally, there is also the question of what constitutes a "small-diameter" tree. In other words, at which diameter is a tree considered large and should be left standing.

Distances from CPZ

As we understand it, tree harvesting and treatments can take place up to 1½ miles from the boundary of Community Protection Zone (CPZ), provided there is Community Wildfire Protection Plan. However, road construction would still be limited to one-half mile from a CPZ. Given current economic conditions, the road construction restriction will severely limit wood product removal for utilization purposes (to help fund the fuels treatment) and/or to further improve fuels reduction efforts for areas greater than 1,000 feet from a road. Therefore, SAF is concerned that these areas will not receive the treatments needed for effective fuels reduction.

As stated earlier in these comments, the biggest threat to roadless area landscapes may not be tree cutting but rather fire and insects. Many areas that underwent tree harvesting in the past still have a high degree of naturalness and natural integrity. For example, areas that were ‘tie-hacked’ in the 1920s are still part of today’s roadless inventory on several National Forests. But many of these roadless areas have been or will be burned over by wildfire or attacked by epidemic populations of bark beetles. While an area may still retain its roadless characteristic, other environmental services (e.g. wildlife habitat, watershed protection, etc.) could be compromised by the dynamic forces of nature and the loss of opportunity for more effective management.

Regional Forester Decision Official

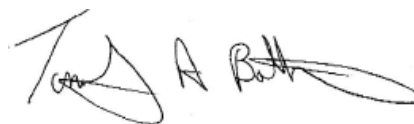
SAF recommends that the Forest Service reconsider having the Regional Forester designated as the “Responsible Official” for decisions under this Proposed Rule. While understandably required for activities in congressionally designated Wilderness Areas, requiring approval at that high a level in the Forest Service for activities in agency-designated CRAs is unnecessary and excessively burdensome. SAF recommends that the Responsible Official be the Forest Service employee with the normal authority to make authorizations and other decisions in these areas (usually a District Ranger or Forest Supervisor). These officials already have responsibilities to ensure that the activities they approve meet the myriad of existing regulatory requirements, and SAF believes that these forestry professionals possess the competencies necessary to implement the Proposed Rule.

SAF considers decisions made related to road networks, such as those in the proposed Colorado Roadless Rule, are of critical importance in the long-term management of forestland. We appreciate your consideration of the above comments.

Sincerely,



Roger A. Dziengeleski, CF
President, Society of American Foresters



Timothy A. Bottomley
Chair, Colorado/Wyoming SAF State Society