July 14, 2011

Colorado Roadless Rule/EIS
P.O. Box 1919
Sacramento, CA  95812
COComments@fsroadless.org

RE:  Specialty Areas; Roadless Area Conservation; Applicability to the National Forests in Colorado - Proposed Rule
RIN 0596-AC74

Honorable Tom Vilsack      Tom Tidwell
Secretary, U.S. Department of Agriculture  Chief, Forest Service
1400 Independence Ave. S.W.   1400 Independence Ave. S.W.
Washington, DC 20250    Washington, DC 20250

Dear Secretary Vilsack and Chief Tidwell:

As national and major regional organizations, Outdoor Alliance, Outdoor Industry Association, American Alpine Club, American Mountain Guides Association and The Colorado Mountain Club represent the interests of the human powered outdoor recreation community and the active outdoor recreation industry in America.¹ The millions of individuals and thousands of businesses that make up our broader community treasure the kinds of experiences that Roadless Areas provide. Many of Colorado’s Roadless Areas (CRA) 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. For us, the management of CRAs is not an abstract policy concern; OA, OIA, CMC and AAC are imbued with and dependent on the quality recreation opportunities offered by roadless areas in Colorado. Of the six OA members, two – Access Fund and the International Mountain Bicycling Association – are headquartered in Colorado along with The Colorado Mountain Club and the American Alpine Club. OIA is headquartered in Colorado and represents 160 manufacturers, retailers and outdoor advocacy organizations across the state. This diverse and growing outdoor community and industry is drawn to Colorado for the quality of life and outdoor pursuits and represents a core component of communities and economies throughout the state.
We have reviewed the proposed Colorado Roadless Rule (CRR) and associated Draft Environmental Impact Statement (DEIS) published in the April 15, 2011 Federal Register. The following are our comments on the proposed rule and the DEIS. Also included are responses to USDA’s “specific request for public comment” regarding: 1) specific areas within Colorado Roadless Areas that should be included in the upper tier lands including the reason for inclusion; 2) exceptions on tree cutting sale, or removal and road construction/reconstruction that should apply to upper tier lands; and 3) the effective means of managing linear facilities in Colorado Roadless Areas.

At the beginning of this process, the Obama Administration specified an unambiguous target for the Colorado Roadless Rule – the rule must offer conservation protections as strong as or stronger than the 2001 Roadless Rule. While the proposed rule is much improved from earlier efforts, the meager acreage presently in the upper tier category (562,200) precludes the proposed rule from hitting the Obama Administration’s target. We feel that the adoption of DEIS Alternative #4, which is identical to the proposed rule except that it has approximately 2.6 million acres in the upper tier category, would put the Administration’s target much more in reach. Including additional acreage in the upper tier as specified in our attached portfolio of candidate parcels of greatest importance to the active outdoor recreation community would improve USDA’s accuracy further still.


The State of Colorado submitted a revised petition (Colorado revised petition) for a state-specific roadless rule to govern CRAs on April 6, 2010. On July 9, 2010 we wrote to you and provided some perspectives from our community based on our initial evaluation of the revised petition. We are pleased to see that many of the concerns we expressed in these themes are addressed in the proposed rule.

First, preserving roadless area characteristics language has been modified to better focus management on conservation and stewardship of CRAs. Specifically, problematic qualifying language that was in the Scope and Applicability section of the Colorado revised petition at §294.37(f) has been removed. We also appreciate that the proposed rule’s “Purpose” provision frames the various development exceptions to the CRR in the broader context of conserving roadless area characteristics.¹

Second, insect and disease outbreak language has been made more conservative by replacing previous language with ecosystem-focused management language at §294.42(c)(3) focusing on the need to “maintain or restore the characteristics of ecosystem composition, structure and processes.”² We also endorse the provisions of the proposed rule that keep tree cutting decisions with the Regional Forester, rather than a responsible official as was contemplated in earlier iterations of the rule.³


² Id. at 21290.

³ Id. at 21289.
Third, the proposed rule incorporates fundamental elements of our suggestions for a more explicit plan for decommissioning and restoration of the roads at §294.43(d)(2) by requiring a decommissioning provision in all contracts or permits. We also endorse the revised language in this section that requires decommissioning plans be designed to “protect resources and enhance roadless area characteristics” (without a cost qualifier) rather than the previous language of the Colorado revised petition at §294.33(e)(2) to restore areas to a “condition generally consistent with the pre-existing roadless area characteristics.”

2. Opportunities to Further Improve Regulatory Language in the Proposed Rule.

The proposed rule vests in a “responsible official” decision-making authority as to when circumstances allowing for permanent road construction exist. Given the acreage of CRAs at stake, and the value they have to both the state of Colorado and the nation, we feel that this decision-making authority should reside at least at the level of Regional Forester. Regional Foresters should also make the decisions regarding road construction or reconstruction rather than a responsible official. To this end, the term “responsible official” should be changed to “Regional Forester” in §§294.43(b) and (c).

USDA invested a significant amount of time and effort updating and adjusting the CRA boundaries for the proposed rule. While we greatly appreciate the public notice and comment provisions in § 294.47(a), given the investment in adjusting the CRA boundaries for the proposed rule, we believe that future non-administrative modifications to CRA boundaries should be conducted pursuant to rulemaking. We do not believe the 2001 Roadless Rule enabled the Chief of the Forest Service to make non-administrative border adjustments and do not understand the justification for extending this discretion in the proposed rule.

3. The Qualitative and Quantitative Value of Outdoor Recreation Must Be Factored Into The Proposed Rule.

While rule’s preamble notes that roadless areas “help provide for a high quality of life for local residents” and the “backdrop for world-class skiing, hunting and fishing, and backcountry experiences for non-residents,” the proposed rule and DEIS continue to undervalue the contribution of outdoor recreation to the state economy. Indeed, the preamble states that, “distributional effects or economic impacts are not evaluated for other economic sectors (e.g. timber harvest, recreation) due to evidence in Table 2 suggesting that the extent or magnitude of changes in output or services are not sufficient to cause significant changes in jobs and income for those economic sectors.” We do not think that this is the case.

The DEIS summarizes Colorado’s economy in Table 3-53. The table provides 15 industry categories along with the value of production, employment and labor income associated with

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4 Id. at 21273.
5 Id. at 21279.
each category. The industry category “Arts, Entertainment and Recreation” is defined as follows:

Arts, Entertainment, and Recreation include a wide range of establishments that operate facilities or provide services to meet varied cultural, entertainment, and recreational interests of their patrons. This sector comprises (1) establishments that are involved in producing, promoting, or participating in live performances, events, or exhibits intended for public viewing; (2) establishments that preserve and exhibit objects and sites of historical, cultural, or educational interest; and (3) establishments that operate facilities or provide services that enable patrons to participate in recreational activities or pursue amusement, hobby, and leisure-time interests.  

While there is certainly some overlap between the “Arts, Entertainment and Recreation” industry category and the active outdoor recreation economy in Colorado, they are plainly not the same thing. First, the value of production for this industry category is approximately $4.3B, less than half of the $10 billion economic contribution of active outdoor recreation in the state. Second, aspects of the active outdoor recreation economy may very well be present in numerous other industry categories cited in the DEIS, such as trade, professional services, transportation and accommodation & food services. In other words, it does not appear that the way the DEIS characterizes economic activity in the state takes into account the state’s massive active outdoor recreation economy as a separate entity. This disconnect essentially prevents USDA from reconciling the relative impact of the four alternatives identified in the DEIS on this critical part of the state’s economy.

As noted in our previous comments, active outdoor recreation contributes $10 billion annually to the state’s economy and employs 100,000 Coloradoans. In addition, the active outdoor recreation economy also generates nearly $500 million in annual state tax revenue and produces $7.6 billion annually in retail sales and services across Colorado– accounting for 4% of gross state product. These figures are of the same scale as other industry categories in the DEIS and should not be made effectively irrelevant.

The world-class opportunities for active outdoor recreation in the State of Colorado, and particularly those found in backcountry Roadless Areas, represent a unique “product” that the state offers to its residents as well as visitors from across the country and around the world. We are confident that USDA can establish and incorporate reasonable methodologies for reconciling the well-established active outdoor recreation economic figures with the economic analysis in the DEIS.

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7 Id. at 290.

8 SOUTHWICK ASSOCIATES, INC. FOR THE OUTDOOR INDUSTRY FOUNDATION, STATE-LEVEL ECONOMIC CONTRIBUTIONS OF ACTIVE OUTDOOR RECREATION—TECHNICAL REPORT ON METHODS AND FINDINGS 19, 24 (2007).

9 Id.

10 Id.
4. **Upper Tier Section Summary**

The Specific Request for Public Comment asks for public input regarding specific areas within Colorado Roadless Areas that should or should not be included in the Upper Tier land including the reason for inclusion or exclusion. We are pleased to see the inclusion of an Upper Tier and view this as a pragmatic means of balancing narrowly defined exceptions for mining, future ski area development, and community protection zones. For this balance to be achieved, however, and a rule created that is as protective or preferably more protective than the 2001 rule, the 562,200 acres represented by the preferred alternative needs to be expanded. The preferred alternative identifies areas where road building is already prohibited in current forest plans, and this needs to be supplemented with additional acres that have important backcountry recreation value and are in need of stronger administrative protection.

To provide specific suggestions for additions to the Upper Tier beyond the preferred alternative we have completed an inventory, attached as Exhibit 3 that highlights some of the outstanding recreation areas found in CRAs. The inventory was developed with input from outdoor recreationists from across Colorado and around the country and focuses on areas located within CRAs, but which are not provided Upper Tier protection under Alternative 2. Many of these areas would be afforded protection by adoption of Alternative 4. Other areas are not included under either alternative, but strongly merit protection through Upper Tier designation.

The most noteworthy areas highly valued by our community for the backcountry recreational experiences they provide are as follows:

- The Colorado Trail, an iconic destination for mountain bikers and hikers, crossing through 26 CRAs along its 483-mile route;
- The Continental Divide Trail, which traverses Colorado’s highcountry for 800 spectacular miles of its route from the Canadian border to Mexico;
- The Animas River Canyon and its tributaries, a world-famous whitewater boating destination;
- The Arkansas River Valley, home to peerless mountain biking trails and whitewater;
- The Cache La Poudre Canyon and its upper reaches, presenting outstanding opportunities for backcountry winter travel, climbing, hiking, mountain biking and whitewater boating, all within a short drive from Colorado’s Front Range population centers;
- The Vail Pass area, and other tremendously popular backcountry areas for winter recreation and summer hiking in and around Colorado’s Summit County.

5. **Management of Upper Tier Areas**

The Specific Request for Public Comment asks for public input on tree-cutting, sale, or removal and road construction/reconstruction as applied to Upper Tier lands. In addition to expanding the acreage as discussed above, we believe the CRR should provide stronger protection language for conservation of roadless area values and characteristics of Upper Tier lands. Specifically, a final
Colorado Roadless Rule at §294.46 should ensure that all Upper Tier lands have strict No Surface Occupancy stipulations to protect these areas from the impacts of any future oil and gas leasing and development on the defining characteristics of these areas that make them eligible for Upper Tier designation.

6. **Linear Facilities**

Prohibition of Linear Construction Zones is an important element of the CRR and an area where the Specific Request for Public Comment identified an interest in additional feedback on management. We believe certain exceptions need to be tightened. Specifically §294.44(c) states that installation of a liner facility will include “placement within existing right-of-ways where feasible,” and this should be modified to “shall be located entirely within existing right-of-ways.” In addition, language at §294.44(b)(2) stating that electrical power lines or telecommunication lines will be authorized in roadless areas “only if there is no opportunity for the project to be implemented outside of a Colorado Roadless Area without causing substantially greater environmental damage” is vague. We have witnessed examples of new transmission corridors cut through forested backcountry with a significant impact on backcountry values. With potential cost savings as a primary incentive and no clear standards in place, we can see how a utility might build an arbitrary justification for a route through a roadless area that results in “less environmental damage.”

One critical omission from the language in § 294.44 is a reference to the treatment of Linear Construction Zones in Upper Tier areas. This distinction needs to be made if Upper Tier area designation will truly result in conservation of the highest value roadless areas. This can be achieved by modifying § 294.44 as follows:

§ 294.44 Prohibition on linear construction zones.
(a) General. A linear construction zone may not be constructed or reconstructed in Colorado Roadless Areas except as provided in paragraphs (b) and (c) of this section.
(b) Upper Tier Acres. Notwithstanding the prohibition in paragraph (a) of this section, a linear construction zone may only be constructed or reconstructed in Colorado Roadless Area upper tier acres if the Responsible Official determines that a linear construction zone is needed pursuant to reserved or outstanding rights, or as provided for by statute or treaty.
(c) Non-Upper Tier Acres. Notwithstanding the prohibition in paragraph (a) of this section, the Regional Forester may authorize a linear construction zone within a Colorado Roadless Area outside upper tier acres in the following circumstances: [insert existing regulatory content from § 294.44(b)(1)-(4)]

We believe that our proposed language will close the loophole that currently allows linear construction zones in the Upper Tier Acres.

**Conclusion**

Colorado’s Roadless Areas offer first-rate outdoor recreation opportunities that represent a finite resource. As our nation continues to develop and our intact landscapes become increasingly fragmented,
the value of our undeveloped public lands only increases. USDA pledged that the Colorado rule would be “as protective or preferably more protective” than the National Roadless Rule. While significant progress has been made, and the current draft is greatly improved from previous versions, the proposed Colorado Rule still falls short of this standard.

Thank you for considering these comments.

Best regards,

Brady Robinson
Executive Director, Access Fund

Wade Blackwood
Executive Director, American Canoe Association

Gregory Miller
President, American Hiking Society

Mark Singleton
Executive Director, American Whitewater

Michael Van Abel
Executive Director, International Mountain Bicycling Association

Mark Menlove
Executive Director, Winter Wildlands Alliance

Adam Cramer
Policy Architect, Outdoor Alliance

Craig Mackey
Director of Recreation Policy, Outdoor Industry Association

Katie Blackett
Chief Executive Officer, The Colorado Mountain Club

Phil Powers
Executive Director, American Alpine Club

Betsy Winter
Executive Director, American Mountain Guides Association

cc: Mary Wagner, Associate Chief, National Forest System
Joel Holtrop, Deputy Chief, National Forest System
Jim Bedwell, Director Recreation, Heritage, and Volunteer Resources
Robert Bonnie, Senior Environment and Climate Advisor to Secretary Vilsack, USDA

Thomas O’Keefe, PhD., Pacific Northwest Stewardship Director, American Whitewater
Kevin Colburn, National Stewardship Director, American Whitewater
Jason Keith, Esq., Policy Director, Access Fund
Forrest McCarthy, Public Lands Director, Winter Wildlands Alliance
Jenn Dice, Government Affairs Director, International Mountain Bicycling Association
Jeremy Fancher, Esq., Counsel, International Mountain Bicycling Association
David Zayas, Esq., Director of Government Relations, American Hiking Society
Jay Heeter, Director of Conservation, The Colorado Mountain Club
Deanne Buck, American Alpine Club
Leigh Goldberg, Access Director, American Mountain Guides Association
Tom Flynn, Grasstops Fellow, Outdoor Alliance
Amy Roberts, Vice President of Government Affairs, Outdoor Industry Association

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, OA has members in all fifty states and a network of almost 1,400 local clubs and advocacy groups across the nation. Local clubs based in Colorado are identified in Exhibit 1.

Founded in 1989, Outdoor Industry Association (OIA) is the premier trade association for companies in the active outdoor recreation business. OIA member companies include manufacturers and retailers such as The North Face, Patagonia, L.L. Bean, Jansport, Eagle Creek, VF Outdoor, Coleman, REI, Timberland and Columbia Sportswear. OIA provides trade services for over 4000 manufacturers, distributors, suppliers, sales representatives and retailers in the outdoor industry and is the title sponsor of Outdoor Retailer, the world’s largest outdoor products tradeshow. A sampling of OIA members from Colorado is included in Exhibit 2.

The Colorado Mountain Club (CMC) is the oldest outdoor education, recreation, and conservation organization in Colorado. Founded in 1912, CMC boasts 8,000 members and 14 chapters across the state. CMC offers a wide range of opportunities for the public to explore, observe, and learn about the Southern Rockies, while simultaneously leading efforts to protect the species, habitats, and wildness of our public lands.

Establish in 1902, the American Alpine Club (AAC) is dedicated to supporting American endeavors in mountain and crag environments around the world. The AAC provides benefits to members; conservation and research funding; produces the American Alpine Journal and houses a 60,000 volume mountaineering library and museum at its headquarters in Golden, Colorado. The AAC is the U.S. representative to the International Mountaineering and Climbing Federation.

For over 30 years, the American Mountain Guides Association (AMGA) has been dedicated to supporting the guiding community through excellence in education, standards and certification to enhance the quality of services provided to the public, while serving as a resource for accessing and protecting the natural environment. AMGA represents over 1,900 members, over 30 Accredited Guide Services, and 60 Corporate Partners. Each year the training provided by the AMGA reaches over 600,000 people through direct contact between certified guides and their clients.
Exhibit 1

Member-Based Clubs Affiliated with Outdoor Alliance Organizations in Colorado

4 Corners Climbing Coalition
Action Committee for Eldorado
Avid4 Adventure Inc.
Backcountry Snowsports Alliance
Bicycle Colorado
Big Wheel Racing
Boulder Mountain-Bike Alliance
Bouldercycling.Com / Cutting Edge Sports
Cloud City Wheelers
Colorado Fourteeners Initiative
Colorado Mountain Bike Association
Colorado Mountain Club
Colorado Plateau Mountain Bike Trail Association
Colorado Springs Climbers Alliance
Colorado Whitewater Assoc.
Colorado Whitewater Association
Colorado Youth Program
Corral Bluffs Alliance
Crested Butte Mountain Bike Assn
Denver Climbers Coalition
Dolores River Action Group
Durango Whitewater
Eco Trails / Eagle County
Flatirons Climbing Council
Friends of Arkansas River
Friends of Red Mountain Pass
Friends of the Route Backcountry
Friends of the Yampa
Grand Canyon Private Boat Association
Gunnison Trails
Headwaters Trails Alliance
Horizon Program Kayak Club
Kokopelli Bike Club
Lower Arkansas Mountain Bicycling Association
Medicine Wheel Trail Advocates
Mountain Top Cycling Club
North Colorado Climbers Coalition (NC3)
Old Spanish Trail Association
Pikes Peak Whitewater Club
Pueblo Paddlers
Quiet Use Coalition
Roaring Fork Climbers Coalition
Roaring Fork Outdoor Volunteers
Rocky Mountain Bicycle Boys
Rocky Mountain Canoe Club
Rocky Mountain Field Institute
Rocky Mountain Sea Kayak Club
Rocky Mountain Canoe and Kayak Club
Routt County Riders
San Miguel Bike Alliance
San Miguel Whitewater Association
Sand Creek Regional Greenway Partnership
Singletrack Mountain Bike Adventures
Southern Colorado CRAG
Stand up for Rivers
Summit Winterlands and Trails
Team Evergreen
Team Velo Bella
The Colorado Trail Foundation
Town Of Breckenridge - Trail Planner
Trails 2000
Trails and Open Space Coalition
Volunteers for Outdoor Colorado
Western Colorado Climbers Coalition
YMCA of the Rockies
### Exhibit 2

**Colorado-Based Members of the Outdoor Industry Association**

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Boa Technology Inc.
Manufacturer

Boure Sportswear
Retailer

Brand Amp
Associate

Brandwise
Associate

Breckenridge Outdoor Education Center
Associate

C.A.M.P. USA
Manufacturer

Catalyst Communication Inc
Associate

Centerstone Technologies
Supplier

Chuck Latham Associates, Inc.
Retailer

Climb Axe
Retailer

Climbing Magazine/Urban Climber
Associate

Cocona Inc.
Manufacturer

Collective Licensing International, LLC
Associate

Multisport Journeys, LLC
Manufacturer

National Geographic Maps
Associate

Native Eyewear
Manufacturer

Neve Designs
Manufacturer

New Wave Enviro Products Inc
Distributor

Nite Ize / RCP Enterprises Inc.
Manufacturer

O Loves M Eco Bags
Manufacturer

Old Town Outfitters
Retailer

Onit Sports Marketing
Associate

Open Air Brands-Fenix Flashlights
Distributor

Osprey Packs
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Outdoor Divas
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Outlast Technologies, Inc.
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Outward Bound
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Paragon Guides, Inc.
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Retailer
Katies Bumpers  
Manufacturer

Kelty Pack Co.  
Manufacturer

Leave No Trace (Center for Outdoor Ethics)  
Associate

Leisure Trends Group  
Associate

Ute Mountaineer, Ltd.  
Retailer

V Five, Inc. Dba Lefever Building Systems  
Associate

Vectra Bank of Colorado  
Associate

Verde PR & Consulting  
Associate

Vision Graphics  
Associate

Voormi  
Manufacturer

Wagner Custom Skis  
Retailer

Teko, LLC  
Manufacturer

The Trailhead, Inc.  
Retailer

Trespass USA  
Manufacturer

Unfinished Furniture Expo  
Retailer

United States Hang Gliding & Paragliding Association  
Associate

Wallaroo Hat Company, LLC  
Manufacturer

The Walton Works, LLC  
Associate

What's UP PR  
Associate

The Wilderness Land Trust  
Associate

Wind X-treme  
Manufacturer

With a Twist  
Manufacturer

Zeal Optics  
Manufacturer

Zuke's  
Manufacturer
Exhibit 3
Colorado Roadless Areas: Recreational Resources Inventory

The following sections inventory and highlight some of the outstanding recreation areas found in Colorado Roadless Areas. The inventory was developed with input from outdoor recreationists from across Colorado and around the country.

Among the most noteworthy areas are:

- The Colorado Trail, an iconic destination for mountain bikers and hikers, crossing through 26 CRAs along its 483-mile route;
- The Continental Divide Trail, which traverses Colorado’s highcountry for 800 spectacular miles of its route from the Canadian border to Mexico;
- The Animas River Canyon and its tributaries, a world-famous whitewater boating destination;
- The Arkansas River Valley, home to peerless mountain biking trails and whitewater;
- The Cache La Poudre Canyon and its upper reaches, presenting outstanding opportunities for backcountry winter travel, climbing, hiking, mountain biking and whitewater boating, all within a short drive from Colorado’s Front Range population centers;
- The Vail Pass area, and other tremendously popular backcountry areas for winter recreation and summer hiking in and around Colorado’s Summit County.

The inventory focuses on areas located within CRAs, but which are not provided Upper Tier protection under Alternative 2. Many of these areas would be afforded protection by adoption of Alternative 4. Other areas are not included under either alternative, but strongly merit protection through Upper Tier designation.

The inventory also includes some areas where recreational activities may take place outside of the designation, but where the quality of the outdoor experience is dependent upon protection of the CRA, for example where the viewshed from atop a climbing area or within a river corridor is dominated by the CRA.

If every CRA with recreational resources as documented below were designated Upper Tier in its entirety, that would total approximately 1,592,500 acres. The areas we have identified represent an increase of 1,327,400 additional acres over Alternative 2, and an increase of 446,800 additional acres over Alternative 4.

In the inventory that follows, areas are grouped by National Forest. Where a recreation area includes portions within multiple National Forests, the resource is grouped with the Forest that includes the majority of the area. The Colorado Trail and the Continental Divide Trail are included under the heading of the National Forest at their respective northern ends. The acreages provided are based on the numbers associated with the Forest Service’s Google Earth layer for the Colorado Roadless Rule.
Arapaho-Roosevelt National Forest

Cache La Poudre River (Big South)

CRA: Comanche Peak Adjacent Area, 44,158 acres (17,129 acres designated Alternative 2
Upper Tier)

Status: Upper Tier under Alternative 4

The Big South section of the Cache La Poudre River is consistently described as perhaps the finest whitewater run in Colorado, and the *Whitewater of the Southern Rockies* guidebook calls it “One of the signature runs of Colorado, if not the signature run.” Beginning at the outflow of the Long Draw Reservoir (at approximately 40.502821, -105.771020) and flowing north to a takeout at the Big South trailhead (approximately 40.632939, -105.807274), the river flows through a spectacular and remote forest setting. The 12-mile run is notable for its length, traveling its entire distance through an unspoiled and undeveloped setting. This world class recreational resource undeniably deserves the scenic and water quality protections of Upper Tier designation for the Comanche Peak Adjacent Area CRA.

Cache La Poudre River

Grey Rock, Monastery, Palace, climbing areas
Hewlett Gulch Trail (mountain biking)
Grey Rock National Trail (hiking)

CRA: Grey Rock CRA, 12,067 acres

Status: Partially protected under Alternative 4; new proposed Upper Tier area

Grey Rock CRA contains diverse and outstanding outdoor recreation opportunities and is especially valuable because of its proximity to Fort Collins and other major population centers on Colorado’s Front Range.

Grey Rock itself (40.715672, -105.292650) offers outstanding rock climbing opportunities on a spectacular granite massif, culminating in a true summit at 7613 feet. In addition, Grey Rock CRA contains classic routes at the Monastery and the Palace, as well as innumerable bouldering opportunities and other routes. The area is popular with hikers, and includes the Grey Rock National Recreation Trail. The Hewlett Gulch trail to the west of Grey Rock Mountain is a popular mountain biking attraction.

The Cache La Poudre River flows along, and in places through, the southern boundary of the CRA. These sections of the Poudre offer outstanding whitewater recreation opportunities, from the challenging Narrows section, to mellower stretches suitable for beginning boaters further downstream. These sections are runnable at a wide range of water levels, and offer whitewater recreation opportunities long after other runs in the area have dropped out.
**Joe Wright Creek**

**CRA:** Green Ridge-East CRA, 26,626 acres (9,663 acres designated Upper Tier under Alternative 2)

**Status:** Partially protected under Alternative 2; new proposed Upper Tier area

Joe Wright Creek (from approximately 40.6039, -105.835 to 40.633, -105.809) flows through the Green Ridge-East CRA. This creek provides an outstanding whitewater recreation opportunity especially valuable because of its accessibility from major population centers on the Front Range. Joe Wright Creek, along with the downstream Spencer Heights section of the Cache La Poudre and the nearby Big South section of the Cache La Poudre, is part of a cluster of accessible, high quality whitewater, drawing recreationists from across the state and the country. To protect the scenic aspects of this area, as well as the water quality of the downstream areas popular with kayakers, rafters, tubers, and fishermen, the entire Green Ridge-East CRA should be afforded Upper Tier protection.

**Cameron Pass Area**

**CRA:** Rawah Adjacent Area CRA, 2768 acres (478 acres Alternative 2 Upper Tier)

**Status:** Partially protected under Alternative 2; new proposed Upper Tier area

The Cameron Pass area, is popular with snowshoers and crosscountry skiers, and within the Rawah CRA, there are several popular routes, including the Cameron Connection and Montgomery Pass. The area features impressive scenery and reliable snowpack in winter, and is easily accessible from Fort Collins and other Front Range populations centers. While, only a small portion of this area is proposed for Upper Tier protection under Alternative 2, the entire Rawah Adjacent Area merits Upper Tier protection because of its outstanding opportunities for quiet wintertime outdoor recreation in a scenic and accessible setting.

**North Saint Vrain**

**CRA:** North Saint Vrain CRA, 11,203 acres (6540 designated Upper Tier under Alternative 2)

**Status:** Upper Tier under Alternative 2

The North Saint Vrain (from approximately 40.217400, -105.523000 to just downstream of the Buttonrock Reservoir) is a Front Range classic for whitewater kayakers. The run offers long, challenging rapids through the run’s 9.5 miles, culminating in a spectacular granite canyon for the second half of the river. The run’s granite boulder-garden character is rare in Colorado and makes this section of river a uniquely valuable recreational resource.
Berthoud Pass Area

**CRA:** Vasquez Adjacent Area CRA, 6,910 acres (5902 acres Upper Tier under Alternative 2); James Peak CRA, 2301 acres  
**Status:** Upper Tier under Alternative 4

The Berthoud Pass area, formerly the site of a ski resort, has become an exceptionally popular and accessible area for backcountry skiers. Popular areas on the west side of the pass include First and Second Creek, currently proposed for Upper Tier designation, as well as the areas to the west just north of the Henderson Mine (approximately 39.769925, -105.846223). Given the extraordinary popularity of this area for wintertime outdoor recreation, however, the entire Vasquez Adjacent Area should be given Upper Tier designation. To the east side of the pass, the southwest face of Colorado Mines Peak is also a popular area for skiers. This area, within the James Peak CRA, should also be designated in the Upper Tier.

Grays and Torreys Peaks

**CRA:** Mount Sniktau CRA, 7771 acres; Porcupine Peak CRA, 7640 acres (White River National Forest)  
**Status:** Partially protected under Alternative 4; new proposed Upper Tier area

Located at the junction of the Mount Sniktau and Porcupine Peak CRAs, Grays and Torreys Peaks (39.633507, -105.816933 and 39.642532, -105.820870 respectively) are an extraordinarily popular hiking destination. Grays Peak is the highest point on the Continental Divide in the United States. These areas should be protected through Upper Tier designation.
Grand Mesa-Uncompahgre-Gunnison National Forests

**Reno/Flag/Bear/Deadman Trail**

**CRA:** Granite Basin CRA, 25,519 acres (9,265 designated Upper Tier under Alternative 2)

**Status:** Upper Tier under Alternative 4

This classic mountain bike loop is often described as one of the best rides in the Crested Butte area. The ride begins on FS Road 740 at the Deadman Gulch trailhead (approximately 38.874710, -106.798100), and winds its way northeast, before turning south and entering the Granite Basin CRA at approximately 38.862435, -106.764001. From there, it continues south to approximately 38.834046, -106.761181 before turning west-northwest, and ultimately back to Road 740. While a portion of the CRA to the south and west of the trail is designated Upper Tier under Alternative 2, that area should be expanded to, at minimum, include this outstanding recreational resource.

**Trail 401**

**CRA:** Schofield Pass CRA, 875 acres

**Status:** New proposed Upper Tier area

This 14-mile loop mountain bike ride through the heart of the Schofield Pass CRA is often described as the best ride in Colorado. From the Judd Falls trailhead (approximately 38.965970, -106.993920), the ride follows Gothic Road towards Schofield Pass for approximately 4.5 miles before turning east into the CRA for a long singletrack descent through fields of wildflowers and aspen groves. This world-famous outdoor recreation resource should be given Upper Tier protection.

**Doctor Park**

**CRA:** Matchless Mountain CRA, 26,999 acres

**Status:** Upper Tier under Alternative 4

Doctor Park is a third classic Crested Butte area mountain bike ride. The trail can be ridden as a loop, beginning with an approximately 8 mile ride from the North Bank Campground up Spring Hill Road (CO Road 744), or as a shuttle, eliminating the road portion of the ride. The off-road portion of the ride begins on trail 554 at approximately 38.825250, -106.727410 and heads south through the Matchless Mountain CRA to finish back at North Bank Campground (approximately 38.730317, -106.757728). This scenic, classic, and accessible resource deserves Upper Tier protection.
**Flowing Park**

**Kannah Creek**

**CRA:** Kannah Creek CRA, 34,594 acres

**Status:** Upper Tier under Alternative 4

Flowing Park mountain bike trail begins off road A S-52 4/10 at approximately 38.955451, -108.102321. The trail heads to the southwest and makes a loop through the southern half of the Kannah Creek CRA with a western tip at approximately 38.898482, -108.180681. Because of the trail’s high elevation, it offers relief from summer heat, and it is popular with crosscountry skiers in wintertime.

Kannah Creek trail begins off G S Road at approximately 38.960921, -108.230813 and can be ridden as an out-and-back to approximately 38.944459, -108.161071. This trail offers technical singletrack in a high elevation setting.

These areas are valuable components of the Fruita and Grand Junction area’s world class trail network, and should be protected with Upper Tier designation.

**Blue Creek Trail**

**CRA:** Long Canyon CRA, 17,165 acres

**Status:** Upper Tier under Alternative 4

The Blue Creek trailhead is located off the west side of FR 402 (Divide Road), just south of FR 408 (Dominguez Road) at approximately 38.619371, -108.667270. The trail, open for hiking, horseback riding, and mountain biking, runs west for five miles, before ending at trail 643, Leonard’s Ridge trail. Running through the heart of the Long Canyon CRA, this area should be protected through Upper Tier designation.

**Atkinson Bench Trail**

**CRA:** Johnson Basin CRA, 11,943 acres

**Status:** Upper Tier under Alternative 4

The Atkinson Bench Trail winds its way north-south from approximately 38.503037, -108.600933 to approximately 38.483946, -108.585470. The 4.4-mile long trail approximates the western boundary of the Johnson Basin CRA. Flowing through scenic groves of aspen, the trail is popular with hikers, mountain bikers, and horseback riders.
Ruby Fork Anthracite Creek  
Anthracite Creek  

**CRA:** Horse Ranch Park CRA, 3,880 acres; Munsey/Erickson CRA, 3,511 acres (2,632 acres designated Upper Tier under Alternative 2)  

**Status:** Partially protected under Alternative 4; new proposed Upper Tier area  

Ruby Anthracite and Anthracite Creek are small streams flowing off the west side of Kebler Pass offering opportunities for steep-creek whitewater kayaking. The upper section of the Ruby Fork begins of CR 12 (Kebler Pass Road) at approximately 38.862800, -107.163000. The creek from there runs to the north-northwest through the Horse Ranch Park CRA before joining Anthracite Creek on the northeast side of Marcellina Mountain and turning west into Anthracite’s Dark Canyon. The Dark Canyon section passes through the Munsey/Erickson CRA, and often begins with a hike in on FT 836, beginning just off Kebler Pass Road at approximately 38.911454, -107.232498. The section ends at Erickson Campground (approximately 38.954404, -107.271062). These areas should be preserved through Upper Tier designation for the Horse Ranch Park and Munsey/Erickson CRAs.
Pike-San Isabel National Forests

Mount Elbert

**CRA:** Mount Elbert CRA, 22,090 acres  
**Status:** New proposed Upper Tier area

Mount Elbert, at 14,440, is the highest mountain in Colorado and the second highest point in the Lower 48. The summit is accessible via a number of straightforward and popular routes. This iconic and significant attraction should be protected by Upper Tier designation for the Mount Elbert CRA.

Clear Creek of the Arkansas  
Lake Creek  
Twin Lakes Loop Trail

**CRA:** Elk Mountain-Collegiate North CRA, 32,069 acres  
**Status:** Partially protected under Alternative 4; new proposed Upper Tier area

Clear Creek of the Arkansas includes a classic whitewater run beginning at 38.9833, -106.44 and ending at 39.0067, -106.323. This section flows between two portions of the Elk Mountain-Collegiate North CRA, and deserves the crucial water quality and viewshed protections of Upper Tier designation. This is a popular river with locals and visitors, and a classic training ground for the area’s more challenging runs, as well as a spectacular resource in its own right because of its continuous rapids and beautiful scenery.

Lake Creek, from near mile marker 69 on Highway 82 (approximately 39.081500, -106.537000) to the Willis Gulch picnic area near the town of Twin Lakes, is the best low-volume creek run in the Arkansas River Valley. This world famous run flows off the east side of Independence Pass and through the Elk Mountain-Collegiate North CRA, where it drops through tight gorges and over spectacular falls.

The Twin Lakes loop is a popular and high-quality mountain bike ride circumnavigating Twin Lakes reservoir that includes sections of the Colorado Trail and the Continental Divide Trail.

Lake Creek and Clear Creek of the Arkansas are world class recreational resources that contribute to Buena Vista’s reputation as one of the greatest whitewater boating towns in the country, and the Twin Lakes trail is yet another aspect to the fantastic outdoor recreation opportunities present in the Arkansas River valley. These outstanding resources draw visitors from around the world and merit protection through Upper Tier roadless designation for the Elk Mountain-Collegiate North CRA.
The Colorado Trail

CRA: Green Mountain, Lost Creek East, Lost Creek West, Jefferson, Tenmile, Ptarmigan Hill B, Ptarmigan Hill A, Holy Cross, Mount Massive, Elk Mountain-Collegiate North, Elk Mountain-Collegiate South, Kreutzer-Princeton, Mount Antero, Chipeta, Agate Creek, Starvation Creek, Antora Meadows/Bear Creek, Cochetopa Hills, Cochetopa, Bristol Head, Big Buck/Kitty/Ruby, Pole Mountain/Finger Mesa, Weminuche Adjacent, San Miguel, Blackhawk Mountain, Hermosa CRAs

Status: Partially protected under Alternative 4; new proposed Upper Tier area

The Colorado Trail, running from Denver to Durango, offers an incomparable experience for hikers and mountain bikers. Over the trail’s 483 miles, it passes through six National Forests and six Wilderness areas (with detours available for mountain bikes). It traverses five major river systems, and pass through eight different mountain ranges. The trail’s average elevation is over 10,000 feet. The Colorado Trail is a peerless resource, drawing visitors from around the world. At minimum, the areas of the CRAs through which it passes or within the trail’s viewshed should be protected through Upper Tier designation.

Monarch Crest Trail

CRA: Agate Creek CRA, 11,826 acres (Grand Mesa-Uncompahgre-Gunnison National Forest); Chipeta CRA, 28,686 acres; Starvation Creek CRA, 7,565 acres

Status: Partially protected Under Alternative 4; new proposed Upper Tier area

The Monarch Crest trail begins from a trailhead atop Monarch Pass at approximately 38.495980, -106.325500. From there, it heads south-southeast, roughly following the border between the Agate Creek and Chipeta CRAs and winding between the two. It then continues south, before entering the Starvation Creek CRA and turning east across that area. After leaving the Starvation Creek CRA, the trail turns northeast and runs just outside the northwest border of the Porphyry Peak CRA before ultimately ending at Highway 285. For a part of its length, the Crest trail overlaps with a portion of the Colorado Trail.

The Monarch Crest is a spectacular, high elevation journey, popular with hikers as well as mountain bikers. The trail covers more than 30 miles of mostly singletrack, with portions above the treeline and others running through stunning mixed forest. This world-class resource for hikers and mountain bikers should be protected by Upper Tier designation.

Kenosha Pass

CRA: Jefferson CRA, 10,902 acres

Status: Upper Tier under Alternative 4

The section of the Colorado Trail from the trailhead at Kenosha Pass (approximately 39.41293, -105.75876) to Georgia Pass (approximately 39.456525, -105.911374) is a popular section of trail with both hikers and mountain bikers, passing through the Jefferson CRA. While all of the
Colorado Trail merits Upper Tier protection, this popular section in particular should be protected through Upper Tier designation.

**Grape Creek**  
**Tanner Peak Trail**  
**CRA:** Tanner Peak CRA, 17,729 acres  
**Status:** Upper Tier under Alternative 4

Grape Creek, from approximately 38.320400, -105.347000 north to Cañon City, offers low-volume paddling through a scenic setting, including the west side of the Tanner Peak CRA.

Tanner Peak trail (FT 1333) offers exhilarating views of the Royal Gorge, Pikes Peak, and the Sangre de Cristo Range and passes through five of Colorado’s nine major ecosystems, from semi-desert to subalpine forest.

To protect these valuable recreational resources, the Tanner Peak CRA should be protected by Upper Tier designation.

**South Platte River**  
**Big Rock Candy Mountain**  
**CRA:** Sheep Rock CRA, 8013 acres  
**Status:** New proposed Upper Tier area

Big Rock Candy Mountain (39.131375, -105.322308), at approximately 1,000 feet high, may be the largest rock formation in the Platte drainage. Big Rock Candy Mountain offers climbers a number of challenging multi-pitch routes in a relatively remote setting.

The South Platte River, through the Sheep Rock CRA to Cheeseman Reservoir, is the scenic runout for the Cheeseman Canyon section of the South Platte, an adventurous and pristine canyon enjoyed by experienced whitewater boaters. To protect these outstanding recreational resources, the Sheep Rock CRA should be afforded Upper Tier protection.
Rio Grande National Forest

Conejos River

CRA: Conejos River / Lake Fork CRA, 870 acres

Status: New proposed Upper Tier area

The Conejos river contains an approximately 6.4 mile intermediate-difficulty whitewater run (from 37.308, -106.48 to 37.227, -106.467) through a scenic setting, largely within the Conejos River/Lake Fork CRA. The run passes through an open volcanic gorge and features impressive geologic formations, including the Pinnacles, and late summer flows maintained for irrigation create recreational opportunities after other runs in the area have dropped for the season. This recreational resource should be protected through Upper Tier designation for the Conejos River/Lake Fork CRA.
Continental Divide Trail

**CRA:** Dome Peak, Long Park, Troublesome North, Troublesome South, Never Summer
Adjacent Area, Never Summer South, Indian Peaks Adjacent Area, James Peak, Vasquez
Adjacent Area, Byers Peak, Williams Fork Ptarmigan Adjacent, Bard Creek, Mount
Sniktau, Burning Bear, Jefferson, Tenmile, Ptarmigan Hill B, Ptarmigan Hill A, Holy
Cross, Mount Massive, Elk Mountain-Collegiate North, Texas Creek, Sanford Basin,
Romley, Mount Antero, Agate Creek, Chipeta, Starvation Creek, Antora Meadows/Bear
Creek, Cochetopa Hills, Cochetopa, Bristol Head, Big Buck/Kitty/Ruby, Carson, Pole
Mountain/Finger Mesa, Cataract, Beartown, Turkey Creek, Treasure Mountain, Summit
Peak/Elwood Pass, Chama Basin CRAs

**Status:** Partially protected under Alternative 4; new proposed Upper Tier area

In 1978, Congress designated the Continental Divide National Scenic Trail. This 3,100-mile
backcountry route from Canada to Mexico is a spectacular pathway through an iconic American
landscape, perhaps highlighted by the trail’s 800-mile journey through Colorado. Along with the
Pacific Crest Trail and the Appalachian Trail, the Continental Divide Trail is one of the
definitive experiences for backcountry hiking in America. This invaluable resource must be
protected by Upper Tier designation for the many CRAs through which it passes. At minimum,
those areas immediately surrounding the trail and within its viewshed should be protected.

Rabbit Ears Pass
Rabbit Ears Peak
Fish Creek
North Fork Fish Creek
Buffalo Pass

**CRA:** Mad Creek CRA, 24,305 acres; Long Park CRA, 42,111 acres; Walton Peak CRA, 5,258
acres

**Status:** Partially protected under Alternative 4; new proposed Upper Tier area

The Rabbit Ears Pass area, to the north of Highway 40 and to the west of Rabbit Ears Pass
(40.384520, -106.611888) offers many opportunities for crosscountry skiing and snowshoeing in
a quiet winter landscape within the Long Park CRA. The area includes wintertime routes like
Bruce’s Trail, Fox Curve Loop, Hogan Park Trail, West Summit Loop 1A, and West Summit
Loop 1B. Rabbit Ears Peak offers spectacular views from atop its visually compelling volcanic
tower.

To the south of Highway 40, popular wintertime routes exist in the Walton Peak CRA, including
the North Walton Peak Loop, Par-a-lel Route, and the South Summit Loop. Walton Peak itself
(40.35440, -106.6992) and the surrounding area is popular for hiking, skiing, and snowshoeing
for Steamboat Springs area residents and visitors.
Fish Creek and the North Fork of Fish Creek are two steep-creek whitewater runs flowing west into Steamboat Springs from the northern part of the Long Park CRA. While the most commonly boated section of Fish Creek—from Fish Creek Falls (approximately 40.481777, -106.772260) to Steamboat Springs—is outside the boundaries of the CRA, Upper Tier designation would help to protect water quality in this outstanding small stream. The North Fork of Fish Creek is an outstanding steep creek run within the CRA itself for the approximately one-mile section above the confluence with Fish Creek.

Buffalo Pass (summit at approximately 40.532440, -106.667331) and CR 38 divide Long Park CRA to the south and Mad Creek CRA to the north. Both areas are popular destinations for backcountry skiing, particularly in the areas surrounding Soda Mountain and Buffalo Mountain.

In addition to its other many recreation opportunities, portions of the Colorado Trail and the Continental Divide Trail pass through the Long Park CRA. These valuable outdoor recreation resources should be protected through Upper Tier designation for the Mad Creek, Long Park, and Walton Peak CRAs.
San Juan National Forest

Animas River Canyon
Lime Creek
Canyon Creek
Needle Creek

CRA: East Animas CRA, 16,854 acres; West Needles CRA, 6,887 acres; Weminuche Adjacent, 23,614 acres

Status: Partially protected under Alternative 4; new proposed Upper Tier area

The East Animas, West Needles, and Weminuche Adjacent Roadless Areas border the Animas River along the segment between Silverton and Rockwood, one of the nation’s most outstanding whitewater runs, and the Animas, together with its spectacular tributaries, is a draw for whitewater river runners from across the state, the country, and the world.

The Animas River from Silverton to Rockwood is one of the longest whitewater runs in Colorado and flows through spectacular scenery in the heart of the San Juan mountains. Often paddled as a two-day trip, this section draws boaters from around the world. The run passes through the East Animas, Weminuche Adjacent, and West Needles CRAs.

Lime Creek, from near the intersection of Old Lime Creek Road and Highway 550 (approximately 37.720895, -107.748367) flows through three distinct gorges before entering the Animas river. These three sections include boulder garden rapids and waterfalls, including Adrenaline Falls, one of the most iconic whitewater features in the country, featured on the cover of the first edition of Colorado Rivers and Creeks. The run flows largely through the Weminuche Adjacent and West Needles CRAs, both of which should be given Upper Tier protection to protect this outstanding recreational resource.

Needle Creek and Canyon Creek are two Animas River tributaries entering from the east side of the river. These spectacular creeks are typically accessed from the Animas River by kayakers hiking upstream from the creeks’ confluences with the Animas. Needle Creek enters the Animas at approximately 37.627637, -107.697658. Canyon Creek meets the Animas at approximately 37.521769, -107.782620. Both sections are almost entirely within the boundaries of the East Animas CRA.

Of these areas, only 2415 acres of West Needles and 599 Weminuche Adjacent are proposed for the Upper Tier in Alternative 2. In light of their backcountry recreation value and the fact that the Upper Animas attracts visitors from around the world, the 47,355 acres of these roadless areas should be included in the Upper Tier. At a minimum the following areas should be included: portions of the East Animas Roadless Area along the Animas River upstream and downstream of the confluence with Cascade Creek, Weminuche Adjacent along Lime Creek including Adrenaline Falls (37.705, -107.7519), Weminuche Adjacent along the Animas River as included in Alternative 2, and expansion of West Needles in Alternative 2 to make it contiguous with existing wilderness and include the Third Gorge on Lime Creek before it joins the Animas River.
These modifications to the proposed action are essential to protect water quality and the scenic viewshed of this world-class recreation destination.

**Hermosa Creek**  
**Hermosa Creek Trail**

**CRA:** Hermosa CRA, 148,103 acres (63,140 acres designated Upper Tier under Alternative 2)  
**Status:** Upper Tier under Alternative 4

Hermosa Creek (from approximately 37.6269, -107.924 to 37.4136, -107.835) is a long whitewater run north of Durango flowing through the heart of the Hermosa CRA, and the Hermosa Creek Trail, paralleling the river through the length of the CRA is an outstanding, nearly 20-mile-long section of singletrack, often described by mountain bikers with superlatives. While the west side of Hermosa Creek is currently proposed for the Upper Tier under Alternative 2, this entire area is worthy of Upper Tier protection given the value of this resource for hikers, mountain bikers, and kayakers.

**South Mineral Creek**  
**Molas Pass Area**

**CRA:** San Miguel CRA, 64,047 acres (26,242 acres designated Upper Tier under Alternative 2)  
**Status:** Upper Tier under Alternative 4

South Mineral Creek immediately upstream from South Mineral Campground (approximately 37.81, -107.7) is a short but classic advanced to expert level whitewater run surrounded by spectacular high mountain scenery, but relatively accessible to visitors coming from Silverton and Durango. The Molas Pass Area on the west side of Highway 550 from Molas Pass (approximately 37.737276, -107.697959) offers excellent opportunities for backcountry skiing. While much of the area surrounding Engineer Mountain to the south is designated Upper Tier under Alternative 2, the area should be expanded to include, at a minimum the areas around South Mineral Creek, the Colorado Trail, and Molas Pass.

**Piedra River**

**CRA:** Piedra Area Adjacent CRA, 40,841 acres  
**Status:** Partially protected under Alternative 2; proposed new Upper Tier area

The Piedra River (from approximately 37.426800, -107.193000 to just north of Highway 160) offers a scenic intermediate to advanced level whitewater trip through a pristine backcountry area, including portions of the Piedra Area Adjacent CRA. While a small riverside area is proposed for inclusion in the Upper Tier under Alternative 2, the entire portion of the CRA, or at minimum, those areas closely following the river, deserve protection in the Upper Tier to protect the scenic characteristics and water quality of this run.
**East Fork San Juan River**

**CRA:** South San Juan Adjacent CRA, 34,899 acres (6252 Alternative 2 Upper Tier)

**Status:** Upper Tier under Alternative 4

The East Fork of the San Juan (from approximately 37.383100, -106.857000 west to highway 160) flows through the South San Juan Adjacent, a portion of which is included in the Upper Tier. Because of the outstanding recreational value of this run, the entire area should be afforded Upper Tier protection to safeguard its outstanding scenery and water quality.

**West Fork San Juan River**

**CRA:** Turkey Creek CRA, 25,303 acres (6814 Alternative 2 Upper Tier)

**Status:** Partially protected under Alternative 2; fully protected under Alternative 4

The West Fork San Juan River (from approximately 37.471800, -106.929000 to 37.450241, -106.910774) flows through the Turkey Creek CRA. This is the best small-creek run in the Pagosa Springs area. While portions are designated Upper Tier in Alternative 2, the designation should be expanded to include, at minimum, the areas immediately surrounding this outstanding whitewater resource.
White River National Forest

Vail Pass

CRA: Ptarmigan Hill A CRA, 13,072 acres; Ptarmigan Hill B CRA, 6,983 acres; Ryan Gulch CRA, 630 acres; Coral Creek CRA, 3,252 acres

Status: Partially protected under Alternative 4; new proposed Upper Tier area

Ptarmigan Hill A and B CRAs off the west side of Vail Pass are among the most popular backcountry winter destinations in the world. This extraordinarily popular area for backcountry skiing, crosscountry skiing, and snowshoeing should be protected through Upper Tier designation.

Ptarmigan A, known locally as Ptarmigan or Acorn Creek, is a popular Nordic skiing and snowshoeing area.

Ptarmigan Hill B, known locally as Ute Pass, is largely comprised of terrain between 10,500 and 12,000 feet and offers great skiing. Its proximity to Ute Pass Road makes the area highly accessible.

Ryan Gulch, on the east side of Vail Pass and to the west of Silverthorne, is a popular local area for snowshoeing and Nordic skiing.

Coral Creek, to the north of I-70, is an exceedingly popular area for backcountry skiers that also features outstanding Nordic ski trails.

These outstanding backcountry winter recreation destinations should be protected through Upper Tier designation.

Hoosier Ridge

CRA: Hoosier Ridge CRA, 8,920 acres (2,934 acres located in Pike-San Isabel National Forest)

Status: Partially protected under Alternative 4; new proposed Upper Tier area

Hoosier Ridge CRA, just south from Breckenridge, offers some of Colorado’s finest opportunities for backcountry and Nordic skiing, as well as incredible Nordic touring. The area’s primitive backcountry character should be protected by Upper Tier designation.
**Tenderfoot Mountain Area**

CRA: Tenderfoot Mountain CRA, 8,389 acres  
Status: Upper Tier under Alternative 4

The Tenderfoot Mountain CRA, particularly the higher, west-facing aspects, are a popular local backcountry skiing destination. To protect this valuable recreational resource, the Tenderfoot Mountain CRA should be given Upper Tier designation.

**Porcupine Peak Area**

CRA: Porcupine Peak CRA, 7,640 acres  
Status: Upper Tier under Alternative 4

The Porcupine Peak area, particularly its higher elevation areas, is a popular area for backcountry skiers. This valuable resource should be protected through Upper Tier designation.

**Tenmile Area**  
**Tenmile Creek**

CRA: Tenmile CRA, 6,265 acres  
Status: Partially protected under Alternative 4; new proposed Upper Tier area

The Tenmile area is a classic backcountry skiing destination, including the popular Sky Chutes and the Knarly Chute on the northeast side of Peak 1.

Tenmile Creek, from just off I-70 to Dillon Reservoir, flow briefly through the northernmost portion of the CRA. This is the most popular after-work whitewater run for the Summit County area. Though mostly outside the CRA, Upper Tier designation would help to protect water quality in this outstanding resource.

Tenmile CRA also is bisected by a section of the Colorado Trail and the Continental Divide Trail. To protect all of these invaluable recreational resources, the Tenmile CRA should be given Upper Tier designation.

**Chicago Ridge Area**

CRA: Chicago Ridge CRA, 5,098 acres  
Status: Partially protected under Alternative 4; new proposed Upper Tier area

The Chicago Ridge area offers great skiing and diverse terrain for a variety of backcountry winter activities. This area should be protected through Upper Tier designation.
**Piney River**

**CRA:** Freeman Creek CRA, 967 acres; Lower Piney CRA, 13,545 acres  
**Status:** Partially protected under Alternative 2; fully protected Under Alternative 4

The Piney River, flowing through the Freeman Creek, and Lower Piney CRAs (from approximately 39.710000, -106.423000 northwest to State Bridge on highway 131), is a long and remote-feeling whitewater run offering a high degree of adventure. To protect this whitewater gem, Freeman Creek CRA and Lower Piney CRA should be designated Upper Tier.

**Grizzly Creek**  
**Grizzly Creek Trail**

**CRA:** Grizzly Creek CRA, 6669 acres  
**Status:** New proposed Upper Tier area

Grizzly Creek Trail, from a trailhead (approximately 39.561031, -107.249957) just off I-70 east of Glenwood Springs, offers convenient access into the Grizzly Creek CRA. The trail is a scenic and accessible means of enjoying Glenwood Canyon, and is highlighted by waterfalls and views of colorful canyon walls, showcasing Colorado’s unique geology.

Grizzly Creek itself is an occasionally-run piece of whitewater offering an interesting small-stream contrast to the high-volume sections of the Colorado downstream.

These recreational resources should be protected through Upper Tier designation for the Grizzly Creek CRA.