

OUTDOOR ALLIANCE

May 3, 2019

Jim Hubbard
Undersecretary for Natural Resources and Environment
U.S. Department of Agriculture
20250, 1400 Jefferson Dr. SW
Washington, DC 20024

Dear Undersecretary Hubbard,

On behalf of the human powered outdoor recreation community, we write to express our concern with the State of Utah's petition to the U.S. Forest Service requesting a rulemaking for a state-specific Roadless Rule. Because of the tremendous benefit and importance of the Forest Service Roadless Rule and the lack of explication by the State for the need for modifications, we believe that request should not be accepted.

Outdoor Alliance is a coalition of ten member-based organizations representing the human powered outdoor recreation community. The coalition includes Access Fund, American Canoe Association, American Whitewater, International Mountain Bicycling Association, Winter Wildlands Alliance, The Mountaineers, the American Alpine Club, the Mazamas, Colorado Mountain Club, and Surfrider Foundation and represents the interests of the millions of Americans who climb, paddle, mountain bike, backcountry ski and snowshoe, and enjoy coastal recreation on our nation's public lands, waters, and snowscapes.

Outdoor Alliance Utah (OA Utah) is a state-wide partnership that serves as a platform for members to coordinate their efforts to protect public lands, waters, and snowscapes, and to ensure these places can be experienced in a meaningful and sustainable manner.

Importance of Utah Roadless Areas

The Roadless Rule is an important conservation tool that protects many of our most valued backcountry recreation experiences. Our community values Roadless areas for the opportunities they provide for climbing, hiking, mountain biking, paddling, and backcountry skiing, among other activities. The settings in which these activities occur—and in many ways, the experiences themselves—are protected by the Roadless Rule in a manner that could not occur under other management regimes. While Roadless areas are protected from new development, management prescriptions are less restrictive than in Wilderness, providing important middle-ground management.



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An analysis of GIS data regarding the overlap between Inventoried Roadless Areas (IRAs) and outdoor recreation opportunities in Utah demonstrates how singularly important these protections are for our community. IRAs include more than 1,100 miles of hiking trails, 750 miles of mountain biking trails, and more than 1000 rock climbing routes, and 1.2 million acres of backcountry skiing.¹

Our community values the Roadless Rule because it helps to preserve wild lands across the National Forest System while providing opportunities for recreational activities like mountain biking and winter trail grooming that are not allowed within more restrictive conservation designations. The Roadless Rule also provides significant management flexibility for a variety of types of other multiple use activities. The one activity the Roadless Rule fundamentally prohibits is the extensive road building associated with intensive commercial logging, which is in many instances incompatible with the protection of the myriad other values afforded by Utah National Forests.

Effect of the State's Petition

The State's February 2019 petition for rulemaking articulates a list of forest management challenges and proposes the development a Utah-specific Roadless Rule—to be applied to approximately 79% of existing IRAs—as well as the total elimination of Roadless protections for an additional 9% of IRAs. In contrast to state-specific rules developed for Idaho and Colorado, the proposal does not include the implementation of any “upper tier” protections where management would be more conservation focused than under existing protections.

The State's proposed changes would have the effect of removing important protections for outdoor recreation opportunities in Utah. Under the proposal, approximately 52% of currently protected climbing sites and 79% of currently protected backcountry ski terrain, whitewater paddling, hiking, and mountain biking resources would lose protections, leaving them vulnerable to impacts from more extensive timber harvest that could be carried out under expansive and vague criteria.

Inadequacy of the Petition

The State's petition begins with a recitation of forest management challenges that our community does not dismiss. Problems like climate change adaptation, fire management, and the spread of invasive species are certainly pressing. The petition, however, does not articulate any meaningful connection between the identified problems and the proposed solution—reducing the applicability of Roadless protections.

¹ See attached overview map.



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In contrast, the majority of the identified problems can be addressed under the existing Roadless Rule.²

Moreover, while the State’s connection between the identified management challenges and its proposed remedy is thin, it is nevertheless more robust than the minimal (or nonexistent) analysis offered in support of the State’s proposed site-specific applications. Given the minimal supporting analysis—as well as the general geographic distribution of proposed changes—it seems apparent the site-specific requests are based on political rather forest-health considerations.

While we do not dismiss the importance of public sentiment in the development of management prescriptions, we believe public process should be robust, transparent, and inclusive. In contrast, the public engagement opportunities offered by the State of Utah in the lead up to its petition were limited and cursory. Public meetings included minimal opportunities for the public to actually offer comment, and no official comment period was opened. Outdoor Alliance and Outdoor Alliance Utah shared comments with the Governor’s office in January, but did not receive a response or an opportunity to meet with the Governor or a representative.

* * *

The outdoor recreation community supports the goal of healthy forests and safe nearby communities. We believe that those values are better supported, however, by maintaining the existing Roadless Rule protections for National Forests in Utah. Given that the State has not articulated a meaningful need for changes—let alone demonstrated the viability or benefit of the changes it proposes—we believe the Forest Service should maintain existing protections and decline the State’s petition.

Best regards,

² Our April 18 letter to Secretary Perdue, submitted with Trout Unlimited and other partners, further elaborates on the ways in which the management activities proposed by the State remain available under the existing Roadless Rule.



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cc: Vicki Christiansen, Chief, U.S. Forest Service
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Utah's Roadless Areas and Human-Powered Recreation Resources

- ▲ Rock Climbing
- ▨ Backcountry Ski Zone
- Whitewater Paddling
- Roadless Area
- Trails (Bike, Hike, Ski)
- National Forest

