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RE: Inadequacies of the roadless inventory

July 14, 2011

Dear Forest Service,

This letter supplements comments on the Revised Draft Environmental Impact Statement (RDEIS) and the proposed Colorado Roadless Rule submitted by Rocky Mtn. Wild, et al, on July 13<sup>th</sup>. Section XIII of those comments articulates the need for an accurate inventory. The same section references separate letters with specific details on inventory problems. This letter highlights inadequacies of the Colorado Roadless Area (CRA) inventory on the White River National Forest (WRNF). The letter also suggests improvements and additions to the inventory.

**INTRODUCTION.** For any rule intended to manage and protect roadless areas, it is important to have, with as much precision as possible, an accurate and updated inventory of unroaded lands. We recognize that an inventory of all of Colorado's national forest roadless areas can never be perfect, but we believe much improvement in the current inventory is needed.

In what follows, we describe deficiencies in the roadless inventory used for the proposed Colorado Rule. The boundaries, acreages, and area descriptions used to highlight deficiencies are based on extensive field surveys conducted over the past decade by volunteers following protocols developed by the Southern Rockies Conservation Alliance (SRCA). Field data was analyzed using GIS software. GIS shapefiles with SRCA roadless area boundaries are attached to these comments.

Our own area descriptions should not be considered comprehensive. We attempted to include areas where omissions of roadless acreage is most glaring, as well as some others of slightly lower significance, as capacity and time allowed. These examples are meant to

illustrate the deficiencies in the current WRNF and CRA inventories and to underscore the need for an updated inventory.

One general concern is with roadless areas that overlap two national forests. In some cases, the combined areas do not appear to have been considered in delineating CRA boundaries. By failing to consider together and combine nearby roadless areas on different national forests, the Forest Service missed good opportunities to protect habitat connectivity across managerial/jurisdictional boundaries.

We hope the Forest Service will take a hard look at the inventory gaps we highlight below and add substantial roadless acreage before finalizing a Colorado Roadless Rule. We are happy to work with the Forest Service in any way possible to ensure development and maintenance of the most accurate roadless inventory possible.

**DATA SOURCES.** Acreages and boundary information is based on information from the USDA Forest Service and from the Southern Rockies Conservation Alliance (SRCA). Road and trail numbers are from the 2008 Motor Vehicle Use Maps (MVUM) that were available on the National Forest web site as of October 2008. Where MVUMs were not available, road information was taken from the most up to date National Forest visitor maps, and from GIS data provided by the White River National Forest. Stream and lake information is from the National Forest visitor maps and USGS quads. Vegetation is from the Southwest Regional Gap Assessment Project. Species activities are from the Colorado Division of Wildlife's (CDOW) National Diversity Information Source. Land ownership data is from the CoMap GIS data version 6 dated April, 2007. Threatened and endangered species information is from the Colorado National Heritage Program.

**A. General Problems with the Inventory.** The White River National Forest applied standards too strictly, resulting in the exclusion of some areas altogether and exclusion of many acres of roadless lands from areas that were inventoried. For many areas, roadless boundaries were determined by delineating only those areas that were believed to be defensible as wilderness. We have made this point before, that the WRNF's roadless inventory improperly applied wilderness availability and suitability criteria during the roadless inventory process. A roadless inventory should be based purely on the facts of roadlessness, not subjective opinions about whether such an area, or a certain boundary configuration, can qualify for wilderness designation.

On the White River National Forest, areas with motorized trails and snowmobile uses were excluded from the roadless inventory, even if they contained no roads. Such areas might be difficult to manage as wilderness, but they should still be in the roadless inventory. In some cases, buffers around roads were unjustifiably large, excluding roadless acreage from the inventory.

The Forest Service must include all lands that are roadless in the inventory. We believe approximately 415,000 acres have been excluded.

Citations and quotes in the descriptions below are from the capable and available analyses of potential wilderness areas that were done as part of the forest plan revision.

## **B. Areas Inventoried But Where Roadless Acreage Was Unjustifiably Excluded.**

### **Ashcroft Roadless Area**

Aspen Ranger District

Location: South of Aspen in Castle Creek in Pitkin County

CRA Name: Ashcroft

CRA Acres: 900

2001 Name: Ashcroft

2001 Acres: 900

SRCA Name: Ashcroft

SRCA Acres: 1,300

The Ashcroft Roadless Area is adjacent to the Maroon Bells-Snowmass Wilderness. The 400-acre difference between the WRNF and CRA inventories and the SRCA inventory all lies below 10,000 feet elevation – the line the Forest Service arbitrarily selected as the eastern (lower) boundary of the roadless area, even though at one point it is 500 yards away from and 600 feet above the nearest road. The SRCA inventory started from the Castle Creek Road (Pitkin County CR 15) and took into account any spurs and structures off of the Castle Creek Road, and then properly included everything above those developments as roadless. The Forest Service must revisit this roadless area and redraw its boundaries based on the approach taken by the SRCA inventory.

### **Assignation Ridge Roadless Area**

Sopris Ranger District

Location: Southwest of Carbondale in Pitkin County

CRA Name: Assignation Ridge

CRA Acres: 13,300

2001 Name: Assignation Ridge

2001 Acres: 13,300

SRCA Name: Assignation Ridge

SRCA Acres: 17,700

While the WRNF and CRA inventories agree with the SRCA inventory on the northern, eastern and southern boundaries, they are 1/3 to 2 miles apart on the western boundary. The difference is over their treatment of the Braderich Creek Trail, FST 3-1952.1. The Forest Service wanted to leave this locally popular mountain bike route out of a Forest Plan recommended Wilderness Area, while the SRCA inventory demarcates the actual

extent of the roadless area. To fulfill its own purposes, the CRA inventory needs to adopt the SRCA approach, which will lead to an Assignation Ridge Roadless area that is 30% larger and adjoins the Thompson Creek roadless area.

### **Baldy Mountain Roadless Area**

Rifle Ranger District

Location: South of Silt in Mesa County

CRA Name: Baldy Mountain

CRA Acres: 6,000

2001 Name: Baldy Mountain

2001 Acres: 6,000

SRCA Name: Baldy Mountain

SRCA Acres: 7,300

The WRNF and CRA inventory boundaries contain a cherry-stem for an uninventoried trail, enlarge another to exclude a natural escarpment that looks like a road in an aerial photograph, and truncate its northern boundary at a pipeline with no road along it. The CRA inventory should correct these errors by removing the stem into the western boundary, narrowing the stem around FSR 812.1G and 812.1H, and moving the northern boundary out to FSR 8-800.1 and FSR 8-12.1

### **Basalt Mountain A Roadless Area**

Sopris Ranger District

Location: North of Basalt in Eagle County

CRA Name: Basalt Mountain A

CRA Acres: 14,000

2001 Name: Basalt Mountain A

2001 Acres: 14,000

SRCA Name: Basalt Mountain

SRCA Acres: 14,500

The Basalt Mountain A Roadless Area is adjacent to the Basalt Mountain B Roadless Area. The CRA boundary needs to be brought back to FSR 3-524.1A in the area where the WRNF inventory boundary departs more than  $\frac{1}{4}$  mile north from that road to follow the escarpment at the north end of Basalt Mountain's summit plateau.

### **Basalt Mountain B Roadless Area**

Sopris Ranger District

Location: North of Basalt in Eagle County

CRA Name: Basalt Mountain B

CRA Acres: 7,400

2001 Name: Basalt Mountain B

2001 Acres: 7,400

SRCA Name: Basalt Mountain

SRCA Acres: 13,000

The Basalt Mountain B Roadless Area is adjacent to the Basalt Mountain A Roadless Area and the Lake Christine State Wildlife Area, and should properly be adjoined to the Red Table Roadless Area. The route separating Basalt Mountain B and Red Table (Taylor Creek Road FSR 3-510.1) is permanently closed to vehicular use and cannot be considered a road.

At its northwestern end, the CRA inventory boundary departs  $\frac{3}{4}$  of a mile from the nearest road (FSR 3-524.1). The WRNF eliminated from its inventory an entire roadless area, Basalt Mountain C, which extended westward almost 2 miles from Basalt Mountain B to the national forest boundary. The SRCA inventory includes these areas; its bounds should be adopted to correct this error and give greater protection to this ecologically rich area and its critical wildlife habitat. Also, the boundary with the Red Table needs to be updated.

### **Berry Creek Roadless Area**

Holy Cross Ranger District

Location: North of Avon in Eagle County

CRA Name: Berry Creek

CRA Acres: 8,600

2001 Name: Berry Creek

2001 Acres: 8,600

SRCA Name: Berry Creek

SRCA Acres: 8,800

The WRNF and CRA inventories exclude 200 acres around the spur road FSR 7-700W.2B. There may have been some timber thinning in this area but it is not readily apparent, and there is no reason to exclude this area from the CRA inventory, which needs to be adjusted accordingly.

### **Big Ridge to South Fork A Roadless Area**

Blanco Ranger District

Location: South of Buford, southeast of Meeker along the northern and western boundaries of the Flat Tops Wilderness in Rio Blanco County

CRA Name: Big Ridge to South Fork A

CRA Acres: 35,400

2001 Name: Big Ridge to South Fork A

2001 Acres: 35,300

SRCA Name: Big Ridge – South Fork

SRCA Acres: 37,700

*(Note: The WRNF and CRA inventories use a different boundary line between these adjacent areas than does the SRCA inventory. The SRCA boundary is a short border at*

*(the geographic pinch point along the South Fork of the White River. The WRNF and CRA inventories extend the boundary up the opposite side of the canyon along the Cliff Lakes drainage and one of its tributaries. Acreage numbers, therefore, are not exactly equivalent.)*

The southeastern boundary of Big Ridge to South Fork A is entirely adjacent to the Flat Tops Wilderness, and its southern end is adjacent to the Big Ridge to South Fork B Roadless Area.

The WRNF and CRA inventories exclude six significant portions of national forest land for reasons unrelated to actual roadlessness, such as range improvements, past timber thinning, lack of solitude, and off-road motorized travel. The SRCA boundary is based on inventoried roads and the national forest boundary, and should be used as a model for correcting the CRA boundary in the Big Ridge, Marvine Campground, Yellowhorse, Ute Creek, Crooks Park, Baily Lake, JK Ridge and Hiner Spring areas.

### **Big Ridge to South Fork B Roadless Area**

Blanco Ranger District, with a few acres in the Rifle District

Location: Directly south of Buford. The New Castle-Buford Road (FSR 2-245) runs along its western boundary.

CRA Name: Big Ridge to South Fork B

CRA Acres: 6,000

2001 Name: Big Ridge to South Fork B

2001 Acres: 6,000

SRCA Name: Burro Mountain

SRCA Acres: 14,600

The Big Ridge to South Fork B Roadless Area is adjacent to Big Ridge to South Fork A Roadless Area. *(Note: The SRCA Burro Mountain Roadless Area boundary includes the Hiner Spring area at its southeast end, which is adjacent to the Flat Tops Wilderness Area. The WRNF and CRA boundaries include this area in Big Ridge to South Fork A, so Big Ridge to South Fork B in these inventories doesn't reach to the Flat Tops WA.)*

The Burro Mountain/Greenstreet exclusion from the Big Ridge to South Fork B Roadless Area is large enough to stand as a roadless area on its own, and is totally unjustifiable. The existence of a few off-road vehicle trails within an area in no way disqualifies it from the Roadless Inventory. We note that: the WRNF Pagoda Peak Roadless Area has a major ATV route, the Pagoda Lake Trail (FST 2-1804), running through the heart of it. The forested flanks of Burro Mountain and the mixed forest-grassland plateau that forms its summit are quintessential examples of the Flat Tops landscape – rich in beauty, solitude and forest and wildlife values.

The general boundary for the Big Ridge to South Fork B/Burro Mountain Roadless Area should be the Blair Mountain Road (FSR 601) to the south and the New Castle-Buford

Road (FSR 2-245) to the west, as is the case with the SRCA Burro Mountain Roadless Area.

### **Black Lake East Roadless Area**

Dillon Ranger District

Location: Gore Mountains north of Silverthorne near the Green Mountain Reservoir

CRA Name: Black Lake East

CRA Acres: 700

2001 Name: Black Lake East

2001 Acres: 700

SRCA Name: Black Lake East

SRCA Acres: 1200

The Black Lake East Roadless Area is adjacent to the Eagles Nest Wilderness Area along its southwestern boundary.

The SRCA inventory found an additional 500 acres of contiguous roadless land south of McKinley Gulch and added it to the WRNF inventoried area. Terminating the boundary of the roadless area at McKinley Gulch appears to be entirely arbitrary and the CRA needs to be extended to include the entire SRCA-inventoried area.

### **Blair Mountain Roadless Area**

Rifle Ranger District

Location: Flat Tops Mountains north of Glenwood Springs

CRA Name: Blair Mountain

CRA Acres: 500

2001 Name: Blair Mountain

2001 Acres: 500

SRCA Name: Blair Mountain

SRCA Acres: 1700

The Blair Mountain Roadless Area is adjacent to the Flat Tops Wilderness along its eastern and northern border.

The Blair Mountain Roadless area exemplifies, on a small scale, the difference between applying the “defensible boundary” principle used by the White River National Forest to inventory as roadless only those areas where the terrain itself prevents wilderness-incompatible uses such as snowmobiling and other off-road vehicle use, and inventorying roadless areas based on the existence of roads. The SRCA road-based inventory has over three times the acreage of the WRNF and CRA inventoried area. From southeast to north, the SRCA Blair Mountain Roadless Area is bounded consecutively by: the Blair Overlook (FSR 8-601.2E), Blair Mountain (FSR 8-601.1), Cow Lake (FSR 601.2F), Bench (FSR 8-647.1), FSR 647.1A, and again the 647.1 Roads.

### **Boulder Roadless Area**

Dillon Ranger District

Location: North of Silverthorne in Summit County

CRA Name: Boulder

CRA Acres: 1,300

2001 Name: Boulder

2001 Acres: 1,300

SRCA Name: Boulder

SRCA Acres: 1,500

The Boulder Roadless Area is adjacent to the Eagles Nest Wilderness. The CRA inventory must be adjusted to follow FSR 5-1376.1 and FSR 1376.1D for the full length of its northern boundary, as the SRCA inventory does.

### **Budges Roadless Area**

Eagle Ranger District

Location: Flat Tops Mountains north of Glenwood Springs

CRA Name: Budges

CRA Acres: 1000

2001 Name: Budges

2001 Acres: 1000

SRCA Name: Hunns Peak

SRCA Acres: 6100

The Budges Roadless Area is bordered on its west side by the Flat Tops Wilderness Area. It is a tiny remnant of the RARE II Hunns Peak Roadless Area that was partially logged during the 1980s. But the giant, standing dead beetle-killed spruce that drew loggers to the Flat Tops in the 80's are now gone – cut down or rotted. There will be no more logging on Hunns Peak for decades to come, if ever. The regrowth isn't yet marketable, and the timber roads that cut the area apart are closed, obliterated and fading into the grass. It is time to recover the area to something like its original shape. SRCA incorporated this practical vision into its inventory, and the Forest Service needs to take a closer look at what is actually happening on the ground.

At the very least, the sliver of roadless area called Budges needs to be extended south to the partially obliterated Buck Creek Road (FSR 4-463.1), more than doubling its current size. And if the State of Colorado is serious about protecting functioning roadless areas, it will take the condition of the land at face value and follow the area outlined by SRCA all the way down to Heart Lake, with a western boundary along the Dry Buck Loop (FSR 4-644.1) and the Wagon Wheel (FSR 4-6645.1) Roads, a southern boundary along the Bison Lake (FSR 640.1) and the Blair Mountain (FSR 4-601.1) Roads, and an eastern boundary along the Heart Lake (FSR 4-630.1) and Coffee Pot (FSR 600.1) Roads.

### **Buffer Mountain Roadless Area**

Holy Cross Ranger District

Location: North of Vail in Eagle County

CRA Name: Buffer Mountain

CRA Acres: 11,000

2001 Name: Buffer Mountain

2001 Acres: 11,000

SRCA Name: Buffer Mountain

SRCA Acres: 11,600

The northern boundary of the CRA Buffer Mountain inventory needs to be corrected near the junction of FSR 7-734.1 with FSR 7-787.1. Some logging occurred in this area in the past, but this does not justify its exclusion from the roadless area, and certainly not to the extent of the WRNF inventory's exclusion.

### **Burnt Mountain Roadless Area**

Aspen Ranger District

Location: Between the Snowmass and Buttermilk Ski Areas in Pitkin County

CRA Name: Burnt Mountain

CRA Acres: 1,600

2001 Name: Burnt Mountain

2001 Acres: 1,700

SRCA Name: Burnt Mountain

SRCA Acres: 1,900

The Burnt Mountain Roadless Area is adjacent to the Maroon Bells-Snowmass Wilderness Area. The CRA inventory boundary follows the Management Area 8.25 prescription boundary, rather than the actual ski area development or even the permit boundaries for Buttermilk and Snowmass. This needs to be corrected.

### **Chicago Ridge Roadless Area**

Holy Cross Ranger District

Location: Northeast of Tennessee Pass along US 24 between Leadville and Minturn in Eagle County

CRA Name: Chicago Ridge

CRA Acres: 5,100

2001 Name: Chicago Ridge

2001 Acres: 5,100

SRCA Name: Chicago Ridge

SRCA Acres: 8,400

The WRNF and CRA inventories improperly exclude land to extensively buffer private inholdings and, more importantly, they remove the Ski Cooper cat-skiing area from the inventory. This is inventorying to use rather than character, and needs to be rectified.

The SRCA inventory shows how to properly protect private land and access while maximizing roadless area protection. The SRCA inventory itself needs to be updated to remove cherry-stems for FSR 7-731.1D, which has long been abandoned and allowed to grow over, and for the upper end of 7-731.1, which is fully decommissioned.

### **Crystal River Roadless Area**

Sopris Ranger District

Location: Along the east side of the Crystal River between Carbondale and Marble in Pitkin and Gunnison Counties

CRA Name: Crystal River

CRA Acres: 6,100

2001 Name: Crystal River

2001 Acres: 6,100

SRCA Name: Crystal River

SRCA Acres: 6,300

The Crystal River Roadless Area is bounded on its east side by the Maroon Bells-Snowmass Wilderness Area. It is also adjacent to the Hay Park Roadless Area.

The WRNF and CRA inventories removed an area in Bulldog Creek beyond the end of FSR 3-310.1B from the inventory for no apparent reason. The excluded area is bounded on three sides by designated wilderness and the Crystal River Roadless Area. Only one side abuts private mining claims, and there are no roads or structures to detract from its roadless character. The CRA inventory needs to be amended to correct this omission.

### **Deep Creek Roadless Area**

Eagle Ranger District

Location: North of Dotsero in Eagle and Garfield Counties

CRA Name: Deep Creek

CRA Acres: 9,900

2001 Name: Deep Creek

2001 Acres: 9,900

SRCA Name: Deep Creek

SRCA Acres: 14,700

The WRNF and CRA inventory boundaries for the Deep Creek Roadless Area are a confusing line that follows a road in one place and wanders across the landscape in others, not even following the obvious topographic features, such as a canyon rim, that the Forest Service commonly uses to create a “defensible boundary” for a prospective designated Wilderness Area. We see no reasonable explanation for this boundary. Forest Service policy – and common sense – deems that existing roads are appropriate boundaries for roadless areas. This is the standard that the SRCA inventory followed and that the CRA inventory needs to consistently apply.

In the case of Deep Creek the principal SRCA boundary is very straightforward – Coffee Pot Road (FSR 4-600.1) on the south and Jack Spring Road (FSR 4-618.1) on the north. The SRCA inventory does depart from its standard practice in one instance in Deep Creek by including about 1,000 acres north of FSR 4-618.1E, a closed road that the WRNF classifies as “Not Needed.”

### **Dome Peak Roadless Area**

Eagle Ranger District

Location: Southwest of Yampa, in Routt, Garfield and Eagle Counties

CRA Name: Dome Peak

CRA Acres: 12,000

2001 Name: Dome Peak

2001 Acres: 12,000

SRCA Name: Dome Peak

SRCA Acres: 12,500

The Dome Peak Roadless Area is adjacent to the Flat Tops Wilderness along its western boundary. The WRNF, CRA and SRCA inventories are largely in agreement. However, the WRNF inventory excluded a small area along the northern boundary (presumably to facilitate a future timber sale) and most of the area between the Flat Tops Wilderness and the North Derby Road (FSR 4-610). There is an irrigation ditch departing North Derby Creek near the WRNF/CRA boundary, and while this might be construed to reduce the wilderness value of this section, it in no way impairs its roadless qualities. The CRA boundary should be extended all the way to the WRNF boundary at the north edge of the Dome Peak Roadless Area, and should also include the SRCA extension in the southwest corner of the roadless area.

### **East Divide-Fourmile Roadless Area**

Sopris and Rifle Ranger Districts

Location: Southwest of Glenwood Springs in Garfield and Pitkin Counties

CRA Name: East Divide-Four Mile Park

CRA Acres: 8,700

2001 Name: East Divide-Four Mile Park

2001 Acres: 8,700

SRCA Name: Fourmile East Divide

SRCA Acres: 10,000

The WRNF and CRA inventories exclude significant acreage in the Park Creek/Mancon Park area for no good reason. There has been logging in the Park Creek area, but not nearly to the extent of the excluded area. The roadless area boundary here needs to follow the roads – specifically FSR 3-320.1C and FSR 3-300.1P. The SRCA boundary needs to be adjusted here as well – the WRNF remapped 320.1C much further south than in the road inventory used for the SRCA boundary. And on the west side of the roadless area,

the route designated as 8-801.1M is in fact a fence line that should be absorbed into the roadless area boundary.

### **East Vail Roadless Area**

Holy Cross Ranger District

Location: Southeast of Vail along Interstate 70 and the south side of the Vail Ski Area in Eagle County

CRA Name: East Vail

CRA Acres: 8,000

2001 Name: East Vail

2001 Acres: 8,000

SRCA Name: East Vail

SRCA Acres: 9,900

The WRNF and CRA inventory boundaries for East Vail were arbitrarily truncated at the east end of Battle Mountain. The SRCA inventory includes the entire area between the Vail Ski Area permit boundary and FSR 7-745.1, and between FSR 7-745.1 and FSR 7-770.1A down to the Shrine Pass Road FSR 7-709.1. There is no cause for the CRA inventory to exclude this large roadless acreage, with its significant wildlife and scenic value, from its inventory.

### **East Willow Roadless Area**

Rifle Ranger District

Location: South of Silt in Mesa County

CRA Name: East Willow

CRA Acres: 7,100

2001 Name: East Willow

2001 Acres: 7,100

SRCA Name: East Willow

SRCA Acres: 8,100

The East Willow Roadless Area is adjacent to the Thompson Creek Roadless Area on the White River National Forest and to the Clear Fork and Turner Creek roadless areas on the Gunnison National Forest.

The SRCA inventory includes 1,000 acres south of the closed road FSR 8-268.1. The CRA inventory needs to look at the long-term status of this road – if it is to be decommissioned or permanently downgraded to trail status, the inclusion of the area would greatly enhance the integrity of the 100,000 plus acres of linked roadless areas in this area of vital wildlife habitat and migration corridors.

### **Elk Creek B Roadless Area**

Rifle Ranger District

Location: Flat Tops Mountains north of New Castle

CRA Name: Elk Creek B

CRA Acres: 7200

2001 Name: Elk Creek B

2001 Acres: 7200

SRCA Name: Elk Creek

SRCA Acres: 43,600

Here the Forest Service took 40,000 acres of contiguous roadless land and turned it into a 7200-acre “roadless area” by taking the defensible boundary principle to a ridiculous extreme. The Elk Creek B Roadless Area doesn’t even attempt to encompass all of the Elk Creek watershed’s canyons – only their deepest and darkest parts. By strictly following the roads bounding these canyons and allowing for some 20 cherry stem spur roads in toward them, the SRCA inventory found a 43,600 acre area free of roads – an area just over six times the size of the official roadless inventory. The CRA inventory boundary needs to follow what is on the ground here, and not use the Forest Service’s defensive approach to Wilderness designation. From East Elk Creek counterclockwise to Main Elk Creek the following roads form the outer boundary of the SRCA Elk Creek Roadless Area: 8-603.1, 8-603.1M, 8-651.1, 8-601.1, 8-648.1, 8-648.1C, 8-648.1B, 8-823.2B, 8-821.1E, 8-821.1, 8-821.1B, 8-601,4D, 8-601.1 (again), 8-N210.1, 2-245.1, 8-245.1.

### **Elliot Ridge Roadless Area**

Holy Cross and Dillon Ranger Districts

Location: West of Green Mountain Reservoir in Summit and Eagle Counties.

CRA Name: Elliot Ridge

CRA Acres: 3100

2001 Name: Elliot Ridge

2001 Acres: 3200

SRCA Name: Elliot Ridge

SRCA Acres: 4700

The Elliot Ridge Roadless Area is bordered on the south by the Eagles Nest Wilderness Area. The WRNF and CRA inventories systematically exclude land on the east side of Elliot Ridge along the Upper Spring Creek Road (FSR 5-1834.1) and the Spring Creek Road (FSR 5-1831.1) that may not be pristine but are roadless. Likewise the area north of the Mahan Lake Trail (FST 1831.1A) has seen some logging activity but old logging roads are revegetated or re-vegetating. The area is roadless. The CRA inventory needs to accept the SRCA identified boundaries in these areas and use the actual roads along the northern boundary of the Elliot Ridge area as its own demarcations.

### **Fawn Creek-Little Lost Park Roadless Area**

Blanco Ranger District

Location: North of Buford in Rio Blanco County

CRA Name: Fawn Creek-Little Lost Park

CRA Acres: 5400

2001 Name: Fawn Creek-Little Lost Park

2001 Acres: 5500

SRCA Name: Fawn Creek

SRCA Acres: 6900

Fawn Creek-Little Lost Park is separated from the much larger Morapos Roadless Area by Forest System Roads 2-290.1 and 2-250.2. There is a significant difference between the SRCA inventory and the WRNF and CRA inventories, as the WRNF excludes the western portion of the area due to the absence of “an identifiable and manageable boundary” for successful management as a wilderness area. The WRNF inventory also noted evidence of past mining and logging activity and was too close to existing roads and motorized activity. The CRA boundary should amend this arbitrary decision by the WRNF by extending the western boundary all the way to East Beaver-Yellow Jacket Road 2-250.2 at the northwest end, and to the Pole Patch Trail 2-2271 and the Fawn Creek Road 2-280.1 for the southern boundary.

### **Freeman Creek Roadless Area**

Holy Cross Ranger District

Location: North of Vail in Eagle County

CRA Name: Freeman Creek

CRA Acres: 1,000

2001 Name: Freeman Creek

2001 Acres: 1,000

SRCA Name: Freeman Creek

SRCA Acres: 1,300

The Freeman Creek Roadless Area is adjacent to the Eagles Nest Wilderness Area. The SRCA inventory includes several hundred acres of wetland habitat along Freeman Creek between FSR 7-700.1 and FSR 7-701.1 that are not included in the WRNF and CRA inventories. The only plausible reason for this omission is that the Forest Service could not defend this area from snowmobile use, so it chose to pretend that it isn’t roadless. For the purposes of the CRA inventory this valuable habitat needs to be added to its boundary for the Freeman Creek Roadless area.

### **Gallo Hill Roadless Area**

Sopris Ranger District

Location: North of Marble in Gunnison County

CRA Name: Big Ridge to South Fork A

CRA Acres: 1,400

2001 Name: Gallo Hill

2001 Acres: 1,300

SRCA Name: Gallo Hill

SRCA Acres: 1,600

The Gallo Hill Roadless Area is bordered on its north side by the Maroon Bells-Snowmass Wilderness Area. The southern boundary of the WRNF-inventoried Gallo Hill Roadless Area was arbitrarily drawn back from the national forest boundary to create an irregular and inconsistent buffer between the inventoried area and adjoining private property. This boundary is contrary to agency policy and irrelevant to the purposes of the CRA inventory. The boundaries of the CRA area need to be redrawn to follow the public land boundary, as was the SRCA inventory boundary.

### **Game Creek Roadless Area**

Holy Cross Ranger District

Location: South Vail in Eagle County

CRA Name: Game Creek

CRA Acres: 6,100

2001 Name: Game Creek

2001 Acres: 6,900

SRCA Name: Game Creek

SRCA Acres: 7,100

The CRA inventory presupposes an expansion of the Vail Ski Area into the Game Creek watershed because of a White River National Forest Plan management prescription allowing for it, and removed 800 acres from its roadless area boundary. This acreage needs to be reinstated.

### **Grizzly Creek Roadless Area**

Eagle and Rifle Ranger Districts

Location: North of Glenwood Canyon in Garfield County

CRA Name: Grizzly Creek

CRA Acres: 6,700

2001 Name: Grizzly Creek

2001 Acres: 6,600

SRCA Name: Grizzly Creek

SRCA Acres: 43,100

The WRNF-inventoried Grizzly Creek Roadless Area is a paltry reflection of the magnificent expanse of wild land that actually exists in this southeastern corner of the Flat Tops. Reasons for the 85% reduction in acreage are not at all justified. On the western (Rifle Ranger District) side, acreage was removed to facilitate a proposed timber sale that never went through. On the Eagle RD side, the Forest Service declared that there was insufficient opportunity for solitude and that noise from Interstate 70 and the Rio Grande & Western rail line was audible throughout the area, portions of which are more than 7 miles from the interstate and most of which is more than a mile from any well-traveled road. That same district office found no such problems on the opposite side

of Glenwood Canyon, where it drew the boundary for the Little Grand Mesa Roadless Area right down to the railroad tracks.

In any event, the goal of the CRA is not to create the ideal Wilderness Area but to document the full extent of roadless lands remaining within Colorado's national forest. The SRCA inventory of the Grizzly Creek area is well suited to this purpose. The area is outlined by Interstate 70 on the south, the Forest boundary on the east, the Coffee Pot Road (FSR 4-600.1) on the north, and the Grizzly Jeep Road (FSR 8-632.1) and the Transfer Trail (FSR 8-602.1) on the west. At a maximum of 11 miles east-west and north-south, the area contains 3 Colorado Natural Heritage Program (CNHP) Potential Conservation Areas (PCAs): No Name Creek (Very High Biodiversity Significance), Grizzly Creek (High Biodiversity Significance), and Hanging Lake (Very High Biodiversity Significance). About half of the No Name and a quarter of the Grizzly Creek PCAs are covered by the CRA inventory area. Hanging Lake is 2½ miles outside of the proposed CRA.

### **Gypsum Creek Roadless Area**

Eagle Ranger District

Location: South of Gypsum in Eagle County

CRA Name: Gypsum Creek

CRA Acres: 17,900

2001 Name: Gypsum Creek

2001 Acres: 17,900

SRCA Name: Gypsum Creek

SRCA Acres: 17,900

The Gypsum Creek Roadless Area and the Red Table Roadless Area are being managed as Recommended Wilderness by the White River National Forest. With the conversion of the road that once separated them into a trail, they are now one continuous, uninterrupted roadless area.

While the CRA inventory and the SRCA inventory cover the same number of acres, there are significant differences in the boundaries. The CRA inventory includes 900 acres west of the Suicide Mountain Jeep Road (FSR 464W.2N), which the White River National Forest lists as open to all vehicles, and instead uses the Old Man's Road (FSR 430.1B) in combination with several motorized and non-motorized trails as a boundary. The SRCA inventory of the area does not include these 900 acres but does include comparable acreage that the CRA inventory excludes by drawing its boundary to the rims of the glacial cirques on the north side of Red Table Mountain rather than following the roads along the relatively flat top of the ridge.

The SRCA members who monitor the White River National Forest have repeatedly recommended that the Suicide Mountain Jeep Trail be decommissioned and restored because it is un-maintained and very badly eroded. The point here, however, is that the

CRA inventory needs to use FSR 514 and FSR 464 along the top of the ridge as its southern boundary and FSR 464W.2N as its western boundary.

### **Hay Park Roadless Area**

Sopris and Aspen Ranger Districts

Location: South of Carbondale in Pitkin County

CRA Name: Hay Park

CRA Acres: 11,100

2001 Name: Hay Park

2001 Acres: 11,100

SRCA Name: Hay Park

SRCA Acres: 11,700

In this case, even the SRCA inventory must be updated. All three of these inventories misclassify FDT 1957.2A, which enters the area near its northeast corner, as a road rather than the trail it is. The CRA and SRCA inventories need to be amended to reflect the true status of this route. The WRNF and CRA inventories also have a cherry-stem running southeast ½ mile past Dinkle Lake when in fact the route (FSR 3-311.1) ends at the lake.

### **Homestake Roadless Area**

Holy Cross Ranger District

Location: South of Minturn in Eagle County

CRA Name: Homestake

CRA Acres: 4,100

2001 Name: Homestake

2001 Acres: 4,100

SRCA Name: Homestake

SRCA Acres: 4,200

The Homestake Roadless Area is adjacent to the Holy Cross Wilderness Area and to the No Name Roadless Area. The FSR 7-705.1M spur off of 7-705.1 has been permanently closed to vehicles and is now a trail. Because of this change in status, the Homestake and No Name Roadless Areas now adjoin. The CRA inventory needs to be updated to reflect this change.

### **Hoosier Ridge Roadless Area**

Dillon Ranger District

Location: South of Breckenridge in Summit County

CRA Name: Hoosier Ridge

CRA Acres: 6,100

2001 Name: Hoosier Ridge

2001 Acres: 6,100

SRCA Name: Hoosier Ridge  
SRCA Acres: 6,000

The WRNF/CRA Hoosier Ridge Roadless Area is adjacent to the SRCA-inventoried Hoosier Ridge Roadless Area on the Pike-San Isabel National Forest.

### **Housetop Mountain Roadless Area**

Rifle Ranger District  
Location: South of De Beque in Mesa County  
CRA Name: Housetop Mountain  
CRA Acres: 12,700  
2001 Name: Housetop Mountain  
2001 Acres: 12,700  
SRCA Name: Housetop Mountain  
SRCA Acres: 17,100

The Housetop Mountain Roadless Area adjoins the Mamm Peak Roadless Area on the White River National Forest and the Sunnyside Roadless Area on the Grand Mesa National Forest.

The WRNF inventory of the Housetop Mountain Roadless Area excludes approximately 2000 acres based on the possibility of incursions by off-road vehicles arriving through private lands with no public access easements. Such fears seem hardly justified, and furthermore, they are in no way applicable to a roadless area inventory.

There are also approximately 2000 acres of roadless national forest land between the Housetop Mountain and Mamm Peak Roadless Areas that need to be allocated to one roadless area or the other. In fact, only a non-motorized trail separates these two areas - the WRNF and CRA inventories are clearly deficient here.

The SRCA inventory includes areas excluded around the perimeter for potential, future ORV incursions and the roadless land between the Housetop and Mamm Peak Roadless Areas. The CRA inventory needs to follow suit.

### **Hunter Roadless Area**

Aspen Ranger District  
Location: Directly northeast of Aspen in Pitkin County  
CRA Name: Hunter  
CRA Acres: 1,100  
2001 Name: Hunter  
2001 Acres: 1,100  
SRCA Name: Hunter  
SRCA Acres: 3,000

The Hunter Roadless Area is adjacent to the Hunter-Fryingpan Wilderness Area. The WRNF inventory of this area was once again based upon what the agency considers a defensible wilderness area boundary, not a roadless area boundary. The closest road to the northern boundary of the WRNF and CRA inventoried area is  $\frac{3}{4}$  mile away on the far side of the Hunter Creek Valley. The only possible threat to the inventoried area is the mountain bikers who are allowed to ride on designated trails in roadless areas, but this activity does not adversely affect roadless area characteristics and should not affect the inventory. The northern boundary of the SRCA area is formed by Pitkin County Road 20.A3 and FSR 1-130.1A, which run through Van Horn Park on the north side of Hunter Creek. This roadless area includes Hunter Creek and the remarkable willow wetlands included in the Colorado Natural Heritage Program's (CNHP) Hunter Creek Potential Conservation Area (PCA).

Since inventories were conducted by the WRNF and SRCA, Pitkin County has made a route use changes that make most of the Hunter Creek Valley a roadless area. The Smuggler Cutoff Road (Pitkin County 21.A1) has been permanently closed to four wheel traffic, making the whole north side of Smuggler Mountain and another  $\frac{3}{4}$  mile of the valley floor roadless.

All three roadless area inventories need to be updated to reflect recent changes.

### **Little Grand Mesa Roadless Area**

Sopris Ranger District

Location: East of Glenwood Springs on the south side of Glenwood Canyon in Garfield County

CRA Name: Little Grand Mesa

CRA Acres: 6,500

2001 Name: Little Grand Mesa

2001 Acres: 6,500

SRCA Name: Little Grand Mesa

SRCA Acres: 7,800

For unknown reasons, the WRNF inventory excluded approximately 1000 acres between Bear Creek and the Forest boundary  $1\frac{1}{4}$  mile to the west from the inventory. There are no developments or uses within this area to justify its exclusion from the inventory, and the CRA inventory needs to correct this USFS oversight. About half of the CNHP Bear Creek PCA (High Biodiversity Value) is in the SRCA-inventoried roadless area but less than half of that segment is covered by the current CRA boundary. The Hubbard Cave PCA (General Biodiversity Value) is in all three inventories.

### **Lower Piney Roadless Area**

Holy Cross Ranger District

Location: North of Avon in Eagle County.

CRA Name: Lower Piney

CRA Acres: 13,400  
2001 Name: Lower Piney  
2001 Acres: 13,400  
SRCA Name: Lower Piney River  
SRCA Acres: 23,500

The Lower Piney Roadless Area is bounded on the east by the Eagles Nest Wilderness Area. The WRNF and CRA inventories severely under-report the extent of roadless lands in the ecologically vital Lower Piney River-Piney Ridge region. Inventories should include the 3000 contiguous acres north of Chimney Rock between FS 753W.1 and FS 401.1E as well as the 4600 acres on the west side of the Cottonwood Peak Road (FSR 784.1) and north of the Box Canyon “Road” (FSR 7-404.1)—which disappears into the grass just north of Lost Lake. Hunters know well how rich this area is in wildlife and biologists recognize its importance too – it is an essential link between the southern and northern portions of the Gore Range and between the White River and Routt National Forests.

The CRA needs to take a hard look at the limits of the WRNF inventory and incorporate the major excluded areas identified in the SRCA inventory.

### **Mamm Peak Roadless Area**

Rifle Ranger District  
Location: South of Rifle in Garfield and Mesa Counties  
CRA Name: Mamm Peak  
CRA Acres: 25,400  
2001 Name: Mamm Peak  
2001 Acres: 25,300  
SRCA Name: Mamm Peak  
SRCA Acres: 26,600

The Mamm Peak Roadless Area on the WRNF adjoins the Battlements Roadless Area on the Grand Mesa National Forest. There are approximately 2000 acres of roadless national forest land in the Wallace Creek drainage between the Mamm Peak Roadless Area and Housetop Mountain Roadless Area that were excluded for no apparent reason – other than perhaps some off-road travel. Nor does the current WRNF road and trail inventory show an existing route to support the cherry-stemmed road extending from the northern forest boundary south and west up Bear Gulch. This route forms the westernmost boundary of the Mamm Peak Roadless Area. The CRA inventory boundary needs to be corrected to reflect this change in the base information and to connect these two major roadless areas.

### **Maroon East Roadless Area**

Aspen Ranger District  
Location: South of Aspen in Pitkin County

CRA Name: Maroon East  
CRA Acres: 1,400  
2001 Name: Maroon East  
2001 Acres: 1,400  
SRCA Name: Maroon East  
SRCA Acres: 1,700

The Maroon East Roadless Area is adjacent to the Maroon Bells-Snowmass Wilderness Area. The WRNF and CRA inventories exclude the Maroon Bowl portion of the Highlands Ski Area. There will never be a ski lift in this high-avalanche danger, out of bounds expert-only bowl. So unless ski patrol avalanche control work isn't allowed in roadless areas, this piece of wild mountainside needs to be added to the CRA inventory. Olympic Bowl, just north of Maroon Bowl, is also excluded from the CRA inventory for no apparent reason. These areas should be added to the CRA inventory.

### **Maryland Creek Roadless Area**

Dillon Ranger District  
Location: North of Silverthorne in Summit County  
CRA Name: Maryland Creek  
CRA Acres: 1,500  
2001 Name: Maryland Creek  
2001 Acres: 1,500  
SRCA Name: Maryland Creek  
SRCA Acres: 1,700

The Maryland Creek Roadless Area is adjacent to the Eagles Nest Wilderness Area. There is a buffer as if for a roadway between the southern boundary of the CRA and the Wilderness boundary that needs to be corrected.

### **McFarlane Creek Roadless Area**

Aspen Ranger District  
Location: South of Aspen in Pitkin County  
CRA Name: McFarlane Creek  
CRA Acres: 1,400  
2001 Name: McFarlane Creek  
2001 Acres 1,400  
SRCA Name: McFarlane Creek  
SRCA Acres: 2,300

The McFarlane Creek Roadless Area is bordered on its eastern side by the Collegiate Peaks Wilderness Area. The WRNF and CRA inventory boundaries for the western side of this roadless area are generalized and incomplete. Specifically, they do not track the private inholdings along the top of Richmond Hill that actually bound the roadless national forest land on the east side of the mountain. The SRCA inventory boundary

consistently follows the Aspen Mountain Ski Area boundary, the private parcel boundaries and the Richmond Hill Road (CR 15.E). The CRA inventory boundary should do likewise, and can also eliminate an unnecessary cherry-stem in the SRCA area for the McFarlane Creek Trail, a non-motorized route where it enters the roadless area.

### **Meadow Mountain A Roadless Area**

Holy Cross Ranger District

Location: South of Avon in Eagle County

CRA Name: Meadow Mountain A

CRA Acres: 1,600

2001 Name: Meadow Mountain A

2001 Acres: 2,100

SRCA Name: Meadow Mountain A

SRCA Acres: 2,600

The Meadow Mountain A Roadless Area is bordered on its south side by the Holy Cross Wilderness Area. The CRA inventory excludes the McCoy Park area – a cross-country ski area with no permanent roads – for no practical reason. The eastern boundary of the CRA inventory needs to be moved to the ski area road FSR 7-738.2A. There are also an additional 380 contiguous acres west of East Lake Creek documented in the SRCA inventory that need to be added to the CRA inventory to accurately reflect the roadless character on the national forest lands bordering the Holy Cross Wilderness Area.

### **Meadow Mountain B Roadless Area**

Holy Cross Ranger District

Location: South of Avon in Eagle County

CRA Name: Meadow Mountain B

CRA Acres: 3,100

2001 Name: Meadow Mountain B

2001 Acres: 3,100

SRCA Name: Meadow Mountain B

SRCA Acres: 8,900

The Meadow Mountain B Roadless Area is bordered on its south side by the Holy Cross Wilderness Area. The WRNF clearly constructed the boundary of Meadow Mountain B to be only an easily managed addition to the Holy Cross Wilderness. This doesn't begin to reflect the true roadless nature of this critical wildlife area and scenic mountainside. The SRCA inventory boundary follows the roads, the private land, and ski area boundaries and properly shows the extent of roadless land in the area.

### **Morapos Roadless Areas A & B**

Blanco Ranger District

Location: East of Meeker, north of Buford in Rio Blanco County

CRA Names: Morapos A and Morapos B

CRA Acres: 23,600 and 14,000

2001 Names: Morapos A and Morapos B

2001 Acres: 23,600 and 14,100

SRCA Name: Morapos (Milk Creek)

SRCA Acres: 39,000 combined.

There are no adjacent wilderness areas, but the Morapos Roadless Areas are adjacent to the 57,700 (CRA) acre Pagoda Peak Roadless Area on the Routt National Forest, which in turn is adjacent to the 9,200 (CRA) acre Pagoda Peak Roadless Area on the White River National Forest. Additionally the SRCA-inventoried Milk Creek Roadless Area is contiguous with the Morapos A Roadless Area on the west and adds 5000 acres.

Altogether this roadless region is about 109,500 acres – one of the largest non-wilderness roadless areas in the state of Colorado, almost all of which is mid-elevation forest and grassland.

The SRCA inventory adds to the WRNF and CRA inventories land along the Moeller Creek Road 2-290.1 where the WRNF arbitrarily adjusted a boundary, and along the East Beaver-Yellow Jacket Road 2-250.2. It adds land that was previously logged and eliminates a few boundary cherry-stems for routes not open to large vehicle travel. The CRA inventory could be easily amended by using the above routes for the southern boundary and including all travel routes not open to full-size vehicles.

The WRNF inventory on which the CRA inventory is based separated the Morapos roadless region into two roadless areas based solely on management considerations; the SRCA inventory combines them into one.

### **Mormon Creek Roadless Area**

Sopris Ranger District

Location: East of Basalt in the Upper Fryingpan River Valley in Pitkin County

CRA Name: Mormon Creek

CRA Acres: 3,000

2001 Name: Mormon Creek

2001 Acres: 3,000

SRCA Name: Mormon Creek

SRCA Acres: 4,400

The Mormon Creek Roadless Area is bordered by the Holy Cross Wilderness Area on its northern and eastern sides.

The WRNF inventory made unnecessary exclusions at the north end of this area for water diversion structures that might seem out of place within a designated Wilderness, but do not affect the roadless character of the area – the concrete structures were constructed via and serviced through the same underground tunnel system that channels the water under the Continental Divide to the Arkansas River. Additionally, the SRCA inventory

identified 1000+ acres of roadless land extending southward from the Mormon Creek Roadless Area along the west side of the Holy Cross Wilderness that need to be added to the CRA inventory.

### **North Elk Roadless Area**

Blanco Ranger District

Location: South of Buford on the west side of the New Castle-Buford Road (FSR 2-245), in Rio Blanco and Garfield Counties.

CRA Name: North Elk

CRA Acres: 9,900

2001 Name: North Elk

2001 Acres: 10,000

SRCA Name: North Elk

SRCA Acres: 18,900

The North Elk Roadless Area is separated by a single road from several of the SRCA-inventoried roadless areas (Burro Mountain, Elk Creek and Three Forks) but directly adjacent to none.

Only three short segments of the WRNF/CRA Roadless Area boundary are drawn to an actual road. One shorter segment follows a private property boundary. Most of the northern boundary follows an ATV trail along the East Fork of North Elk Creek. The vast majority of this “roadless area” boundary follows canyon rims formed by the East, Middle and West Forks of North Elk Creek. A more proper and accurate roadless area boundary for the North Elk landscape would be generally bounded by: private land to the north and northwest; segments of the Widow Springs Road (FSR 2-212) and Wear Park Road (FSR 2-214) to the west; the Bar HL (FSR 2-211), Newcastle-Buford (FSR 2-245), Elk Ridge (FSR 2-248), North Elk Cutoff (FSR 2-248) Roads to the South; and the Newcastle Buford Road again to the east. A few extant and necessary system spur roads would need to be cherry-stemmed into this overall boundary.

### **North Independent A Roadless Area**

Aspen Ranger District

Location: East of Aspen, along north side of State Highway 82 in Pitkin County

CRA Name: North Independent A

CRA Acres: 4,500

2001 Name: North Independent A

2001 Acres: 4,500

SRCA Name: North Independence A

SRCA Acres: 6,700

The North Independent A Roadless Area is bordered on its northern side by the Hunter-Fryingpan Wilderness Area. The WRNF inventory of this area created an excessive, unnecessary, and arbitrary buffer along the roads that bound the area – up to ½ mile along

the Smuggler Mountain Road (Pitkin County 21.1) at its north end, and up to  $\frac{1}{4}$  mile along State Highway 82 along most of its extensive southern boundary. Additionally, it excluded all the roadless land around and east of the Lost Man Reservoir. The SRCA inventory properly documented all of this land and the CRA inventory needs to do the same.

### **North Woody Roadless Area**

Aspen Ranger District

Location: Northwest of Aspen in Pitkin County

CRA Name: North Woody

CRA Acres: 8,500

2001 Name: North Woody

2001 Acres: 8,500

SRCA Name: North Woody

SRCA Acres: 10,000

The WRNF and CRA inventories failed to include all plainly contiguous unroaded and unlogged areas in the Woody Creek, Little Woody Creek, and Collins Creek watersheds that comprise the North Woody Roadless Area. The CRA inventory boundary needs to be extended to match the SRCA North Woody boundary in order to give a complete and accurate accounting of the actual size and shape of this roadless area.

### **Pagoda Peak Roadless Area**

Blanco Ranger District

Location: East of Buford on Rio Blanco County border with Routt County and with the Routt NF boundary, northwest of Ripple Creek Pass

CRA Name: Pagoda Peak

CRA Acres: 9200

2001 Name: Pagoda Peak

2001 Acres: 9200

SRCA Name: Pagoda Peak

SRCA Acres: 9300

There are no wilderness areas adjacent to the WRNF Pagoda Peak Roadless Area. However, this area is contiguous with the 57,700 (CRA) acre Routt NF Pagoda Peak Roadless Area, which in turn is contiguous with the 37,700 (WR) acre Morapos A & B Roadless Areas, and the Morapos A Roadless Area is contiguous with the SRCA-inventoried 5000 acre Milk Creek Roadless Area. Altogether this roadless region constitutes 109,500 acres – one of the largest non-Wilderness roadless areas in the state of Colorado, almost all of which is mid-elevation forest and grassland.

The differences between the SRCA and WRNF/CRA acreages for the Pagoda Peak Roadless Area are due to the WRNF arbitrarily excluding land along Rio Blanco County Road 8 because it lacked what the WRNF deemed proper “wilderness” characteristics –

not because it contained roads or other man-made features. The CRA inventory should be amended to use the actual County Road 8 and any Forest System road spurs maintained for full-size vehicle use as its area boundary rather than arbitrary lines drawn by the WRNF to depict a sense of what might constitute a proper wilderness boundary.

### **Piney Lake Roadless Area**

Holy Cross Ranger District

Location: North of Vail in Eagle County

CRA Name: Piney Lake

CRA Acres: 900

2001 Name: Piney Lake

2001 Acres: 900

SRCA Name: Piney Lake

SRCA Acres: 2,200

The Piney Lake Roadless Area is adjacent to the Eagles Nest Wilderness Area. The WRNF and CRA inventory boundaries are crudely and arbitrarily drawn to exclude over 1,000 acres of clearly roadless land, including 3 miles of Red Sandstone Creek and its tributaries, and the associated riparian areas. The CRA inventory boundary needs to be amended to correct this shortcoming, as outlined by the SRCA inventory.

### **Porcupine Peak Roadless Area**

Dillon Ranger District

Location: East of Dillon in Summit County

CRA Name: Porcupine Peak

CRA Acres: 7,700

2001 Name: Porcupine Peak

2001 Acres: 8,700

SRCA Name: Porcupine Peak

SRCA Acres: 9,500

The Porcupine Peak Roadless Area is adjacent to the Mount Sniktau Roadless Area on the Arapaho National Forest. The WRNF inventory boundary excludes 800 acres of roadless and unpermitted land around the Arapahoe Basin Ski Area, and the CRA inventory excludes 1800 such acres.

### **Ptarmigan A Roadless Area**

Dillon Ranger District

Location: North and east of Silverthorne in Summit County

CRA Name: Ptarmigan A

CRA Acres: 2,700

2001 Name: Ptarmigan A

2001 Acres: 2,700

SRCA Name: Ptarmigan A  
SRCA Acres: 4,100

The Ptarmigan A Roadless Area is bordered by the Ptarmigan Wilderness Area along the latter's entire western boundary. The WRNF and CRA inventory boundaries fail to include 1400 acres of contiguous roadless lands further north along the western boundary of the Ptarmigan Wilderness. There is no valid reason for this exclusion in the inventory, and these lands, as shown in the SRCA inventory, must be added to the CRA in order to make it complete. The western and northern boundary of this part of the SRCA-inventoried area is formed by the same utility corridor and the same type of large ranch properties that form the western boundary of the current CRA inventory area.

### **Ptarmigan B Roadless Area**

Dillon Ranger District  
Location: North of Silverthorne in Summit County  
CRA Name: Ptarmigan B  
CRA Acres: 1,800  
2001 Name: Ptarmigan B  
2001 Acres: 1,800  
SRCA Name: Ute Pass  
SRCA Acres: 2,500

The Ptarmigan B Roadless Area is bordered on its southern side by the Ptarmigan Wilderness Area and by the Williams Fork Ptarmigan Adjacent Roadless Area on the Arapahoe-Roosevelt National Forest to the east. In the SRCA inventory, it is also adjacent to the Acorn Creek (Ptarmigan C) Roadless Area to the south.

The western boundary of the Ptarmigan B Roadless Area is an arbitrary line between selected USGS benchmarks  $\frac{1}{2}$  mile and more from the Forest boundary. All of this excluded land is just as roadless as the land included in the CRA and WRNF inventories. Additionally, there is a 1/2 –mile deep arc excluded from the northern boundary along the Ute Pass Road (CR 15) that may contain some abandoned logging roads, but no current system roads. The CRA inventory must be extended to the forest boundary on the west and the county road on the north in order to fully and accurately reflect the actual extent of this roadless area.

### **Ptarmigan C Roadless Area**

Dillon Ranger District  
Location: North of Silverthorne in Summit County  
CRA Name: Ptarmigan C  
CRA Acres: 900  
2001 Name: Ptarmigan C  
2001 Acres: 900  
SRCA Name: Acorn Creek

SRCA Acres: 1,700

The Ptarmigan C Roadless Area is bordered on its eastern side by the Ptarmigan Wilderness Area, and in the SRCA inventory is also adjacent to the Ute Pass (Ptarmigan B) Roadless Area to the north.

The western boundary of the Ptarmigan C Roadless Area is an arbitrary line between selected USGS benchmarks up to  $\frac{3}{4}$  mile and more from the Forest boundary. All of this excluded land is just as roadless as the included land. The CRA inventory must be extended to the forest boundary on the west in order to fully and accurately reflect the actual extent of this roadless area.

### **Ptarmigan Hill A Roadless Area**

Holy Cross Ranger District

Location: South Vail Pass in Eagle County

CRA Name: Ptarmigan Hill A

CRA Acres: 13,100

2001 Name: Ptarmigan Hill A

2001 Acres: 13,100

SRCA Name: Ptarmigan Ridge

SRCA Acres: 13,600

The Ptarmigan Hill A Roadless Area is bordered on the east by the Ptarmigan B Roadless Area.

### **Ptarmigan Hill B Roadless Area**

Dillon Ranger District

Location: West of the Copper Mountain Ski Area in Summit County

CRA Name: Ptarmigan Hill B

CRA Acres: 7,000

2001 Name: Ptarmigan Hill B

2001 Acres: 7,700

SRCA Name: Ptarmigan Ridge

SRCA Acres: 10,500

The Ptarmigan Hill B Roadless Area is bordered on the west by the Ptarmigan A Roadless Area. Near its southern end, the eastern boundary of the CRA departs from its shared boundary with the Ptarmigan A Roadless Area at Searle Pass, runs east-northeast up a ridge to Point 12,596 on Jacque Ridge, then northward down to the bottom of Guller Creek and thence northeast to the Forest Boundary. This excluded area of wild alpine terrain includes 700 acres prescribed in the Revised Forest Plan for ski area development plus some 2,700 acres of alpine ridges and valleys, half of which are within the CNHP Elk Mountain PCA (High Biodiversity Value). All of this acreage needs to be restored or

added to the CRA inventory in order to fully and accurately reflect the actual extent of this roadless area.

### **Red Dirt A Roadless Area**

Eagle Ranger District

Location: North of Dotsero, off the Eagle County Colorado River Road (CR 301) in Eagle County, with a few acres at the west end in Garfield County.

CRA Name: Red Dirt A

CRA Acres: 10, 200

2001 Name: Red Dirt A

2001 Acres: 10,200

SRCA Name: Red Dirt

SRCA Acres: 12,900

The Red Dirt A Roadless Area is adjacent to the Flat Tops Wilderness along its western boundary, and to the BLM Hack Lake WSA along the western part of its southern boundary. Through the Hack Lake WSA it also connects to the Sweetwater Roadless Area on the WRNF.

The eastern boundary of the Red Dirt A Roadless Area appears to be entirely arbitrary in the WRNF and CRA inventories – it follows neither road nor watercourse nor other geographic feature of any kind. Up to that point, the southern boundary follows the Red Dirt Basin Road (FSR 4-611). The SRCA Red Dirt boundary continues to follow 611 east and then north to the Forest boundary, then along this boundary to Eagle County Road 39, northwest along 39 to the South Derby Road (FSR 4-613), then west along 613 to merge again with the WRNF/CRA boundary. (*Note: There is a forked cherry-stem along the SRCA eastern boundary for FSR 4-611.2A/2D that needs to be realigned to agree with a more recent WRNF road inventory.*)

The CRA boundary for this area needs to be readjusted to reflect the ground-based boundary drawn for the SRCA inventory. There is some evidence of logging and traces of old timber roads within this eastern extension, but nothing to deny its roadless character. There is also a significant stand (likely the largest stand on the White River) of Ponderosa Pine in the northeastern part of this extension.

The northern boundary for the WRNF and CRA inventories west of the Big Spring Road (FSR 4-618) has been drawn back from FSR 613 to follow the Lion Basin Ditch. There is no road along the ditch – the roadless area boundary should be redrawn to parallel 613 to a point where it merges naturally with the Flat Tops Wilderness Area boundary, as does the SRCA inventory boundary.

### **Red Dirt B (Derby) Roadless Area**

Eagle Ranger District, with part of the western edge in the Blanco RD

Location: West of Burns, off the Eagle County Colorado River Road (CR 301) via CR 39. Lies in both Eagle and Garfield Counties.

CRA Name: Red Dirt B

CRA Acres: 2500

2001 Name: Red Dirt B

2001 Acres: 2400

SRCA Name: Derby

SRCA Acres: 5000

The western end of the Red Dirt B Roadless Area bounds the Flat Tops Wilderness Area. As with the eastern boundary of Red Dirt A, the eastern boundary of Red Dirt B appears to be entirely arbitrary in the WRNF and CRA inventories – it follows neither road nor watercourse nor any other identifiable geographic feature.

As with Red Dirt A, the SRCA inventory boundary follows national forest roads, the forest boundary, and in this case the boundary of a private inholding. On the north it is bounded by the Middle Derby Road (FSR 4-612) and the North Derby Road (FSR 4-610). At the eastern end it abuts the national forest boundary, then follows the private access Road 4-655 west to the private land boundary, along the northern and western edges of that parcel down to the South Derby Road 613, which it follows to the Flat Tops Wilderness boundary. The CRA Red Dirt B boundary needs to be amended to follow the same logical and identifiable borders as the SRCA-inventoried area.

### **Red Mountain Roadless Area**

Aspen Ranger District

Location: Directly north of Aspen in Pitkin County

CRA Name: Red Mountain

CRA Acres: 6,500

2001 Name: Red Mountain

2001 Acres: 6,500

SRCA Name: Red Mountain

SRCA Acres: 6,800

The Red Mountain Roadless Area adjoins the Hunter-Fryingpan Wilderness at its eastern boundary. The WRNF and CRA inventories excluded land southwest of the Salvation Ditch on Red Mountain and left an irregular and unnecessarily large buffer around logging roads on Larkspur Mountain near the wilderness boundary.

### **Red Table Roadless Area**

Eagle and Sopris Ranger Districts

Location: Between Basalt and Eagle in Eagle County

CRA Name: Red Table

CRA Acres: 39,100

2001 Name: Red Table

2001 Acres: 39,100  
SRCA Name: Red Table  
SRCA Acres: 43,200

The Red Table Roadless Area, properly mapped to show current conditions and to reflect the recent WRNF Travel Management Plan's Record of Decision, is no longer a discrete roadless area, distinct from adjacent Basalt Mountain B and the Gypsum Creek Roadless Areas. The CRA inventory boundary for the Red Table Roadless Area excludes three parts of an area that the White River National Forest has recommended for wilderness designation and is managing as such—taking management actions, for example, like closure and decommissioning of roads that formerly separated these inventoried roadless areas (see comments in Basalt Mountain B). The Gypsum Creek Roadless Area is included in this recommendation and the Red Creek Road (FSR 4-425.1) and a portion of the Red Table Road (FSR 3-514.1) have been closed to all mechanized and motorized traffic, so that these two areas are now one continuous roadless area unseparated by roads.

The excluded areas that need to be added to the CRA inventory are around FSR 4-457.1 southwest of the L.E.D.E. Reservoir, north of the Leeman Gulch Road 4-417.1, and along the wilderness section of FSR 3-514.1. Additionally, the SRCA inventory identified over 1,000 acres of contiguous roadless land southeast of the WRNF and CRA inventoried area, the majority of which is being managed as deer and elk winter range. The CRA inventory needs to be updated and extended to include all of the areas being managed as Wilderness and the additional SRCA acres in order to fully and accurately reflect the actual extent of this roadless area.

**Reno Mountain Roadless Area**  
Rifle Ranger District  
Location: South of Rifle in Mesa County  
CRA Name: Reno Mountain  
CRA Acres: 12,400  
2001 Name: Reno Mountain  
2001 Acres: 12,400  
SRCA Name: Reno Mountain  
SRCA Acres: 12,800

The Reno Mountain Roadless Area adjoins the SRCA Hightower Roadless Area on the Grand Mesa National Forest. The WRNF and CRA inventories excluded several hundred acres along the West Divide Creek Road (FSR 800.1) and in Cayton Gulch on the northern side of the roadless area for no apparent reason. The SRCA inventory program supports and employs this practical, iterative approach to mapping roadless area boundaries. The CRA inventory should also connect these Roadless Areas.

**Ripple Creek Pass Roadless Area**

### **Blanco Ranger District**

Location: Between the northern edge of the Flat Tops Wilderness Area and Rio Blanco County Road 8 at the Ripple Creek Pass between the White River and Routt National Forests

CRA Name: Ripple Creek Pass

CRA Acres: 600

2001 Name: Ripple Creek Pass

2001 Acres: 600

SRCA Name: Ripple Creek Pass

SRCA Acres: 1500

The Ripple Creek Pass Roadless Area is adjacent to the northern boundary of the Flat Tops Wilderness at the boundary between the White River and Routt National Forests. Across the Routt National Forest boundary, it is adjacent to the much larger Bunker Basin Roadless Area (SRCA 16,100 acres, CRA 12,800 acres).

The WRNF excluded the greater part of the area between the Flat Tops Wilderness and the Ripple Creek Pass (CR 8) and Trappers Lake (FSR 2-205) Roads from its roadless inventory because of its proximity to these County and Forest Service roads. This is not a valid criterion for establishing a roadless area boundary and needs to be amended. The SRCA boundary that uses these two main roads and the Picket Pin –Lily Pond Trail 1812 at its very southeastern end is the model that the CRA should be following in this case.

### **Ryan Gulch Roadless Area**

#### **Dillon Ranger District**

Location: On the western edge of Silverthorne in Summit County

CRA Name: Ryan Gulch

CRA Acres: 600

2001 Name: Ryan Gulch

2001 Acres: 600

SRCA Name: Ryan Gulch

SRCA Acres: 1,700

The Ryan Gulch Roadless Area is bordered on its western side by the Eagles Nest Wilderness Area. The southern boundaries of the WRNF and CRA inventories are arbitrarily truncated at Salt Lick Gulch, when in fact the national forest roadless lands bordering the Eagles Nest Wilderness Area extend all the way to the Frisco exit off I-70. The full extent of this roadless area is documented in the SRCA inventory. The CRA inventory for this area needs to be corrected to reflect this actual extent.

### **Salt Creek Roadless Area**

#### **Eagle Ranger District**

Location: Southwest of Edwards in Eagle County

CRA Name: Salt Creek

CRA Acres: 5,600  
2001 Name: Salt Creek  
2001 Acres: 5,600  
SRCA Name: Salt Creek  
SRCA Acres: 10,600

The Porphyry Road 4-435.1 is, in fact, closed some distance south of the national forest boundary and so overgrown as to be impassable. This adds some 4,000 acres of contiguous roadless land and critical wildlife habitat from Porphyry Mountain west to Brush Creek to the CRA-inventoried area, including most of the CNHP East Brush Creek PCA (High Biodiversity Significance). The CRA inventory for this area needs to be extended to include this entire contiguous area in order to fully and accurately reflect the extent of this roadless area.

### **Sloan Peak Roadless Area**

Aspen and Sopris Ranger Districts  
Location: Northwest of Aspen in Pitkin County  
CRA Name: Sloan Peak  
CRA Acres: 20,000  
2001 Name: Sloan Peak  
2001 Acres: 20,100  
SRCA Name: Sloan Peak  
SRCA Acres: 31,400

The SRCA-inventoried Sloan Peak Roadless Area is adjacent to the Hunter-Frying Pan Wilderness Area at its eastern end.

There are two major deficiencies in the WRNF and CRA inventories of the Sloan Peak Roadless Area. The first is that about 3,000 acres of wild land directly adjacent to the Hunter-Fryingpan Wilderness Area are neither incorporated into the Sloan Peak Roadless Area nor inventoried as a roadless area in their own right. The reason given for not including them in the Sloan Peak Roadless Area is that a string of three privately owned mining claims nearly severs the continuity of public land between the currently-inventoried Sloan Peak Roadless Area and the section adjacent to the Hunter-Fryingpan Wilderness Area. But the southern two of these claims have permanent conservation easements on them and will never be developed, thus the actual roadless character of the land will remain continuous.

The second major exclusion is equally unjustifiable. Some 4,000 acres in the Red Canyon area were excluded because of a network of (mostly non-system) motorcycle trails. While such motor recreation would not be permissible in a wilderness area, it is specifically allowed in a roadless area.

Both of these errors in the WRNF inventory need to be corrected in the CRA inventory in order to make a full and accurate accounting of the extent of roadless land in this area.

The Red Canyon section must be added to the Sloan Peak area, and the Porphyry Mountain area (the area east of the mining claims) must be added to either the Sloan Peak or Wildcat Mountain Roadless Areas, or added to the inventory as a separate area.

### **Sweetwater A & B Roadless Areas**

Eagle Ranger District

Location: Flat Tops Mountains north of Glenwood Canyon

CRA Name: Sweetwater A and Sweetwater B

CRA Acres: Sweetwater A 11,900, Sweetwater B 4300, 16,200 total

2001 Name: Sweetwater A and Sweetwater B

2001 Acres: Sweetwater A 11,900, Sweetwater B 4300, 16,200 total

SRCA Name: Sweetwater

SRCA Acres: 21,800

The Sweetwater A Roadless Area is adjacent to the Flat Tops Wilderness Area along its northern border.

Sweetwater A and B are typical of the White River National Forest's Flat Tops "Roadless" Areas – their boundaries were determined as much by topography as by constructed roads and delineated land ownership. The clear intent of the WRNF roadless inventory here was to select areas considered capable and available for management as wilderness under the Forest Service's own guidelines. Roadlessness is only the first of the factors that guided the WRNF in its selection of areas and boundaries.

The next was what it calls "defensible" boundaries – boundaries that physically discourage travel by snowmobiles and other off-road vehicles. On the Flat Tops, the "defensible" boundaries are the canyon rims – the broad grasslands and open forest that cover the greater part of the Flat Tops were abandoned to the off-road vehicle users. Since off-road travel by snowmobiles is not prohibited in roadless areas, the WRNF's criteria for boundary determination are totally unsuitable for the CRA inventory of the Flat Tops in particular. Sweetwater A alone leaves out 4300 acres of Flat Tops tableland between its official boundary and the nearest roads.

It is incumbent upon the CRA to look past the narrow limits of the WRNF inventory to include all of the identifiable roadless areas on the White River National Forest – and, most of all, on the Flat Tops – in its State of Colorado Roadless Inventory. There is little disagreement between the SRCA and CRA inventories over the northern, eastern and western boundaries of Sweetwater A – basically, two irrigation ditches near the Wilderness boundary that were cherry-stemmed out as if they were roads. The southern boundary is where the CRA inventory leaves the road – specifically the Coffee Pot Road (FSR 4-600.1) as the southwestern boundary and the Jack Spring Road (FSR 4-618.1) along the southern boundary. The SRCA inventory does leave a major cherry-stem in the area for the Picket Pin Road (FSR 4-641.1). The SRCA inventory uses 618 as the principal southern boundary for Sweetwater B as well.

### **Tenderfoot Mountain Roadless Area**

Dillon Ranger District

Location: Directly east of Dillon in Summit County

CRA Name: Tenderfoot Mountain

CRA Acres: 8,400

2001 Name: Tenderfoot Mountain

2001 Acres: 8,400

SRCA Name: Tenderfoot Mountain

SRCA Acres: 14,400

The WRNF and CRA inventories for this area cover only the most pristine portion of the Tenderfoot Roadless Area, which leaves out 6,000 roadless acres, most of which is more than  $\frac{1}{4}$  mile from the nearest road or other development. This under-inventory by the WRNF needs to be corrected in the CRA in order to reflect fully and accurately the actual extent of roadless land in this area. The SRCA inventory includes most of the Dillon Bay Fen (High Biodiversity Significance) and the Straight Creek (Moderate Biodiversity Significance) CNHP PCAs.

### **Tenmile Roadless Area**

Dillon Ranger District

Location: Southwest of Frisco, west of Breckenridge in Summit County

CRA Name: Tenmile

CRA Acres: 6,200

2001 Name: Tenmile

2001 Acres: 6,400

SRCA Name: Tenmile Range

SRCA Acres: 27,800

The WRNF and CRA inventories of the Tenmile Roadless Area cover less than  $\frac{1}{4}$  of the actual contiguous roadless land in the Tenmile Range. The Wilderness-oriented “defensible boundary” rationale appears to be fully deployed in this case: the entire inventoried area is on the steeper, wind and avalanche-scoured west side of the range where there is no possibility of ski area development or timber harvesting, and no private mining claims to create management headaches. These considerations have no application in a true roadless area inventory, such as the one conducted by SRCA. The CRA needs to abandon the restrictive approach to the Tenmile Roadless Area taken by the Forest Service and extend the inventory boundary to the actual roads and private land and permitted ski area boundaries used in the SRCA inventory.

### **Thompson Creek Roadless Area**

Sopris and Rifle Ranger Districts

Location: West of Carbondale in Garfield and Pitkin Counties

CRA Name: Thompson Creek

CRA Acres: 18,500  
2001 Name: Thompson Creek  
2001 Acres: 18,500  
SRCA Name: Thompson Creek  
SRCA Acres: 31,200

The Thompson Creek Roadless Area is adjacent to the Clear Fork Roadless Area on the Gunnison National Forest. In the SRCA inventory, it is also contiguous with the Assignment Ridge and East Willow Roadless Areas, as well as the SRCA-identified Hayes Creek Roadless Area, forming a network of roadless land covering over 100,000 acres in an area of regional wildlife value.

The WRNF and CRA inventories for the Thompson Creek Area fail to account for changes in land ownership and route designations that have occurred since the WRNF inventory was initiated over ten years ago. In that time, the government has acquired large tracts of land from the defunct coal mine in Coal Basin west of Redstone, effectively connecting areas of national forest land previously separated by private holdings. Additionally, as the mine was decommissioned, many miles of mine roads were closed and reclaimed, which also served to consolidate and connect the roadless areas. The more recently conducted SRCA inventory takes these changes into account and should guide the necessary corrections and additions to the CRA inventory.

### **Tigiwon Roadless Area**

Holy Cross Ranger District

Location: South of Minturn along US 24 in Eagle County

CRA Name: Tigiwon

CRA Acres: 2,000

2001 Name: Tigiwon

2001 Acres: 2,000

SRCA Name: Tigiwon

SRCA Acres: 3,800

The Tigiwon Roadless Area is adjacent to the Holy Cross Wilderness Area. The northern boundary of the WRNF and CRA inventories bears no relationship to roads or the Forest boundary, but consists of a series of cartographic lines between obscure landmarks. Peterson Creek Road (FSR 7-706), is virtually abandoned and closed to all but foot traffic, so it should be incorporated into the roadless area as well. This brings the Tigiwon Roadless Area boundary down to the Eagle River, excepting privately held mining claims near the river. The CRA inventory boundary needs to be extended to show the actual extent of roadless land in this area, as illustrated by the SRCA Tigiwon inventory.

### **Treasure Mountain Roadless Area**

Sopris Ranger District

Location: Southeast of Marble in Gunnison County

CRA Name: Treasure Mountain

CRA Acres: 1,500

2001 Name: Treasure Mountain

2001 Acres: 1,500

SRCA Name: Treasure Mountain

SRCA Acres: 3,800

The Treasure Mountain Roadless Area is adjacent to the Raggeds Wilderness Area. The WRNF and CRA inventory boundaries bear no relation to roads, private parcels, or even the topography in the Treasure Mountain area, but consist of straight lines between highpoints in the upper part of the basin. As a result, the point on the northern boundary closest to the Crystal River Road (FSR 3-314.1) is still  $\frac{1}{2}$  mile away and 2,000 feet above the road. From the easternmost point on the boundary it is  $\frac{3}{4}$  mile due east to the end of the North Pole Basin Road (FSR 3-314.3P).

The rationale for this severely truncated boundary was the potential for snowmobile and ORV trespass into the area – a questionable argument since most of the excluded area consists of 30-45 degree slopes scoured by avalanche paths. In spite of this harsh terrain, some of the lower slopes of Treasure Mountain are covered with inactive mining claims that the SRCA inventory used as its boundary wherever the national forest land doesn't reach all the way to the Crystal River Road. The CRA inventory needs to adopt this approach to fully and accurately account for the actual extent of roadless land on Treasure Mountain.

### **Wildcat Mountain Roadless Area**

Sopris Ranger District

Location: East of Basalt near the headwaters of the Fryingpan River in Pitkin County

CRA Name: Wildcat Mountain

CRA Acres: 3,500

2001 Name: Wildcat Mountain A

2001 Acres: 3,500

SRCA Name: Wildcat Mountain

SRCA Acres: 3,300

The Wildcat Mountain Roadless Area is adjacent to the Hunter-Fryingpan Roadless Area. The SRCA inventory includes fewer acres than the WRNF and CRA inventories because it included the land on Cyclone Mountain at the west end of the Wildcat Mountain Roadless Area in its inventory of the Sloan Peak Roadless Area.

### **Wildcat Mountain B Roadless Area**

Sopris Ranger District

Location: East of Basalt near the headwaters of the Fryingpan River in Pitkin County

CRA Name: Wildcat Mountain B

CRA Acres: 2,300  
2001 Name: Wildcat Mountain B  
2001 Acres: 2,300  
SRCA Name: Wildcat Mountain  
SRCA Acres: 2,400

The Wildcat Mountain B Roadless Area is adjacent to the Hunter-Fryingpan Wilderness Area. The SRCA inventory includes a small area northwest of Nast on the Fryingpan River that was once subjected to timber thinning. Because this area excluded in the WRNF and CRA inventories straddles the river and includes wetland areas, it is appropriate to manage it as a roadless area in the future, and it should be added to the CRA inventory.

### **Wildcat Mountain C Roadless Area**

Sopris Ranger District  
Location: East of Basalt near the headwaters of the Fryingpan River in Pitkin County  
CRA Name: Wildcat Mountain C  
CRA Acres: 4,700  
2001 Name: Wildcat Mountain C  
2001 Acres: 4,700  
SRCA Name: Wildcat Mountain  
SRCA Acres: 6,100

The Wildcat Mountain C Roadless Area is adjacent to the Hunter-Fryingpan Wilderness Area and to the Mount Massive Roadless Area on the Pike-San Isabel National Forest.

The WRNF and CRA inventories of this area excluded two large parcels of roadless land that should properly be included in Wildcat Mountain C. The WRNF inventory used two underground tunnels – the Charles H Boustead water diversion tunnel and the historic Hagerman railroad tunnel – to artificially truncate the roadless area at its south end. On the west side, a long strip between the Hunter-Fryingpan Wilderness boundary and FSR 3-505.1 needs to be added to the CRA inventory. The Colorado Natural Heritage Program includes almost all of this extension in its High Biodiversity Significance Fryingpan River PCA. On the eastern side, the Wildcat Mountain C Roadless Area is adjacent to the Mount Massive Roadless Area on the Pike-San Isabel National Forest, and both are adjacent to an area of land between the Ivanhoe Lake Road (Pitkin County 4I) and a powerline corridor. This piece should also be added to the CRA inventory.

### **Williams Fork Roadless Area**

Dillon Ranger District  
Location: North of Silverthorne and east of Route 9 between Ute Pass and the north end of the Green Mountain Reservoir.  
CRA Name: Williams Fork  
CRA Acres: 6600

2001 Name: Williams Fork  
2001 Acres: 6600  
SRCA Name: Williams Fork  
SRCA Acres: 8800

The Williams Fork Roadless Area on the White River National Forest mirrors but never actually joins with the Copper Mountain Roadless Area on the Arapaho-Roosevelt National Forest side of the Williams Fork Mountains.

The WRNF and CRA inventories match  $\frac{3}{4}$  of the SRCA inventory almost exactly. The big difference is 2000+ unroaded acres between FSR 5-2850W.1 in Cox Gulch and the White River/Arapahoe-Roosevelt forest boundary 2½ mile to the north. There are no apparent roads or other reasons to terminate the boundary at Cox Gulch. The CRA inventory needs to be amended to include all the roadless land on the west side of Williams Peak.

The WRNF inventory totally failed to account for a smaller roadless area (approximately 3500 acres) that does adjoin the Copper Mountain Roadless Area on the Arapahoe-Roosevelt National Forest. The eastern boundary of the Williams Fork Roadless Area is formed largely by a powerline and service road cutting across the range and down into the Blue River Valley. Between the powerline and the forest boundary lie Eagle Roost Mountain and most of the Pass Creek Watershed. This area was identified too late to field-check and include in the SRCA inventory. The CRA can amend this oversight by verifying the apparent roadless character of this area and adding it to the Copper Mountain Roadless Area.

### **Woods Lake Roadless Area**

Sopris and Eagle Ranger Districts  
Location: South of Eagle in Eagle and Pitkin Counties  
CRA Name: Woods Lake  
CRA Acres: 9,500  
2001 Name: Woods Lake  
2001 Acres: 9,500  
SRCA Name: Woods Lake  
SRCA Acres: 14,300

The Woods Lake Roadless Area is bordered by the Holy Cross Wilderness on its eastern side. The WRNF roadless inventory failed to include almost 5,000 acres of roadless land in the East Brush Creek watershed south and east of Fulford that is both adjacent to the Holy Cross Wilderness Area and contiguous with the land included in the inventory. The CRA inventory needs to be extended northward to include this section outlined in the SRCA inventory in order to fully and accurately represent all of the roadless land in this area.

### **C. Roadless Areas That Were Excluded Altogether From the Roadless Inventory.**

The WRNF roadless inventory failed to identify, among other areas, a number of smaller roadless areas on the White River that adjoin larger areas on other Forests, particularly along the Continental Divide between Hoosier Pass and Loveland Pass on the Dillon Ranger District. Recognizing and appropriately managing these areas is vital to protect wildlife corridors along and across the Divide, as several of these areas have considerable biological significance.

#### **Bald Mountain Roadless Area**

Dillon Ranger District

Location: Southeast of Breckenridge in Summit County

SRCA Name: Bald Mountain

SRCA Acres: 4,800

The Bald Mountain Roadless Area is adjacent to the Boreas Roadless Area on the Pike-San Isabel National Forest, which in turn is connected to the SRCA Mount Guyot Roadless Area on the White River National Forest.

The Bald Mountain Roadless Area contains portions of both the Colorado Natural Heritage Program's Boreas Pass Potential Conservation Area (Very high Biodiversity Significance) and the Mosquito Range PCA (Outstanding Biodiversity Significance). It is incumbent on the CRA inventory to correct this kind of oversight and add the area of the SRCA Bald Mountain Roadless Area to its current Boreas Roadless Area. There is substantial habitat for marten in the area.

#### **Big Beaver Basin Roadless Area**

Blanco Ranger District

Location: East of Meeker in Rio Blanco County

SRCA Name: Big Beaver Basin

SRCA Acres: 8,700

RARE II Name: Big Beaver Basin

RARE II Acres: 8,300

Big Beaver Basin is an area of high habitat value for a broad range of species of value and concern to the White River National Forest and the State of Colorado, including: boreal toad, boreal owl, flammulated owl, goshawk, northern leopard frog, and American three-toed woodpecker. Located in the far northwest portion of the Flat Tops Plateau region, it is an important transition area between the montane and grassland ecosystems. This area should be added to the CRA inventory.

#### **Canyon Creek Roadless Area**

Rifle Ranger District

Location: Northwest of Glenwood Springs in Garfield County

SRCA Name: Canyon Creek

SRCA Acres: 36,000

RARE II Name: Canyon Creek

RARE II Acres: 38,000

“Canyon Creek A (24a)” and “Canyon Creek B (24b)” were among the areas that the White River National Forest originally evaluated for wilderness availability and capability during the preparatory stage for the White River National Forest Land and Resource Management Plan revision. Because the areas deemed to have defensible boundaries for Wilderness management were so small (4200 and 2400 acres, respectively), they were dropped from the roadless area inventory entirely. This decision had nothing to do with the actual size of the roadless area involved, as the SRCA inventory found Canyon Creek to be one of the four largest roadless areas on the entire White River National Forest. Rather, the Forest Service’s decision reflected only the agency’s perceived inability to manage it as a wilderness area.

It is imperative that the CRA inventory look past this decision and toward the character of the landscape itself. Between the Clinetop Road (FSR 603) on the western side of the area to the Transfer Trail (FSR 602) on the eastern side lie ten miles of wildlands carved by five major creeks: East Elk, Boiler, Canyon, East Canyon and Keyser. From the Forest boundary on the south to the Blair Mountain Road (FSR 601) on the north is a full six miles. Only one road of any length (Boiler Creek, FSR 636) is cherry-stemmed into the area. After the Red Table/Gypsum Creek roadless area it is the least road-impacted area on the White River National Forest outside of a designated Wilderness Area.

Canyon Creek is an area of overall good habitat value for species of concern to the White River National Forest and the State of Colorado, including lynx, marten, northern goshawk, northern leopard frog, northern three-toed woodpecker, olive-sided flycatcher and tiger salamander. It is critically important year-round for bighorn sheep. The SRCA Canyon Creek Roadless Area also contains almost the entire CNHP East Elk Creek PCA (High Biodiversity Significance). Omission of this major area from the CRA inventory calls into question the validity of the whole inventory process.

### **East Miller Creek Roadless Area**

Blanco Ranger District

Location: South of Meeker in Rio Blanco and Garfield Counties

SRCA Name: East Miller Creek

SRCA Acres: 6,200

East Miller Creek was not part of the original WRNF roadless area capability and availability evaluation, but is of comparable size and habitat value with the West Miller (10) and Middle Miller (11) areas that were evaluated. It has excellent overall habitat value, including an elk calving area, and is one of the least-disturbed areas for wildlife,

providing refuge and passage in the western portion of the Flat Tops. Its size, character and location warrant its inclusion in the CRA inventory.

### **Geneva Peak Roadless Area**

Dillon Ranger District

Location: East of Breckenridge in Summit County

SRCA Name: Geneva Peak

SRCA Acres: 1,600

The Geneva Peak Roadless Area is adjacent to the Burning Bear Roadless Area on the Pike-San Isabel National Forest.

The CNHP Sullivan Mountain Potential Conservation Area (High Biodiversity Significance) straddles the Continental Divide between the Geneva Peak and the Burning Bear Roadless Areas. The Montezuma PCA (High Biodiversity Significance) touches it on the west side and it is adjacent to the Collier Mountain PCA (High Biodiversity Significance) to the north and the Handcart Gulch PCA (Very High Biodiversity Significance) to the south.

It is incumbent on the CRA inventory to add the SRCA Geneva Peak Roadless Area to its current Burning Bear Roadless Area.

### **Hayes Creek Roadless Area**

Sopris Ranger District

Location: Southwest of Redstone in Pitkin County

SRCA Name: Hayes Creek

SRCA Acres: 7,800

RARE II Name: Drift Creek

RARE II Acres: 8,900

The Hayes Creek Roadless Area is adjacent to the SRCA-inventoried Clear Fork Roadless Area on the Gunnison National Forest and to the SRCA-inventoried Thompson Creek Roadless Area on the White River National Forest.

The Hayes Creek Roadless Area is an essential element in the 100,000+ acre Clear Fork Divide roadless area complex identified by state and national conservation groups for its exceptional habitat and landscape linkage value. Species found here include: boreal owl, boreal toad, marten, goshawk, American three-toed woodpecker, and tiger salamander.

The five adjacent national forest inventoried Roadless Areas that make up the larger Clear Fork Divide roadless complex are: Assignation Ridge, Hayes Creek, Thompson Creek and East Willow on the White River National Forest, plus the Clear Fork Roadless Area on the Gunnison National Forest. Additionally, the BLM Thompson Creek roadless area is adjacent to the Forest Service Assignation Ridge Roadless Area.

Hayes Creek alone has high habitat value for species of interest and concern to the White River National Forest and the State of Colorado, and together with the other five linked areas it is one of the biologically richest areas in and adjacent to the White River National Forest. The Hayes Creek Roadless Area is large enough to stand on its own without being linked to any other areas, and with the cessation of coal mining under its northern reaches, there is no reason to exclude it from the CRA inventory.

### **Hoosier East Roadless Area**

Dillon Ranger District

Location: South of Breckenridge in Summit County

SRCA Name: Hoosier East

SRCA Acres: 900

RARE II Name: Red Peak

RARE II Acres: Part of 5500-acre Red Peak area

The Hoosier East Roadless Area is adjacent to the 5100-acre SRCA-inventoried Hoosier Pass Roadless Area on the Pike-San Isabel National Forest, which in turn is adjacent to the White River National Forest's Hoosier Ridge Roadless Area. About half of the Hoosier East Roadless Area is included in the CNHP Mosquito Range (Outstanding Biodiversity Significance) and the Boreas Pass (Very High Biodiversity Significance) Potential Conservation Areas.

The purpose for identifying this seemingly small area is to ensure a complete inventory of all the roadless areas that cross national forest boundaries, something the WRNF did not do, especially along this portion of the Continental Divide.

### **Horse Park Roadless Area**

Rifle Ranger District

Location: South of Silt in Garfield County

SRCA Name: Horse Park

SRCA Acres: 7,100

RARE II Name: Horse Park

RARE II Acres: 9,700

The Horse Park Roadless area has high habitat value for a broad range of species of interest and concern to the White River National Forest and the State of Colorado, including: lynx, black swift, boreal owl, boreal toad, flammulated owl, golden crown kinglet, pygmy nuthatch, and Virginia warbler. It also contains a significant portion of the CNHP Willow Creek Potential Conservation Area (Moderate Biodiversity Significance). This RARE II area was dropped from the White River National Forest's inventory for unknown reasons. Nonetheless, the area is still of sufficient size and significance to warrant inclusion in the updated CRA inventory.

### **Independence Mountain Roadless Area**

Dillon Ranger District

Location: East of Breckenridge in Summit County

SRCA Name: Independence Mountain

SRCA Acres: 5,600

The SRCA Independence Mountain Roadless Area is connected to the SRCA Swan Mountain Roadless Area. Independence Mountain is a vital wildlife link through the southeastern part of Summit County, and preserving its roadless status is vital to this function. It also contains parts of the CNHP Montezuma (High Biodiversity Significance) and the North Fork Swan River (Very High Biodiversity Significance) Potential Conservation Areas. Its significance and its size warrant its inclusion in the CRA roadless area inventory, especially in the context of the relatively well-developed landscape nearby.

### **McArthur Mountain Roadless Area**

Aspen Ranger District

Location: South of Aspen in Pitkin County

SRCA Name: McArthur Mountain

SRCA Acres: 5,300

RARE II Name: Elk Mountain/Collegiate

RARE II Acres: 6,100

The McArthur Mountain Roadless Area is separated from the Collegiate Peaks Wilderness Area by a single jeep road (Pitkin County 15E), and carries the wild character and scenic value of that wilderness area right down into the Castle Creek valley. It stands well on its own as a roadless area and warrants inclusion in the CRA inventory.

### **Middle Miller Creek Roadless Area**

Blanco Ranger District

Location: Southeast of Meeker in Rio Blanco and Garfield Counties

SRCA Name: Middle Miller Creek

SRCA Acres: 5,200

Middle Miller Creek was evaluated by the White River National Forest for wilderness capability and availability as area #11. Subsequently it was reduced in size for being too flat and open and it fell below the standard 5,000 acre threshold. The roadless character of the area under review was never in question, only its manageability as wilderness. Of course, this standard has no bearing on the CRA inventory. The Middle Miller Roadless Area, as outlined in the SRCA inventory, needs to be added to the CRA inventory.

### **Milk Creek Roadless Area**

### **Blanco Ranger District**

Location: Northeast of Meeker in Rio Blanco County

SRCA Name: Milk Creek

SRCA Acres: 5,000

RARE II Name: Pagoda Peak

RARE II Acres: 48,700

The current roadless inventories no longer include an unbroken expanse of roadless land solely on the White River National Forest that stretches from Milk Creek to Pagoda Peak, but there is no system road between the Milk Creek and Morapos A roadless areas.

There are only the Three Points (FST 1807.2A) and the Konopic Cutoff (FST 1807.2B) trails. Given this situation, the SRCA inventoried Milk Creek Roadless Area needs to be merged into the Morapos A Roadless Area and included in the CRA inventory. The Milk Creek Area has good overall habitat values and includes Elk Winter Concentration and Severe Winter Range areas that are lacking in the currently inventoried Morapos A Roadless Area.

### **Mount Guyot Roadless Area**

Dillon Ranger District

Location: East of Breckenridge in Summit County

SRCA Name: Mount Guyot

SRCA Acres: 1,400

The Mount Guyot Roadless Area is adjacent to the Boreas Roadless Area on the Pike-San Isabel National Forest, which also connects to the Bald Mountain Roadless Area just west of the Mount Guyot Roadless Area on the White River National Forest.

The purpose for identifying such a small area is to ensure a complete inventory of the all the roadless areas that cross national forest boundaries, something the WRNF did not do along this portion of the Continental Divide. The Forest Service must correct this oversight and add the area of the SRCA Mount Guyot Roadless Area to its current Boreas Roadless Area.

### **Patterson Creek Roadless Area**

Eagle and Rifle Ranger Districts

Location: North of Glenwood Springs in Garfield County

SRCA Name: Patterson Creek

SRCA Acres: 700

RARE II Name: Hunns Peak

RARE II Acres: 13,200

The Patterson Creek Roadless Area is adjacent to the Flat Tops Wilderness. Due to later road construction, the Patterson Creek Area is no longer part of the Hunns Peak Roadless Area. However, it was included in the White River National Forest's forest planning

evaluation of areas capable and available for Wilderness designation as area 22b with 300 acres. The SRCA inventory GIS analysis found 400 more roadless acres contiguous with the area identified by the WRNF.

Since wilderness area boundaries are so often drawn with management considerations in mind, it is essential that a roadless area inventory look carefully at all possible qualifying lands to ensure that it includes all land with roadless qualities, regardless of whether there is any intent to add it to a wilderness area. Patterson Creek fits in this category and needs to be added to the CRA inventory.

### **Ruby Lakes Roadless Area**

Aspen Ranger District

Location: Southeast of Aspen in Pitkin County

SRCA Name: Ruby Lakes

SRCA Acres: 2,400

The Ruby Lakes Roadless Area is adjacent to the Collegiate Peaks Wilderness Area. It is a pocket of scenic alpine roadless land bordered on three sides by the Collegiate Peaks Wilderness Area that deserves to be added to the CRA inventory.

### **Star Peak Roadless Area**

Aspen Ranger District

Location: South of Aspen in Pitkin County

SRCA Name: Star Peak

SRCA Acres: 5,500

RARE II Name: Elk Mountain/Collegiate

RARE II Acres: 4,300

The Star Peak Roadless Area is adjacent to the CRA Double Top Roadless Area on the Gunnison National Forest (the Cement Mountain Roadless Area in the SRCA inventory).

Star Peak, with its long, jagged arêtes and deep cirques, is the iconic peak of the Castle Creek Valley. Were it not for the Pearl Pass and Taylor Pass on its western and eastern sides, the Star Peak Roadless Area would already be part of either the Maroon Bells-Snowmass or Collegiate Peaks Wilderness Areas.

The Star Peak Roadless Area is divided into two parts by the closed Cooper Basin Road (FSR 121.1) that leads to a closed iron mine on Taylor Peak and undeveloped mining claims on the north ridge of Taylor Peak. It is a functionally continuous alpine roadless area divided by ownership. The southern piece is adjacent to the Double Top Roadless area and certainly needs to be added to the CRA inventory, either on its own or as an addition to the Double Top Roadless Area. The northern section covers only about 3,000 acres but is classic alpine and sub-alpine terrain that includes the CNHP Taylor Pass Potential Conservation Area (Very High Biodiversity Significance). It should be

considered as a smaller, stand-alone roadless area or as a non-contiguous part of the larger Star Peak-Double Top Roadless Area.

### **Swan Mountain Roadless Area**

Dillon Ranger District

Location: East of Breckenridge in Summit County

SRCA Name: Swan Mountain

SRCA Acres: 6,100

The Swan Mountain Roadless Area is adjacent to the Independence Mountain Roadless Area. The Swan Mountain Roadless Area contains half of the Elk Severe Winter Range in the upper Blue River Valley and the best overall habitat for species of interest and concern to the White River National Forest and the State of Colorado of the SRCA-inventoried roadless areas in the Upper Blue. These species include black swift, boreal toad, golden crown kinglet, marten, northern three-toed woodpecker, olive-sided flycatcher, pallid bat and tiger salamander. These characteristics, combined with its relatively small size and isolation from large areas of roadless land and designated Wilderness make it all the more important to add it to the CRA inventory and to keep it roadless.

### **Three Forks Roadless Area**

Blanco and Rifle Ranger Districts

Location: North of Rifle in Garfield County

SRCA Name: Three Forks

SRCA Acres: 8,700

RARE II Name: Three Forks

RARE II Acres: 9,000

The Three Forks Roadless Area was analyzed in the White River National Forest's forest planning evaluation of areas capable and available for wilderness designation as area 18. As with so many roadless areas on the Flat Tops, the inventory boundary was restricted to the areas below canyon rims, so an 8700-acre area without roads became a 3000-acre area that was dropped from further consideration for recommendation as a wilderness area. The CRA inventory needs to look beyond this procedural process of elimination to the actual character of the land and add Three Forks to its roadless area inventory.

### **West Miller Creek Roadless Area**

Blanco Ranger District

Location: South of Meeker in Rio Blanco and Garfield Counties

SRCA Name: West Miller Creek

SRCA Acres: 6,700

The West Miller Creek Roadless Area was analyzed in the White River National Forest's forest planning evaluation of areas capable and available for wilderness designation as area 10. As with so many roadless areas on the Flat Tops, the inventory boundary was reduced for its flatness, openness to snowmobiles, and even for grazing uses, so a 6700-acre area without roads became a 2600-acre area that was dropped from further consideration for recommendation as a wilderness area. The CRA inventory needs to look beyond this procedural process of elimination to the actual character of the land and add West Miller to its roadless area inventory.

### **Whale Peak Roadless Area**

Dillon Ranger District

Location: South Eagle in Eagle County

SRCA Name: Whale Peak

SRCA Acres: 1,400

The Whale Peak Roadless Area is adjacent to the Jefferson Roadless Area on the Pike-San Isabel National Forest.

The purpose for identifying smaller areas is again to ensure a complete inventory of the all the roadless areas that cross national forest boundaries, something the WRNF did not do along this portion of the Continental Divide. Thus the SRCA Whale Peak Roadless Area should be added to the current Jefferson Roadless Area.

Please let us know how we can help you improve the Colorado roadless area inventory.

Sincerely,



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