

OUTDOOR ALLIANCE

January 25, 2019

Governor Gary Herbert
350 North State St., Ste. 200
PO Box 142220
Salt Lake City, UT 84114-2220

Re: Outdoor recreation and Utah's petition for a state-specific Roadless Rule

Dear Governor Herbert:

As representatives of the outdoor recreation community, we write to share our thoughts regarding the state's intention to petition the U.S. Forest Service to develop a state-specific Roadless Rule for the state of Utah. Roadless Areas in Utah contain some of the state's most valued outdoor recreation opportunities, and the management regime under the existing Roadless Rule works exceptionally well for protecting outdoor recreation. In short, we believe strongly in the efficacy and appropriateness of the existing Roadless Rule and believe no changes are necessary. If, however, the state is determined to proceed with a petition, we ask that you proceed slowly and cautiously, with robust opportunities for public engagement before the petition is submitted, and work to ensure that any changes result in a net increase in the conservation and recreation value of the rule.

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

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

Importance of Utah Roadless Areas

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



OUTDOOR ALLIANCE

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

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

Public process

Because of the importance of the Roadless Rule in Utah, for outdoor recreation, as well as for conservation values, including clean air, clean water, and wildlife habitat, public process surrounding potential changes is of critical importance. While we appreciate the steps the state has taken to reach out to affected jurisdictions—and we strongly support the cautions raised in letters from the governments of Salt Lake City and Salt Lake County—more opportunities for public engagement are necessary. In particular, the state should conduct more robust outreach to the outdoor recreation community to better understand the potential negative effects of protection roll backs on recreation opportunities and the outdoor recreation economy, and we would welcome the opportunity to meet with you to discuss our community's concerns.

Additionally, to better understand the objectives of the state and facilitate necessary stakeholder collaboration, the state should more clearly articulate the objectives animating the desire for alterations to the existing rule. The existing 2001 Roadless Rule contains exemptions to facilitate fire suppression and forest health,² and the state must more clearly articulate objectives if there is to be a broadly supported public process for any state-specific adjustments that might be necessary. At minimum, the state should allow for public comment on any proposed petition to the U.S. Forest Service before that petition is submitted.

Potential new rule

The outdoor recreation community in Utah is incredibly well-served by the current Forest Service Roadless Rule, and our preference is that no changes are made. Moving forward, we

¹ See attached overview map.

² See, e.g., 36 CFR §294.12(b)(1) (allowing road construction to address imminent fire threat), 36 CFR §294.13(b)(2) (allowing timber harvest to improve forest health).



OUTDOOR ALLIANCE

believe it essential that, if the state is determined to pursue changes, those modifications will ensure conservation and recreation values are maintained or enhanced, not degraded for the sake of potential short-term benefits. Following on the example of the Colorado Roadless Rule—which in some respects improved upon the national rule from a conservation and recreation standpoint—this may be possible.

The “Proposed Management Area Categories” document published on the state’s website,³ however, does not appear to meet these criteria. Under the proposed categories, the state appears to propose a regime where the strongest proposed protections (“primitive areas”) are managed to existing standards, while the remaining three categories represent a spectrum of partial to total rollbacks of existing protections. This is unacceptable.

Moving forward, we strongly request that the state slow down its process to engage in serious and robust dialogue with affected stakeholders prior to petitioning the U.S. Forest Service. The state should—based on a transparent and careful process and careful articulation of legitimate needs—then consider whether such a petition is in fact necessary. Any petition that follows should request a rule that at minimum results in no net loss to recreation and conservation values. We welcome the opportunity to assist in such a process and share information that may be useful in your consideration of the myriad values provided to Utahns by the Forest Service Roadless Rule.

Best regards,

Tom Diegel, Board Member
Wasatch Backcountry Alliance
Salt Lake City, Utah

Jason Keith, Board Member
Friends of Indian Creek
Moab, Utah

Julia Geisler, Executive Director
Salt Lake Climbers Alliance
Salt Lake City, Utah

Charlie Sturgis, Executive Director
Mountain Trails Foundation
Park City, Utah

Louis Geltman, Policy Director
Outdoor Alliance
Washington D.C.

cc: Tom Adams, Director, Office of Outdoor Recreation at Utah Governor's Office of Economic Development

³ <https://ourforests.utah.gov/wp-content/uploads/2018/11/Roadless-Rule-Management-Categories-Updated-Draft-11-28-2018.pdf>



OUTDOOR ALLIANCE

Utah's Roadless Areas and Human-Powered Recreation Resources

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

