

QUIETLY PAVING PARADISE

HOW BUSH POLICIES STILL THREATEN AMERICA'S NATIONAL FORESTS



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About The Photographs:

Over the past four years Dr. Nelson Guda has traveled tens of thousands of miles, hiking and kayaking into some of the least known National Forest lands in the US to photograph our country's Inventoried Roadless Areas. The photographs in this report are from his upcoming book his search for these places. In February, 2009, photographs from Dr. Guda's roadless project were exhibited in the rotunda of the Russell Senate Building in Washington, DC. As part of his effort to bring more public awareness to the issue of roadless area conservation, Dr. Guda also created Roadlessland.org, a website that maps and displays photographs and information about all of the lands covered by the Roadless Rule.

For more information about Dr. Nelson Guda's book see: www.nelsonguda.com/roadless

For maps and detailed information about individual roadless areas see: www.roadlessland.org

Cover: Tongass National Forest, Alaska This Page: Pioneer Mountains, Idaho



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Executive Summary

America's roadless national forests are treasured pieces of our common landscape and heritage. Pristine forests have provided generation after generation of Americans with clean air and water, and opportunities to experience the beauty of the great outdoors. Furthermore, these forests represent some of the last suitable habitat for many species of wildlife. In 2001, the Roadless Area Conservation Rule offered protections for 58.5 million acres of our intact national forests against the threat of road building associated with logging, mining, and drilling.

Unfortunately, the past eight years of forest policy rollbacks and legal battles have left these forests frighteningly vulnerable. Upon taking office, the Bush administration immediately halted implementation of the Roadless Rule, and attempted to replace it with a state petition process that undermined strong protections. As it now stands, forests from the Rockies to the Appalachians have questionable protections under the Roadless Rule. Due to pending court appeals and eight years of attempts to rollback forest policy, the future of the rule—and the pristine forests it aims to protect—is dangerously uncertain.

In fact, our research found that national forests in Oregon, Alaska, Colorado, and Idaho are just some of the treasured landscapes facing more pressing threats than they have since the inception of the Roadless Rule. We looked at government documents detailing proposed logging, mining and road building projects and found that the bulldozers and chainsaws could start roaring into these forests as soon as this spring.

At stake in Oregon are roadless areas in the Umpqua National Forest. A proposed timber sale threatens to destroy roadless forests including part of the Oregon Cascades Recreation Area. This project would bulldoze 1,515 acres and undermine the Roadless Rule that still stands in Western states.

Alaska's Tongass National Forest is endangered by several pending projects that will devastate the lush, forested islands for which it is known. Projects such as the Logjam Timber Sale, Central Kupreanof Timber Harvest, Tonka Timber Sale, Kuiu Timber Sale and Iyouktug Timber Sale threaten to permanently mar tens of thousands of acres.

Under a state specific Roadless Rule created during the Bush administration, Idaho's forests have weaker protections than other forests across the country. A full 405,900 acres have been placed into a management category that allows road construction and emphasizes access for phosphate mining. J.R. Simplot, a company that mines phosphate all across Idaho, is pushing leases forward. Additionally, five million acres of roadless forests across the state have weakened protections to accommodate logging.

On the heels of the Idaho rule, the state of Colorado is on its way to finalizing its own state specific Roadless Rule. This rulemaking has reduced protections in roadless forests that are of interest to coal and oil and gas companies. Currently included in the proposed rule are exemptions for future coal mining at Priest Mountain and oil and gas leases in the Clear Fork Divide Roadless Area.



Despite the number of acres of national forests that are threatened by pending projects, there is still hope. President Obama has made clear his support for strong protections of our roadless national forests. The time has come for immediate action to ensure these forests are around for future generations.

Department of Agriculture Secretary Vilsack has the power to issue a "time out" for our forests. Secretary Vilsack should require secretarial-level approval of any U.S. Forest Service project that might be inconsistent with the rule to protect these wild forests while steps are taken to fully implement the Roadless Area Conservation Rule.

Time is running out for these wild lands. The administration has to act quickly to preserve our roadless forests for future generations. After all, once they're gone, they're gone forever.



Background

From the dramatic coastlines of Alaska's temperate rainforest to the lush, deciduous, eastern forests of the Appalachians, America's national forests are invaluable pieces of our natural heritage. Already more than half of our national forests are crisscrossed with roads and development. The remaining 58.5 million acres of untouched, roadless national forests have varying degrees of protection.

This was not always the case. In January of 2001, President Clinton signed a rule to protect all 58.5 million acres of our last roadless forests from road construction associated with logging, mining, and drilling. The Roadless Area Conservation Rule was the result of the most popular and extensive rulemaking process in history, receiving more than 1.6 million public comments—over 95 percent of which supported strong protections for these forests.1

In addition to providing drinking water for 60 million Americans² and offering unmatched opportunities for outdoor recreation, America's national forests are invaluable sanctuaries for wildlife. Roads and development greatly reduce the quality of this habitat. Roads lead to increased erosion, air and water pollution, spread of invasive exotics, wildlife mortality, and habitat fragmentation.³ All of these factors degrade the already sparse suitable habitat for wildlife and fragment them into smaller and more isolated islands in a sea of development.

Despite the recreational and ecological significance of our roadless forests, the Bush administration halted implementation of the Roadless Rule upon taking office, refused to defend it against legal challenges, and attempted to replace it with a state petition process. The administration also "temporarily" exempted 8.5 million acres of national forest lands in Alaska from Roadless Rule protections. The status of the rule is uncertain due to legal conflicts between courts in California and Wyoming. Appeals are pending in both circuits.

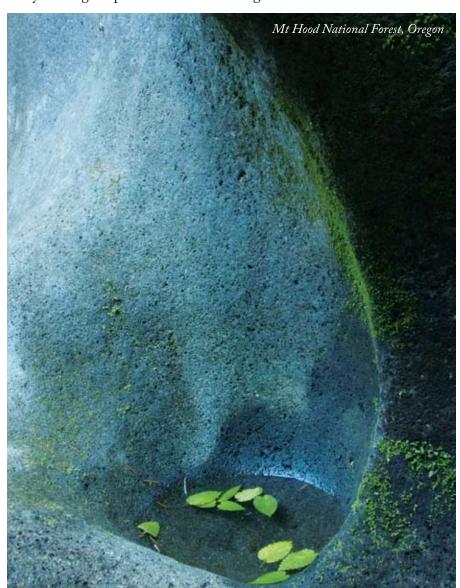
Our research uncovered that under the nose of a new, environmental administration, there are several projects pending that could devastate some of America's most treasured roadless forests in Oregon, Alaska, Idaho and Colorado. If immediate action is not taken, these pristine forests could be lost forever. The following pages highlight some of the most egregious threats to the roadless forests that the Roadless Rule was meant to protect.

Oregon's Forests

Oregon's national forests boast some of the most spectacular scenery in the country. From the towering peaks of Mount Hood to the rivers and streams of the Umpqua National Forest, it is no wonder that people travel from across the country and the world— to experience Oregon's great outdoors.

Beyond their scenic value, Oregon's national forests have tremendous ecological significance. Lush stands of cedar, hemlock, and Douglas-fir cloak the mountain tops, transitioning to mixed conifers and hardwoods in the lower elevation forests. Hundreds of species of wildlife, including 58 that are listed as endangered or threatened, make their home in Oregon's forests.4

Oregon contains more than 15 million acres of national forest land, but currently only 1.97 million of these acres are roadless areas. With a thriving outdoor community from hikers and campers to hunters and anglers, it may come as a surprise that many of Oregon's pristine forests are facing serious threats.



FORESTS AT RISK

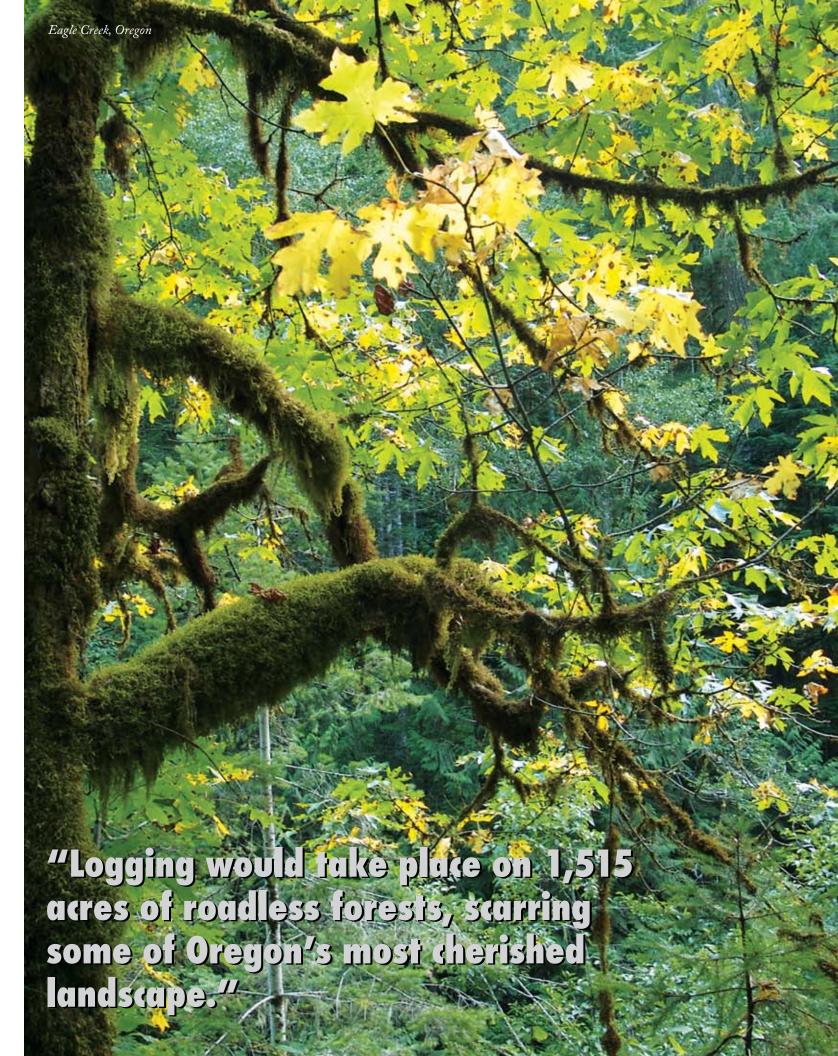
Named for its thundering waters, the Umpqua National Forest provides an outstanding backdrop for recreational opportunities. The waterways and diverse landscapes of the forest create a unique habitat that supports more than 250 species of wildlife.⁵

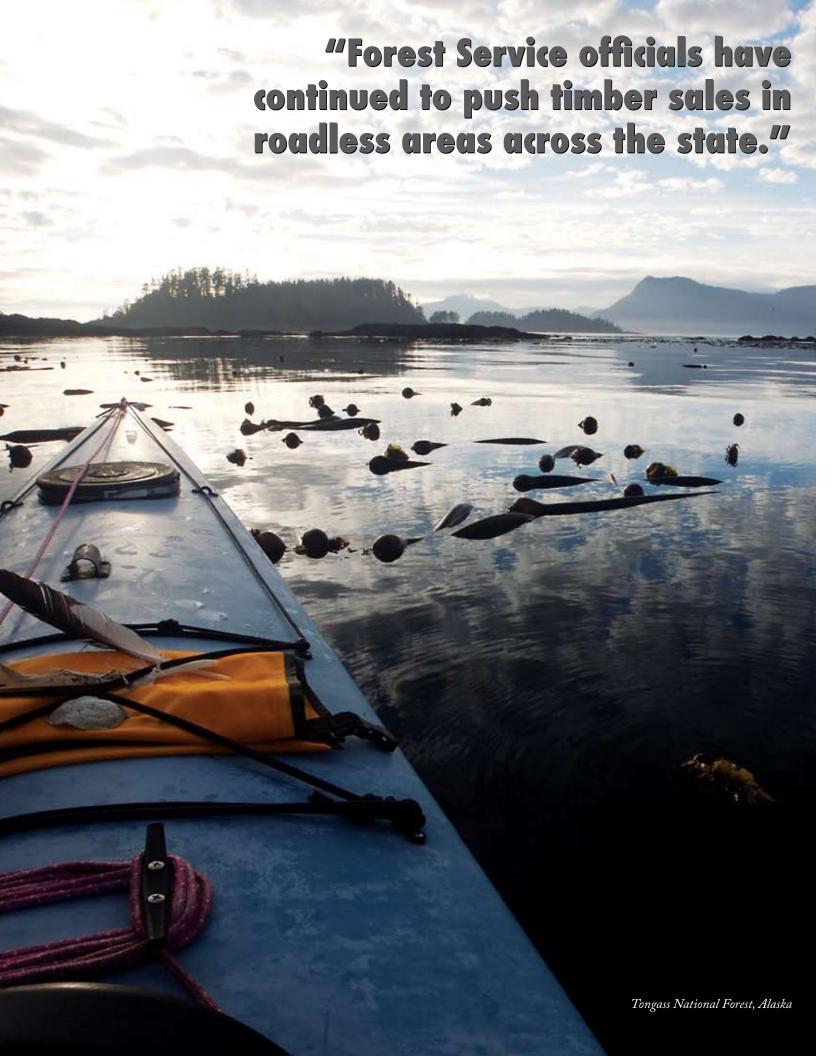
Right in the heart of the Umpqua, the innocuous-sounding D-Bug Hazard Reduction Timber Sale Project threatens to encroach upon this beautiful landscape. The D-Bug timber sale will allow commercial logging on some of Oregon's last intact forests. The specific forests at risk include Mt. Bailey and Thirsty Creek Appendage Inventoried Roadless Areas and the roadless Oregon Cascades Recreation Area. Logging would take place on 1,515 acres of roadless forests, scarring some of Oregon's most cherished landscape.⁶

The Forest Service is using the threat of mountain pine beetles in the Diamond Lake Ranger District as grounds for logging and thinning in roadless forests, even though there is disagreement as to the effectiveness of this approach. Mountain

> pine beetles predominantly affect lodgepole pine stands, but can be found in other pine species as well. While the Forest Service justifies logging in these forests to contain the beetles, a recent scientific study that modeled beetle outbreak shows the opposite. The authors found a higher rate of tree mortality from beetle infestation in thinned forests versus forests that were left untouched. The findings even suggested an increased rate of wild fire in these thinned forests.⁷ Furthermore, roads and other disturbances exacerbate the spread of pathogens such as invasive species. Logging and road building projects stress ecosystems by removing vegetation and allowing easier movement through the ecosystem by invasive species. These factors can increase chances of outbreak.8 Clearly, there is no strong scientific case that logging in roadless forests will address a beetle epidemic. Instead, untouched forests have proven to be resilient when left to their natural processes.

In addition to being based on questionable science, the D-Bug project could set a precedent for road building in pristine forests in Oregon and across the country. For eight years, despite legal and administrative challenges, the Roadless Rule has remained the law for protecting Oregon's almost 2 million acres of roadless national forests. If this project goes forward, it will be in violation of the Roadless Rule. Left unchallenged, the D-Bug project has the potential to increase the chances of future development in all of America's roadless forests.





Alaska's Forests

Towering old growth stands, the northern lights, wild, forested islands—the Tongass is the largest temperate rainforest in the world and the nation's largest national forest. Covering most of Southeast Alaska, the Tongass provides unmatched opportunities to experience the breath-taking landscapes of wild America.

The lush vegetation of the Tongass National Forest, including bountiful forests of Sitka spruce, western hemlock, shore pine and yellow cedar, provide invaluable habitat for hundreds of species of wildlife. Southeast Alaska is home to more than 300 species of birds such as the forest-dwelling goshawk and marbled murrelet. The cool, clear, streams and waterways in the Tongass National Forest provide exceptional, pristine habitat for spawning salmon and trout. These water resources support Alaska's popular—and economically valuable—sport and commercial fishing industries.

In 2001, the Roadless Rule included this majestic temperate rainforest's 8.5 million acres of roadless areas under its protections.¹⁰ However, in 2005 the Bush administration "temporarily exempted" the Tongass from the rule, leaving its roadless forests vulnerable to destruction. This possibility came closer to reality when the U.S. Forest Service released the 2008 Forest Management Plan for the Tongass, allowing logging on thousands of acres of roadless forest. Since then, Forest Service officials have continued to push timber sales in roadless areas across the state. Highlighted below are just a few of the proposed projects scheduled to start as soon as this spring.

FORESTS AT RISK

Alaska's Tongass National Forest spans the length of the Alexander Archipelago. These islands are covered with towering forested mountains that are mirrored from below by deep valleys, streams, and saltwater bays carved by receding glaciers. Sitka black tailed deer, bear and wolves roam these islands, and it is not uncommon to see bald eagles soaring above the treetops. The bountiful waterways are brimming with several species of salmon, halibut and red snapper.¹¹

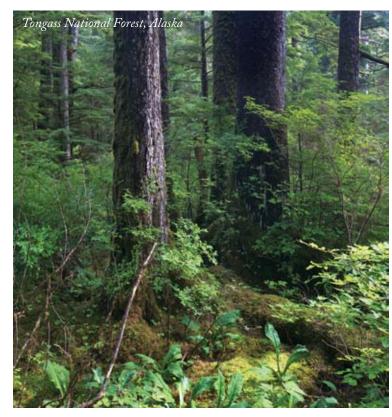
The pristine islands of the Tongass have two logging projects that are approved to go forward. One of these projects is the Kuiu Timber Sale on North Kuiu Island. The final decision states that 397 acres will be affected by this project, including logging and road building on 114 acres in the North Kuiu and Security Creek Roadless Areas.¹² Further north, another urgently threatened forest lies in the northeastern section of Chichagof Island. The final Iyouktug Timber Sale documents were published in April of 2008. There are 22,249 acres of roadless forest included in the project area, and 1,871 of these acres would be logged.¹³ Currently these lands are up for sale to the highest bidder.

Other sales are in the planning stages. On Prince of Wales Island, the Logiam Timber Sale is progressing quickly through the decision process. This project would allow logging on 99 acres of roadless forests in Prince of Wales Island, leaving this wild forest with logging roads and tree stumps in place of pristine habitat. 14 The draft plan for the project was released in December of 2008, and this forest could be opened to logging in the coming year.

Prince of Wales' neighbor to the North is Kupreanof Island. The draft plan for the Central Kupreanof Timber Sale proposes logging 70.2 million board feet, which means hundreds of thousands of trees, in the heart of this island. Included in the affected area are 1,220 acres of roadless forests, 434 acres of which will be logged. 15 This would leave the lush forests of this island marred by timber roads and clear-cuts.

Also under threat on Kupreanof Island is the Lindenberg Peninsula, where the planning process for the Tonka Timber Sale began in January of 2009. The proposed project area would include 30,689 acres of roadless areas, meaning that about half of the project would take place within roadless forests. ¹⁶ The entire 22,445 acres of the Lindenberg Roadless Area and a vast 8,244 acre section of the Green Rocks Roadless Area would be logged. The Forest Service estimates a need for 11 miles of new roads, some of which would be in roadless areas. Logging could begin as early as next year and would devastate an entire section of the island.

When looking at the projects outlined here, more than 54,000 acres of roadless forest will be affected. This acreage includes the Kuiu, Iyouktug, Logjam, Kupreanof, and Tonka timber sales.



Idaho's Forests

Snow-capped mountains, wildflower-filled grasslands, babbling brooks, verdant stands of conifers—Idaho is so much more than a state of potatoes and agriculture. The "Gem State" contains 20.5 million acres of national forest land, 9.3 million of which are designated roadless.

The Caribou-Targhee National Forest, which dominates the northern part of the state, is a part of the Greater Yellowstone Ecosystem. At a massive 12 million acres, this ecosystem is the largest remaining block of pristine plant and animal habitat in the contiguous United States. The forest has gained international recognition for its ecological significance, and the United Nations has designated the area a Biosphere Reserve. Residing in the heart of this untouched wilderness are diverse wildlife species such as grizzly bear, lynx, cutthroat trout, wolverines, elk, and mule deer.

FORESTS AT RISK

In response to the Bush administration's attempt to implement a state by state petition process, Idaho's then-Governor, Jim Risch, submitted a petition for the management of Idaho's roadless national forests. The state by state petition process was thrown out by a court ruling in 2006, but the Bush administration chose to keep reviewing petitions through an existing policy, the Administrative Procedure Act (APA). The result has been the implementation of a state-specific Roadless Rule for Idaho.

Thanks to the hard work of environmental, tribal, hunting and angling, and community groups in Idaho, the final rule has much stronger protections for roadless forests than the initial proposal. However, there are still large parcels of pristine forests

that are carved out to benefit special interests. The Idaho Roadless Rule employs five management themes that regulate the management of roadless forests in Idaho. About 405,900 acres would be designated as General Forest, Rangeland, and Grassland under the Idaho Roadless Rule. This management theme allows road construction for phosphate mining and logging in roadless areas.17

In particular, J.R. Simplot, a large agribusiness based in Boise, Idaho, stands to substantially benefit if these areas are no longer protected. One of their main products is chemical fertilizer, of which phosphate is a major component. J.R. Simplot

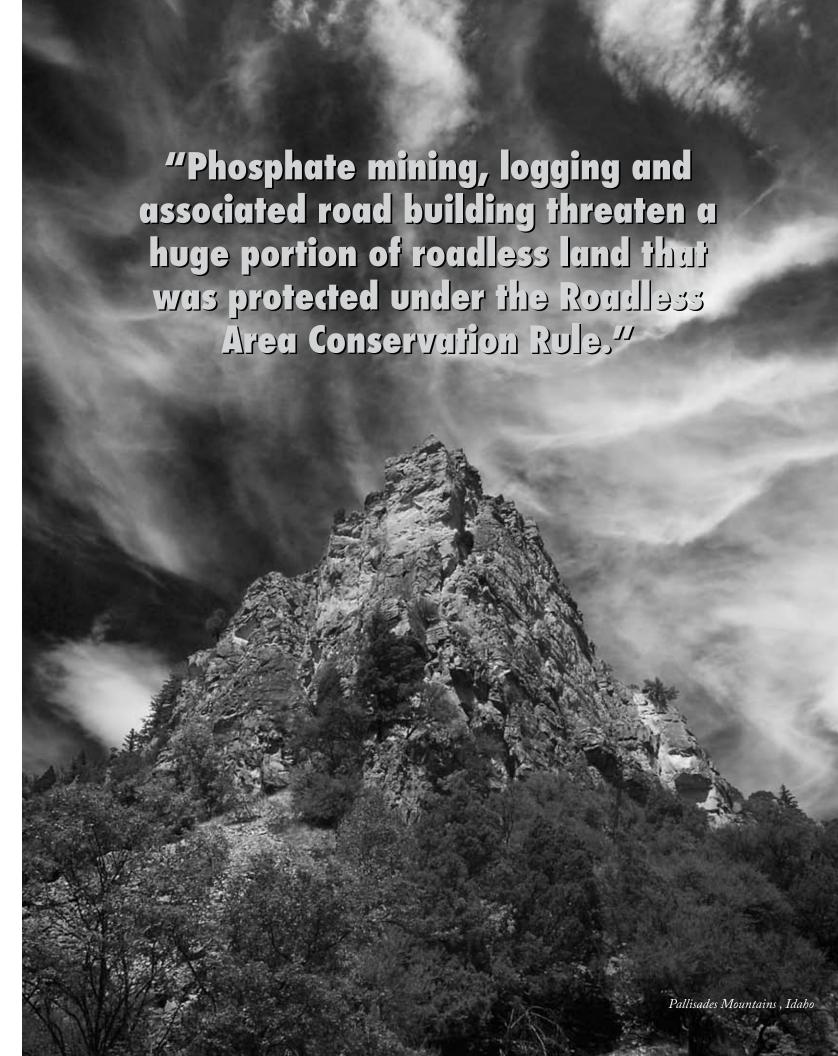
has been actively mining this phosphate from Idaho's roadless forests for years because its current mining operations were allowed under a grandfather clause in the Roadless Rule. However, the Simplot Company submitted a proposal to extend its open pit phosphate mining operations in the Smoky Canyon Mine further into roadless areas. This would allow clear-cutting and open pit mining in the Sage Creek and Meade Peak Roadless Areas.

The Idaho Roadless Rule clears the way for this mine development. Under the Idaho rule, the two areas in question— Sage Creek and Meade Peak— are placed under the General Forest, Rangeland, and Grassland management theme, thereby allowing logging, mining and drilling. However, these two roadless areas are not the only forests that are vulnerable. In fact, a huge swath of southeastern Idaho will be opened to highly toxic phosphate mining. Also included in the General Forest, Rangeland, and Grassland management theme are Dry Ridge, Stump Creek, and Huckleberry Basin Roadless Areas in southeastern Idaho. 18 There are an estimated 260 million tons of phosphate deposits that will be mined from 5,770 unleased acres across the state, impacting a total of 6,580 roadless acres. 19

Beyond opening nearly half a million acres to immediate development, the Idaho Roadless Rule, to accommodate temporary roads for logging, weakens protections for more than 5 million additional acres designated as Backcountry. Under this plan, Idaho's roadless forests would see 15,000 acres logged over the next 15 years. Furthermore, roads could be built on 253,500 acres of roadless areas with "highly sensitive soils" and will be conditionally allowed on an additional 1,786,400 acres of roadless forests.²⁰ Phosphate mining, logging and associated road building threaten a huge portion of roadless land that was protected under the Roadless Area Conservation Rule. Under Idaho's state specific rule, these projects could go forward at any point.



A J.R. Simplot phosphate mine in the Caribou-Targhee National Forest



Colorado's Forests

Hillsides of aspen and ponderosa pine stretching below jagged mountain peaks covered with spruce—Colorado's mountains could be described as an arboreal mosaic. Colorado's national forests are arguably some of the most popular outdoor recreation destinations in the country attracting millions of visitors each year and driving Colorado's \$10 billion a year outdoor recreation industry.²¹ The towering Rocky Mountains and their rolling foothills support hundreds of wildlife species including mountain lions, elk and big horn sheep. Also found in Colorado's forests are 31 species of threatened or endangered wildlife.²²

FORESTS AT RISK

Following on the heels of the Idaho Roadless Rule, the U.S. Forest Service is creating a state specific Roadless Rule for Colorado. The draft rule fails to measure up to the Roadless Area Conservation Rule level protections, allowing for more logging, drilling and mining in some of Colorado's last intact forests.

The potential negative impacts of the Colorado Rule on forest ecosystems could include "long term temporary roads" which could be in place for 30 years before being decommissioned. The effects of soil compaction and the spread of invasive species would begin immediately. According to Forest Service planning documents, the proposed rule would significantly increase the spread of invasive plants at a rate of 38 acres per year versus the current 4 acres per year. Logging in roadless areas would increase by 102,000 acres over the next fifteen years. Projections for oil and gas development would increase by 422 wells, providing "much more opportunity for oil and natural gas development and productions than the 2001 rule" according to the Forest Service.²³ The draft rule would greatly reduce the wild and natural character of Colorado's forests and leave them with significantly weaker protections than the national Roadless Rule. Below are two examples of areas at risk.

One of the most glaring problems with the Colorado Roadless Rule can be found in five roadless areas surrounding Priest Mountain. Located east of Grand Junction, much of the Priest Mountain area offers opportunities for camping, hiking, and challenging terrain for outdoor enthusiasts to explore, such as steep oak brush canyons.²⁴ The Colorado Division of Wildlife identified this area as an important calving ground for deer and elk and noted that black bears visit the area for its abundant acorns and choke cherries.²⁵ The Priest Mountain area is also the headwaters for the town of Hotchkiss, the Redland Mesa water system and Fruit Growers Reservoir.

Priest Mountain is also part of what's known as the "North Fork coal mining area" in the Grand Mesa, Uncompangre, and Gunnison National Forests. Under the proposed rule, "longterm temporary roads" and coal mining and exploration would be allowed in about 29,000 acres of the area. ²⁶ The draft rule specifically states that the North Fork area is open to future development. This opens the door to future leasing and new habitat-fragmenting roads in some of Colorado's last intact forests.

The same danger applies in the region known as the Clear Fork Divide. It is an ecologically rich area that straddles the White River National Forest and the Gunnison National Forest, northwest of Aspen, and the renowned Maroon Bells Wilderness Area. This complex of nearly 100,000 acres of roadless forests is heralded for its backcountry hunting opportunities and it is an important calving area for elk. A wide range of vegetation can be found, including sprucefir, aspen, pinion-juniper, and sagebrush. Thompson Creek, one of seven roadless areas making up the complex, provides intact habitat for bear and the endangered Canada lynx. The Colorado River cutthroat trout can also be found through the roadless complex. Unfortunately, this region is

one of the most threatened under the proposed U.S. Forest Service rule for Colorado. The Wilderness Society reported in August 2006 that 20,000 acres of roadless areas had been leased to oil and gas companies, including the Clear Fork Roadless Area.²⁹ The Pew Environment Group identified forty-five of these so called "gap leases" in the Clear Fork Divide that could allow for road building under a loophole created by the wrangling in the courts. However, the proposed rule does not address these threats.³⁰



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Conclusion

Stunning beauty, pristine habitat, clean water, countless opportunities for hunting, fishing and recreating—America's national forests are an invaluable resource and they should be treated as such. Decades of development have put undue stress on our forests, and what little we have left is vanishing quickly. Roadless forests represent some of the last strongholds of the great American wilderness, and these precious sanctuaries must be protected.

Unfortunately, eight years of bad policy and legal wrangling have left our forests vulnerable to the threat of special interests. The bulldozers and chainsaws are ready at the edge of forests across the country, including Oregon, Colorado, Alaska and Idaho. Unless the administration takes immediate action, roads built for logging, mining, and drilling will crisscross these landscapes.

With an environmentally friendly administration in place, this is the time to protect our forests for future generations. Secretary Vilsack, Obama's pick to oversee the Forest Service, has the power to stop all of these projects. He must implement a "time out" on all projects in roadless forests, including Alaska's Tongass National Forest, to ensure that policies of the past eight years don't result in clear-cutting projects on the new administration's watch.

Secretary Vilsack should issue a directive that requires Secretarial-level approval of any U.S. Forest Service projects in roadless forests. A similar directive was set by U.S. Forest Service Chief Dale Bosworth in 2001. A "time out" would be in-line with President Obama's support for the Roadless Rule as a U.S. Senator and during his campaign for the presidency. Furthermore, a "time out" is necessary to ensure that these public lands—including those outlined in this report—will not be threatened while the federal courts' conflicts are resolved and more permanent protections can be implemented.

By implementing a "time out", Secretary Vilsack will have the time to unravel the mess that the administration inherited and take necessary steps to fully reinstate the Roadless Rule. After all, with roadless forests you don't get a second chance—once they are gone, they are gone forever.

Methodology

We looked at government documents detailing proposed logging, mining and road building projects in roadless forests. We used the Forest Service website's listings of Environmental Impact Statements and other planning documents to determine the timeline and scope of each project. This analysis includes projections for acres affected and miles of roads built in roadless national forests when these projects are completed.



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CREDITS

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