



January 31, 2022

Representative Russ Fulcher  
Att: Matthew Keenan  
1520 Longworth HOB  
Washington, D.C. 20515

#### HR 1755 - Northern Rockies Ecosystem Protection Act

Dear Mr. Keenan;

Please accept this correspondence as the vigorous opposition of the Organizations above to the Northern Rockies Ecosystem Protection Act ("the Proposal"). The sheer size of the Proposal continues to astonish the Organizations as it is 23 million acres of land where multiple use opportunities would be lost entirely or hugely restricted for reasons that often directly conflict with the stated desire of the Proposal. These would be closures and restrictions in an area of the Country that already has some of the highest levels of restrictions and closures for public lands. Many of the lands that would be restricted are currently providing globally recognized recreational opportunities for all interests, and many of these activities have been previously protected by Congress as the result of earlier collaborations. Given the scale of the Proposal, these are very difficult to discuss with any detail and we believe have already been the subject of exceptional local input. The Organizations support the opposition to these closures that has been provided by the motorized community. The Organizations are attempting with these comments to highlight impacts and concerns that may be overlooked and may have more far-reaching impacts to all activity in and around the areas proposed to be restricted.

Many of the areas where access is proposed to be closed have high densities of multiple use trail networks for summer usage and heavily used areas providing globally recognized snowmobile opportunities. These are areas and trails that have been through multiple rounds of travel management by the land managers and found to be sustainable. These are globally important recreational opportunities that are highly valued by our members and these opportunities would be crushed by the Proposal. While these recreational interests are highly valued by our members the serious negative impacts of the Proposal extend beyond recreation and the Proposal will have a hugely chilling effect on the ability to collaborate on any issue in the region in the future.

The Organizations vigorously assert that previous Congressional decisions to designate Wilderness are as important as Congressional decisions *not* to designate areas as Wilderness or protect non-Wilderness multiple uses in these areas. The Proposal fails to recognize previous collaborations and casts this balance aside and for that reason alone we would object to the Proposal. Our members have spent decades in collaborations such as those previously undertaken in the planning area and these collaborations have sought to close many areas that were protected for multiple use in previous collaborations. Many of these discussions would be reopened by Proposal. However, our concerns around the Proposal go well beyond the disregard for previous collaborations that has been exhibited in the Proposal.

Our concerns basis for opposition to the Proposal ranges far beyond local collaborations and encompasses national collaborations and other efforts that have occurred before and during the more than 30 years of the proposal existence. Rather than adopt the consensus driven process that has moved dozens of land management packages over the 30 years this bill has been in existence, the Proposal has remained on its single-minded path that simply fails to recognize the diversity of interests in the area. While this Proposal has been around for an extended period of time, the Proposal fails to recognize the many Congressional successes that have occurred on the lands that it seeks to now functionally close to the public. Rather than recognize the success of

these other collaborative efforts, the Proposal twists these efforts in an attempt to create the appearance of support for the extreme nature of the Proposal.

### **1. Who we are.**

Prior to addressing the specific concerns the Organizations have regarding the Proposal, we believe a brief summary of each Organization is needed, in order to fully understand why we are concerned as this concern is based on decades of on the ground experience with the travel process rather than abstract concepts. The Colorado Off-Highway Vehicle Coalition ("COHVCO") is a grassroots advocacy organization of approximately 2,500 members seeking to represent, assist, educate, and empower all OHV recreationists in the protection and promotion of off-highway motorized recreation throughout Colorado. COHVCO is an environmental organization that advocates and promotes the responsible use and conservation of our public lands and natural resources to preserve their aesthetic and recreational qualities for future generations. The TPA is an advocacy organization created to be a viable partner to public lands managers, working with the United States Forest Service (USFS) and the Bureau of Land Management (BLM) to preserve the sport of motorized trail riding and multiple-use recreation. The TPA acts as an advocate for the sport and takes the necessary action to ensure that the USFS and BLM allocate a fair and equitable percentage of public lands access to diverse multiple-use trail recreational opportunities. Colorado Snowmobile Association ("CSA") was founded in 1970 to unite winter motorized recreationists across the state to enjoy their passion. CSA has also become the voice of organized snowmobiling seeking to advance, promote and preserve the sport of snowmobiling through work with Federal and state land management agencies and local, state and federal legislators telling the truth about our sport. CORE is a motorized action group dedicated to keeping motorized trails open in Central Colorado and the region. Idaho Recreation Council("IRC") is comprised of Idahoans from all parts of the state with a wide spectrum of recreational interests and a love for the future of Idaho and a desire to preserve recreation for future generations. Collectively, TPA, CSA, CORE, IRC and COHVCO will be referred to as "The Organizations" for purposes of these comments.

## **2. The Proposal provides a horribly twisted version of previous collaborative efforts.**

Throughout this effort, Proponents have asserted broad collaborative efforts that developed wide-ranging community support for the Proposal, but from our position that could not be further from the truth. The Organizations vigorously assert the Proposal fails to provide any diversity of community support and horribly twists the conclusions of previous community driven collaborations. The value of this statement cannot be overstated to the Organizations as our members have participated in the development of balanced land management proposals that have actually passed Congress into law. Often these Proposals have taken decades of hard work to develop and have actually struck a balance of designating Wilderness, releasing areas from WSA type designations and protecting multiple use areas. These are highly valuable simply as a model of dispute resolution.

It is from this position of long effort and hard work to develop truly collaborative proposals we can raise many of these concerns and state our vigorous opposition to the Proposal, as this Proposal does none of these things. Rather these historical successes are sought to be ignored in an effort to achieve the goals and desires that were not achieved or supported in previous Legislation. This is concerning due to the fact that passage of the Proposal would further divide interests in the region, and alignment of these interests is more critical than ever before given the challenges being faced such as catastrophic wildfire.

### **3(a). Previous Congressional Action protecting multiple use trails is changed by the Proposal.**

The Proposal's negative impacts to multiple uses is expanded because the Proposal is not just a Wilderness bill but also designates many exclusionary corridors connecting Wilderness areas. Often a horribly twisted interpretation of these large-scale multiple use efforts is provided to support these assertions. This directly conflicts with other Congressional designations that have actually had diverse support, such as the designation of the Continental Divide Trail and the passage and development of the National Trails System Act. Recently there has been significant controversy created by those who have sought exclusionary standards for routes that have been designated under the NTSA such as the CDNST, these Congressional protections of multiple uses

was recently reaffirmed in the Cowpasture Supreme Court decision. In the 7 to 2 ruling entitled US Forest Service vs. Cowpasture River Preservation Association<sup>1</sup>, the US Supreme Court reaffirmed Congressional protection of these areas for multiple uses as clearly mandated in the National Trail System Act.

Unfortunately, the Proposal does not seek to address these type balanced values, but rather continues in the development of the extreme restrictions that were struck down with the passage of the NTSA and were again displayed in the Cowpasture decision. The Organizations believe it would be a tragedy to lose multiple use access to these areas so soon after an unprecedented victory for multiple use with the Supreme Court. Also, the Organizations are unable to glean any relationship between the CDNST being located in an area, which is a multiple use resource identified by Congress and confirmed by the US Supreme Court, with the management that is being proposed.

**3(b). State Wilderness Acts were passed with a clearly stated Congressional desire to resolve Wilderness designations.**

The ongoing twisting of previous successful collaborations by Proponents starts with their failure to address the passage of the Idaho Wilderness act in 1980, which as FAR more than just a Wilderness designation. Even as far back as 1980 there was a strong desire to balance the desire to protect resources and the desire to utilize these resources to provide the globally recognized recreational opportunities that are synonymous with this area. The provisions of the Idaho Wilderness Act specifically address this desire to resolve this balance as follows:

“(b) The purposes of this Act are to...

(2) end the controversy over which lands within the central Idaho region will be designated wilderness-thereby assuring that certain adjacent lands better suited for multiple uses other than wilderness will be managed by the Forest Service under existing laws and applicable land management plans; and (3) make a

---

<sup>1</sup>See, [18-1584 United States Forest Service v. Cowpasture River Preservation Assn. \(06/15/2020\) \(supremecourt.gov\)](#)

comprehensive land allocation decision for the national forest roadless areas of the central Idaho region.”<sup>2</sup>

Similar provisions are present in each of the State Wilderness Acts that have been passed by Congress and this provision alone is a strong indication of the collaboration of interests that went into these Proposals as resources were protected and other resources were identified for usage and that usage was protected. Many of the boundaries were drawn to avoid unnecessary impacts on multiple uses in the area and to facilitate the development of these resources. The current Proposal has no such balance in the discussion, which is strong reason for opposition from the Organizations. Rather than creating broad community support, the Proposal is destroying efforts that resulted from broad community efforts.

**4. The Proposal designates Wilderness in many areas that have been found unsuitable for Roadless twice and destroys previous Congressional resolution of Roadless management issues.**

The collaborative efforts throughout this region to balance resource protection and resource utilizations have extended beyond the efforts of just Congress, and again these efforts are twisted by the Proponents in an attempt to create the appearance of support for the Proposal. Any assertion of support for the Proposal from the Roadless Rule efforts is misplaced both factually and legally. The National Roadless Rule specifically protects multiple use management in Roadless areas. This is clearly stated in the Purpose statement for the National Roadless Rule as follows:

**“§ 294.10 Purpose.** The purpose of this subpart is to provide, within the context of multiple use management, lasting protection for inventoried roadless areas within the National Forest System.”<sup>3</sup>

---

<sup>2</sup> See, Idaho Wilderness Act §2b -Public Law 96-312(1980)

<sup>3</sup> See, 36 CFR 294.10

With such a clear statement of the relationship of a Roadless area and the multiple use mandates of the land managers, the Organizations are simply unable to identify any factual or legal basis for the assertions that Roadless and Wilderness areas proposed are in any way related. They simply are not. The National Roadless Rule also specifically allows motorized trails to be built in a Roadless area as follows:

“A trail is established for travel by foot, stock, or trail vehicle, and can be over, or under, 50 inches wide. Nothing in this paragraph as proposed was intended to prohibit the authorized construction, reconstruction, or maintenance of motorized or nonmotorized trails that are classified and managed as trails pursuant to existing statutory and regulatory authority and agency direction”<sup>4</sup>

Given these clear statements of intent around the Roadless Rule, the Organizations must question as asserted basis in the Roadless area inventory process or regulations. They simply are not there and the Proposal would greatly expand the impacts of merely inventorying any areas for possible roadless designation.

Some states in the Proposal area have sought significantly more flexibility in Roadless area management than was provided in the National Rule. The Idaho Roadless Rule was developed to provide additional flexibility in the management of these areas to address new and extensive challenges in these areas. This desire for more flexibility than the National Roadless rule was stated as follows:

“Therefore, the Department has elected to maintain the flexibility the multiple theme approach allows and has retained it in the final rule.”<sup>5</sup>

---

<sup>4</sup> See, Special Areas; Roadless Area Conservation; Applicability to the National Forests /Vol. 66 Federal Register No. 9; Friday, January 12, 2001 at pg. 3251.

<sup>5</sup> See, Special Areas; Roadless Area Conservation; Applicability to the National Forests in Idaho; 73 Federal Register No. 201; Thursday, October 16, 2008 at pg. 61464.

The Idaho Roadless Rule effort sought more flexibility on a wide range of issues associated with Roadless areas, such as fuels management and chose to specifically address many of the new tools developed to address these issues with high levels of specificity. An example of this desire for greater flexibility on fire issues would be specific discussions of tools such as community wildfire protection plans in the Rule. With regard to Community Wildfire Protection plans the Idaho Roadless Rule clearly stated the desire to provide this type of management flexibility as follows:

“Instead, this rule provides the flexibility needed to implement Community Wildfire Protection Plans (CWPPs) where consistent with this rule and allows for limited treatment of hazardous fuels that threaten at-risk communities and municipal water supply systems.”<sup>6</sup>

These areas have also gone through numerous rounds of site-specific inventories for identification of areas with Roadless characteristics. The entire region was reviewed as part of the updated 2001 National Roadless effort and in 2008 Idaho embarked on its own consensus driven effort to develop its own roadless rule that allowed for more flexibility than the national rule. As an Inventoried Roadless area is very different than Wilderness, as a Roadless designation is an inventory of characteristics of the area and not a management decision. Wilderness is a management designation.

Many of the areas that are proposed to be designated Wilderness have been identified as unsuitable for Roadless designation after intensive site-specific inventory by land managers. The conclusions of what is decades of effort have identified large portions of the Proposal areas as unsuitable for Roadless designations, but the Proposal would designate these as Wilderness anyway. This is another issue that the Proponents of the Legislation simply twist to align with their desires despite the lack of factual basis for the assertion. Many areas are proposed to be

---

<sup>6</sup> See, Special Areas; Roadless Area Conservation; Applicability to the National Forests in Idaho; 73 Federal Register No. 201; Thursday, October 16, 2008 at pg. 61466



Wilderness simply because they were inventoried at one point for possible Roadless characteristics.

Rather than recognize the collaborative nature of these Roadless efforts and specific Congressional statements of the desire to end the fighting on these types of designations, §503 of the Proposal would reopen this fight on literally millions of acres with its mandate of new roadless inventories and designations. While the Organizations support the concept of Roadless areas, as they specifically allow motorized usages and do not change multiple use mandates, the Organizations are also very concerned that these new §503 Roadless areas would simply seek to be designated as Wilderness in the future. These designations would again occur regardless of how the Roadless inventory process concludes.

**5(a). The 30x30 concept is irrelevant to Proposal as federal public lands protection levels exceed 50% in the Proposal area.**

The Organizations are aware of the never-ending barrage of media around the Proposal which often states the 30x30 requirements is a primary reason for the Proposal.<sup>7</sup> As a general concept this also makes absolutely no sense as Idaho is state with massive portion of Wilderness and Roadless areas. This is far in excess of 50% of the federal land mass, so we must question why the 30X30 concept is relevant, unless we are talking about removing protections in the area. If there is expansion of the 30x30 concept to protections on private lands, this Proposal is a step in the wrong direction for that goal given the huge amount of conflict that the Proposal continues to have with a wide range of interests. Private lands protections are only achieved in voluntary partnerships with property owners and lands managers, and these voluntary partnerships are undermined by efforts like the Proposal. The Proposal simply does not aid in the creation of relationships like this.

---

<sup>7</sup> As an example: [The Northern Rockies Ecosystem Protection Act will help achieve 30x30 goals - WildEarth Guardians](#)

**5(b). President Biden's 30x30 Executive Order is more balanced than the Proposal.**

We are aware that the 30x30 concept was memorialized by President Biden with the issuance of Executive Order 14008 on January 27, 2021. President Biden's Executive Order 14008 also clearly identified the **goal of improving recreational access five separate times**. The Proposal fails to come close to the type of balance that was provided even this EO. Rather than improving recreational access and economic benefits, the Proposal significantly restricts these types of issues. Again, we must question the factual basis for any assertion of the 30x30 concept supporting the Proposal.

**6. The wildlife "Connecting Corridor" concept is unprecedented and completely unnecessary.**

The Proposal also seeks to create an entirely new designation of protection for public lands, mainly the Connecting Corridor. This concept is poorly defined as it merely states it is connecting habitat areas that are identified by the USFWS. The lack of definition around this concept is astonishing as at no point can we determine how corridor boundaries are drawn; why they are thought to be necessary as a permanent designation or what these corridor areas are being protected from.

The failure of the current definition of the Corridor concept as a management tool is immediately apparent when these concepts are applied more generally as almost any two areas in the nation could be identified as a corridor for species connectivity regardless of what is in the corridor. Often major cities are between habitat areas for species, and under the current definition, these types of barriers to wildlife could be designated as Corridor. This makes absolutely no sense whatsoever.

The need for a year-round designation for the protection of these areas fails to make sense as often Corridors are only used by wildlife on a seasonal basis. Most of the time the wildlife is not in these corridor areas but are rather using their habitat areas, that is why there is two different management designations. The Organizations are also concerned that the Proposal is seeking to

exclude activities that simply are not a barrier to the wildlife traveling in the migration corridors, such as permanently closing trails in the corridor areas. This assertion is simply comical as wildlife that is traveling hundreds of miles between seasonal habitat areas will not see trails as a barrier.

Rather our experiences have been exactly the opposite in areas that are heavily impacted by the pine beetle as roads and trails that are maintained are the only way that wildlife can traverse these areas due to the huge amounts of downed trees. This type of management would be entirely prohibited in these areas without explanation. The proposed management of timber and routes in these areas fails to recognize the negative impacts from this type of prohibition may have on federally listed species such as the lynx. Without basic management these areas are ripe for wildfire impacts and the long-term impacts of burn scars on wildlife has become the topic of significant new research. This research found that while some species return quickly to burn scars, other species such as the Lynx avoid these areas completely for extended times, often years.<sup>8</sup> These are impacts that the Proposal would make worse rather than better as claimed.

Not only does the Corridor proposal seek to manage uses that simply are not barriers to the wildlife migration, the Proposal will draw resources away from management of issues that are actually barriers to the wildlife movement. The implications of trails are comically small on migratory wildlife but the impacts of high-speed arterial roads are significantly worse but can also be managed. The success of active management, which would now be prohibited in these areas, was recently highlighted by the Western Governors Association report entitled “State, Federal, Local and Private Entities Collaborate to Build Wildlife Crossings along a 12-Mile Stretch of Highway 89 in Southern Utah”.<sup>9</sup> As a result of the partnerships that developed this active management, literally thousands of deer per year were saved in this location alone. It is the Organizations position that this is the type of management that should be pursued and

---

<sup>8</sup> See, USDA Forest Service; Squires et al; HABITAT RELATIONSHIPS OF CANADA LYNX IN SPRUCE BARK BEETLE-IMPACTED FORESTS; Analysis Summary; 19 March 2018. A complete copy of this research is available here: [Canada lynx navigate spruce beetle-impacted forests | Rocky Mountain Research Station \(usda.gov\)](#)

<sup>9</sup> A copy of this report is available here. [WGA-Utah-Case-Study-April-2014-1.pdf](#)

proposals such as this simply detract from these efforts as they undermine the building of partnerships that are critically necessary for efforts such as those highlighted in the WGA report.

## **7. Economic impacts of closures will crush local communities.**

The Organizations are amazed that supporters of the Proposal continue to assert significant economic protections for local communities, which is so completely lacking in factual basis as almost not warrant discussion. The Organizations are also aware that even without factual basis often this kind of misinformation becomes the message on the issue if it is not rebutted. An example of this assertion would be found on the alliance for the Wild Rockies website, which makes the following assertion:

“Visitors spending within the National Forest System provides more than 200,000 jobs contributing approximately \$13.6 billion to the nations gross domestic product each year.

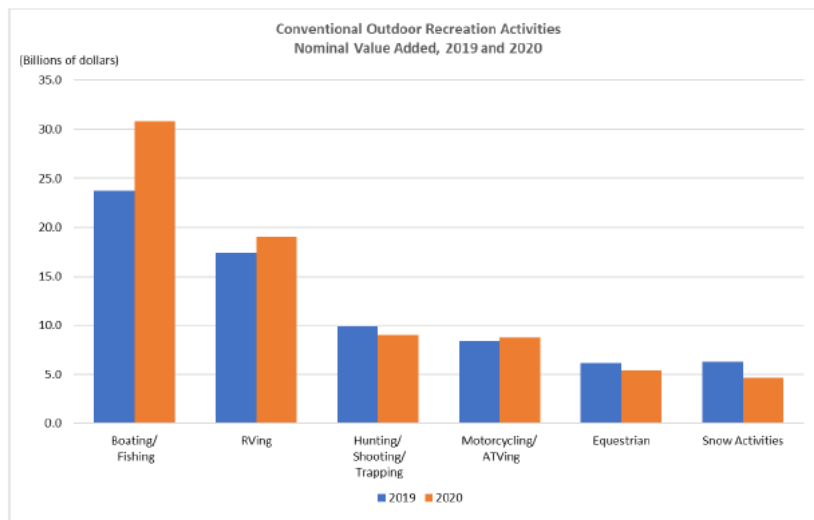
### **Increase Outdoor Recreation revenue.**

Outdoor recreation contributes more that \$646 billion annually to the economy, supports 61 million jobs and generates nearly \$80 billion in federal, state and local taxes.” <sup>10</sup>

The Organizations don’t question these landscape level conclusions about the impact of multiple use recreation at the national level, however we VIGOROUSLY question how this information supports the Proposal in any way. We submit this information does not support the Proposal and certainly does not increase outdoor recreational revenues, which is immediately evident when there is a deeper analysis of the information performed. The Dept of Commerce Bureau of Economic analysis annually publishes a national report on the economic contributions of all forms of recreation to the nation. In the 2021, this report also recognized the 5 primary activities that drive this economic engine, which are identified as follows:

---

<sup>10</sup> See, Alliance for the Wild Rockies website [Benefits - Alliance For The Wild Rockies](#) accessed 1/31/22



U.S. Bureau of Economic Analysis

Additional value added by activity highlights for 2020 include:

- **Boating/fishing** was the largest conventional activity for the nation as a whole at \$30.8 billion in current-dollar value added and was the largest conventional activity in 39 states and the District of Columbia. Florida (\$3.8 billion), California (\$2.8 billion), and Texas (\$2.8 billion) were the largest contributors to U.S. value added for the activity (state table 2).
- **RVing** was the second-largest conventional activity nationally at \$19.1 billion in current-dollar value added and was the largest conventional activity in five states. The largest contributors were Indiana (\$3.4 billion) and Texas (\$1.7 billion).
- **Snow activities** was the largest conventional activity in Colorado (\$1.2 billion), Utah (\$468.0 million), Vermont (\$191.3 million), and Wyoming (\$92.2 million) in current-dollar value added. At the national level, current-dollar value added for snow activities was \$4.7 billion.

The Organizations must note that each of the top five spending profiles are hugely driven by uses that would be prohibited by the Proposal. Some of these uses are inherently motorized, such as motorcycling/Atving or RVing, while others are on the list because of the motorized component of the recreation, such as fishing or hunting. The Organizations are aware that the purchase of motorized equipment for hunting and fishing have consistently been identified as the primary spending profile for these activities by the US Fish and Wildlife Service.<sup>11</sup> Similar highly credible researchers, such as the Western Governors Association have undertaken similar research and have arrived at similar conclusions.<sup>12</sup> Many of the asserted users that proponents assert will drive the economic stability of these communities simply don't even make the list. This should be cause for major concern about the accuracy of an assertion of economic stability from the Proposal.

<sup>11</sup> See, DOI; US Fish and Wildlife Service; 2011 National Survey of Fishing, Hunting, and Wildlife-Associated Recreation; National Overview ; Issued August 2012 at pg. 12 note #4.

<sup>12</sup> See, Western Governors Association; Get Out West Report; Managing the regions recreational assets; June 2012

The exceptionally low spending profiles of those that choose the Wilderness type recreational type experience is compounded by the fact that there simply are not many people seeking this type of experience. The lands where access is proposed to be restricted are intimately familiar with the economic impacts of people not showing up to pursue recreational activities, and this is exemplified by the closures to Yellowstone NP to most forms of recreational visitation in the winter. What had been consistently vibrant winter communities on the boundary of the park were immediately transformed into ghost towns in the winter that simply struggle to provide basic services, such as schools and road maintenance. There simply are not enough visitors to support the communities without the Park providing recreational opportunities that people wanted and targeted high spending individuals.

It should be noted that when winter access to the park was functionally closed to the public, many members sought winter recreational opportunities in other locations around the park. These opportunities would now be lost as the Proposal would entirely prohibit or hugely restrict access to these areas and at levels of restriction that are simply unprecedented.

#### **8. Forest Health must be addressed before closing areas to management.**

From the Organizations perspective, one of the largest challenges to a healthy ecosystem and high-quality recreational usage of these ecosystems is the exceptionally poor forest health that is plaguing western states. Millions of acres of dead trees simply do not provide a healthy ecosystem or quality recreational experiences for anyone. The following photos are of areas that have experienced poor forest health and then subsequent intervening impacts:



These situations and conditions are simply FAR too common and are occurring at such a level as to force us to ask if the Proposal is helping mitigate or ease management of these conditions. First land managers specifically and consistently conclude that these challenges can be managed.

<sup>13</sup> The Organizations would note that the Proposal would be a significant barrier to the effective management of areas such as this for any activity.

The 2020 Idaho State Department of Lands provided the following state level summary maps of areas that are impacted by forest health issues: <sup>14</sup>

---

<sup>13</sup> A complete copy of this report is available here: [ID12.indd \(uidaho.edu\)](#)

<sup>14</sup> See, Idaho Dept of Lands; *2019 Forest Health Highlights Report*; 2020 at pg. 3.





Given the size and intensity of the impacts we are now identifying, we must question why more effort is not behind directed towards managing these issues or at least avoiding management that might contribute to these issues. The proposal would be one such concept that probably should be avoided.

The Organizations vigorously assert that the overlap of the areas hard hit by poor forest health issues and the areas that are proposed to have greatly expanded management restrictions cannot be overlooked. This simply makes no sense, and the Organizations assert that before any restrictions are implemented these areas should at least be stable for the foreseeable future. This type of basic forest management is critical to all forms of recreation as often these areas of poor forest health are far more prone to catastrophic wildfires. These wildfires often can close recreational access to areas impacted by the fires for decades or more. Often the impacts of these fires can range well beyond the boundaries of Wilderness and other restrictions and destroy watershed and other resources hundreds of miles from the direct burn scar.

#### **9. Conclusion.**

Please accept this correspondence as the **vigorous** opposition of the Organizations above to the Northern Rockies Ecosystem Protection Act (“the Proposal”). The sheer size of the Proposal continues to astonish the Organizations as it is 23 million acres of land where opportunities would be lost entirely. These would be closures and restrictions in an area of the Country that already has some of the highest levels of restrictions and closures for public lands. Many of the lands that would be restricted are currently providing globally recognized recreational opportunities for all interests, and many of these activities have been previously protected by Congress as the result of earlier collaborations. Given the scale of the Proposal, these are very difficult to discuss with any detail and we believe have already been the subject of exceptional local input and we support the opposition to these closures that has been provided by the motorized community. The Organizations are attempting with these comments to highlight impacts and concerns that may be overlooked and may have more far-reaching impacts to all activity in and around the areas proposed to be restricted.

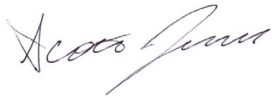
Many of the areas where access is proposed to be closed have high densities of multiple use trail networks for summer usage and heavily used areas providing globally recognized snowmobile opportunities. These are areas and trails that have been through multiple rounds of travel management by the land managers and found to be sustainable. These are globally important recreational opportunities that are highly valued by our members and these opportunities would be crushed by the Proposal. While these recreational interests are highly valued by our members the serious negative impacts of the Proposal extend beyond recreation and the Proposal will have a hugely chilling effect on the ability to collaborate on any issue in the region in the future.

The Organizations vigorously assert that Congressional decisions to designate Wilderness are as important as Congressional decisions not to designate areas as Wilderness or protect non-Wilderness multiple uses in these areas. The Proposal fails to recognize previous collaborations and casts this balance aside and for that reason alone we would object to the Proposal. Our members have spent decades in collaborations such as those previously undertaken in the planning area and these collaborations have sought to bring closure to so many of the discussions the Proposal would reopen. However, our concerns around the Proposal go well beyond the disregard for previous collaborations that has been exhibited in the Proposal.

Our concerns basis for opposition to the Proposal ranges far beyond local collaborations and encompasses national collaborations and other efforts that have occurred before and during the more than 30 years of the proposal existence. Rather than adopt the consensus driven process that has moved dozens of land management packages over the 30 years this bill has been in existence, the Proposal has remained on its single-minded path that simply fails to recognize the diversity of interests in the area. While this Proposal has been around for an extended period of time, the Proposal fails to recognize the many Congressional successes that have occurred on the lands that it seeks to now functionally close to the public. Rather than recognize the success of these other collaborative efforts, the Proposal twists these efforts in an attempt to create the appearance of support for the extreme nature of the Proposal.

If you have questions, please feel free to contact Scott Jones, Esq. His phone is (518)281-5810 and his email is [scott.jones46@yahoo.com](mailto:scott.jones46@yahoo.com) or Chad Hixon at (719)221-8329 or his email is [chad@coloradotpa.org](mailto:chad@coloradotpa.org).

Respectfully Submitted,



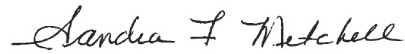
Scott Jones, Esq.  
CSA Executive Director  
TPA/COHVCO Authorized Representative



Chad Hixon  
Executive Director – TPA



Marcus Trusty  
President – CORE



Sandra Mitchell  
Executive Director – IRC