

**PART 1: General Comments - Specific to all National Forests in Colorado.**

**Executive Summary:**

**Background:** *The Colorado Division of Wildlife is the primary state agency responsible for wildlife and wildlife management in the State of Colorado. The United States Forest Service is responsible for management of Inventoried Roadless Areas on National Forests in Colorado. Inventoried Roadless Areas are not necessarily areas 100% free of roads. Rather they are generally undeveloped areas identified by the Forest Service, in a process beginning in the 1970s and contained in a set of map (ref. 66 Fed. Reg. at page 3250. Some may contain existing roads but still retain a generally undeveloped character. These areas have received special management attention for decades. Two recent significant events have occurred that impact these areas. First, on January 5, 2005, a new final forest planning rule was published. This rule does require a review of roadless areas that might be suitable for wilderness designation when existing forest plans are revised but otherwise does not address management of them. Therefore, although unclear at present, it is a possibility that future regulatory direction for the management of current inventoried roadless areas reviewed and either found not suitable for wilderness designation or not recommended for wilderness designation may result in that roadless area's migration from special recognized status with nationwide protections to potentially having no special status or even separate mention in the new Forest by Forest planning regulations. With these new planning regulations, what future management protections, if any, that may apply to these currently inventoried roadless areas is not clear. The second significant event occurred on May 13, 2005. The final roadless area regulations were published in the Federal Register at 70 Fed. Reg. 25,654. This new rule repealed and replaced the previous rule and established a procedure that permits a Governor of a state to submit a petition to the U.S. Secretary of Agriculture to promulgate a special rule for the management of roadless areas in that state, but it contains no standards by which the Secretary is to review a state's recommendations. Regardless, petitions are required to provide specified information such as (1) description of the particular lands for which a petition is made; (2) particular management recommendations; (3) identification of the circumstances and needs intended to be addressed; (4) information and how recommendations differ from the relevant federal plans and policies; (5) how the recommendations compare to state land policies and management direction; (6) how the recommendations would affect fish and wildlife and habitat; (7) a description of any public involvement efforts undertaken by the state during development of the petition; and (8) a commitment by the state that it will participate as a cooperating agency in any environmental analysis for the rulemaking.*

*The purpose of this document is to supply that specified information in those eight sections.*

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**Summation of Field Comments:**

*Regardless of the unclear future management direction and/or protections to be afforded Inventoried Roadless Areas, and recognizing the extreme diversity of potential demands on these area, the professional field managers and biologists\* believe that it is in the state's overall best interests that every Inventoried Roadless Area reviewed in Colorado to date should be managed to best meet the Colorado legislative mandate found at 33-1-101, our mission, and our strategic plan; therefore, it is the consensus opinion based on science, local expertise and sound knowledge that all Inventoried Roadless Areas in Colorado should be protected, preserved, enhanced, managed and maintained in a manner that provides the maximum benefit for wildlife and wildlife habitat, and that in-turn can then provide significant return benefits to local and distant citizens and to forest visitors.*

*This Colorado Division of Wildlife Petition Content Worksheet is a document in progress that will continue to grow size and scope with the Inventoried Roadless Area Task Force Process until the last official Task Force meeting. It chronicles the field's general and specific comments specific to the eight listed requirements in the Federal Register and mentioned in summary above. This document is presented in two Parts, a General Part 1 that applies in general to all of Colorado's USFS Inventoried Roadless Areas and a more Specific Part 2 that discusses explicit characteristic of specific roadless areas.*

*We appreciate the efforts of the Task Force members to deliberate on these important and diverse options. We believe that land stewardship, protecting ecosystems, and providing quality habitat for the range of wildlife species that exist on Colorado's Inventoried Roadless Areas will result in the conservation of our state's valuable assets, and so benefit every citizen.*

**CLARIFICATION:**

**For the convenience of those reading this document, note this clarification:**

**Please allow any mention of the Colorado Division of Wildlife, (or any reference of "we," "our," etc.) to refer specifically to our Field Operations Branch personnel, (District, Area, Assistant and Regional Wildlife Managers) and the Wildlife Protection Branch biologists (representing terrestrial, aquatic and conservation sections), as well as the designated Inventoried Roadless Area Project Manager. Comments and recommendations contained herein are based on the agency mandate, mission and internal guiding plans; they are founded in science, and represent an earnest effort to support this process.**