



Boulder County Nature Association
P.O. Box 493, Boulder, Colorado 80306

9 March 2006

The Keystone Center
ATTN: Roadless Areas Review
1628 Sts. John Road
Keystone, CO 80435

To whom this may concern,

The Boulder County Nature Association would like to submit comments to the Roadless Areas Review Task Force in support of protecting Colorado's four million acres of U.S. Forest Service roadless areas, and on the Arapaho-Roosevelt National Forest in particular. BCNA is a private nonprofit organization committed to studying and preserving the natural history of Boulder County and adjacent areas of the Colorado Front Range. We conduct field studies of wildlife and native plant communities; provide natural history information to public agencies; offer field ecology classes; and organize an annual ecosystem symposium. For over twenty-five years BCNA has been involved in analyzing and commenting on public land planning.

There is little doubt that roads are one of the greatest threats to the ecological integrity of natural areas. Whether one is studying plants or animals, the empirical evidence is irrefutable that native species are healthier and more abundant in roadless areas. These observations are borne out by numerous wildlife and botanical surveys, and quantitative studies that document erosion rates, water quality, human induced fires, weed encroachment, and incidents of poaching.

Each individual roadless area in Colorado is important to the wildlife, economy, and overall vitality of Colorado's landscape. Like many citizens of this state, we view the protection of roadless areas as critical to our quality of life, our livelihood, and to what we will bequeath to our children. BCNA hopes the task force will recommend the fullest protection of these areas. In particular, we hope you will place priority on two criteria: size, and the role an area plays in maintaining connectivity. Conservation biology has conclusively demonstrated these two factors are critical for the protection of native species and the maintenance of ecological services on which we all depend.

Fifty-eight roadless areas on the Arapaho-Roosevelt National Forest are under evaluation by the task force. These range in size from over 42,000 acres to less than 100 acres. Sixteen of these areas are greater than 10,000 acres, an expanse large enough to support healthy populations of wildlife and to help ameliorate habitat fragmentation, while also playing a role in safeguarding water quality, soil health, and quietude. There must be a compelling set of overriding factors to not secure the protection of any area 10,000 acres or greater.

The sixteen areas on the ARNF greater than 10,000 acres are: Green Ridge – East; Williams Fork; Gray Rock; Bard Creek; Never Summer Adjacent Area; Comanche Peak Adjacent Unit O; Green Ridge – West; Indian Peaks Adjacent Area; North St. Vrain; Copper Mountain; Byers Peak; Cherokee Park; Kelly Creek; North Lone Pine; Comanche Peak Adjacent Unit E; and White Pine Mountain.

In addition, the Troublesome roadless area on the Routt National Forest is adjacent to the ARNF, and at 107,800 acres has tremendous ecological value as core habitat and as a key linkage between the ARNF/Rocky Mountain National Park ecosystem and roadless habitat in western Colorado.

Of the 42 areas on the ARNF less than 10,000 acres in extent, virtually all are adjacent to existing Wilderness. Safeguarding these smaller roadless tracts will serve to buffer the Wilderness Areas, and thereby increase habitat effectiveness, enhance ecological services, and augment linkages between core protected areas. Wildlife populations depend upon connectivity in the landscape and without it their viability is at risk. From Canyon Lakes to Clear Creek, it is essential that the ecological fabric of the ARNF be woven with threads of roadless areas, and critical linkages are protected and restored.

The Boulder County Nature Association strongly supports the protection of our remaining roadless areas. We appreciate the opportunity to offer these comments.

Sincerely,

A handwritten signature in black ink, appearing to be a stylized name or set of initials, located below the word 'Sincerely,'.

BCNA Forest Committee