

Center for Desert Archaeology – Arizona Wilderness Coalition – Trout Unlimited, Arizona Council - The Wilderness Society – Sonoran Desert Mountain Bicyclists - Great Old Broads for Wilderness – Grand Canyon Wildlands Council – Tucson Audubon Society – Public Employees for Environmental Responsibility – Sierra Club, Grand Canyon Chapter – Friends of Ironwood Forest – Wildlands Network - Center for Biological Diversity – White Mountain Conservation League – Save the Scenic Santa Ritas – El Coronado Ranch – Sky Island Alliance - Prescott Audubon Society – Conservation Lands Foundation – Defenders of Wildlife

June 6th, 2011

Dear Congressman,

We appreciate this opportunity to bring attention to pending legislation in the House of Representatives. Collectively, our organizations represent a diverse cross-section of Arizona's outdoor enthusiasts including sportsmen, mountain bikers, hikers, wildlife watchers, and wilderness advocates. Together, we would like to voice our concern regarding H.R. 1581, the Wilderness and Roadless Area Release Act. We hope you will consider our collective points of apprehension regarding this bill and choose to oppose its passage.

H.R. 1581 would dissolve the 2001 Roadless Area Conservation Rule, which underwent more than 600 public hearings across the West and still stands as one of the most popular initiatives ever facilitated by the United States Forest Service.¹ In Arizona, the "Roadless Rule" includes about 1.2 million acres of public forest land, or about 10% of our combined six National Forests. The rule is not designed – or used - to create more wilderness. Rather, it is a management option that the Forest Service uses to identify and conserve remote lands with backcountry character. Specifically, the Roadless Rule was promulgated to;

“These areas possess social and ecological values and characteristics that are becoming scarce in an increasingly developed landscape. While NFS inventoried roadless areas represent about 2% of the total landbase of the United States, they provide unique opportunities for dispersed recreation, sources of clean drinking water, and large undisturbed landscapes that offer privacy and seclusion. In addition, these areas provide a bulwark against the spread of nonnative invasive plant species, support a diversity of habitats for native plant and animal species, conserve biological diversity, and provide opportunities for study, research, and education.”

¹ The Roadless Area Conservation Rule attracted more than 1.6 million comments from residents across the country – mostly in the West. Almost all of these comments were supportive of the rule, including more than 90% of those written by more than 41,000 Arizonans.

We believe the Roadless Rule is working well for Arizonans, providing exceptional opportunities for outdoor recreation while also protecting many of the values that our state's National Forests were originally created for; namely the conservation of our watersheds and water resources. We ask for your support in allowing this decade-old rule to stand, which will retain the Forest Service's authority to continually update its roadless inventory through the Land and Resource Management Planning process.

We'd like to share additional benefits that the 2001 Roadless Rule provides;

The Roadless Rule is Fiscally Responsible

A major factor in the Forest Service's decision to initiate the Roadless Rule related to its \$8.4 billion backlog on deferred road maintenance and capital improvements (including \$307 million backlog in Arizona). With more than 400,000 miles of roads on National Forest lands (the largest network of roads under all federal jurisdictions), the agency is currently trying to reduce its public safety liability and ecological deficit caused by such an enormous system. The Roadless Rule pertains to areas where no authorized roads exist today, therefore allowing the agency to focus its attention on the current network.

The Roadless Rule Does Not Restrict Use

Inventoried Roadless Areas – while limiting the construction of new roads – does not restrict the use of motorized or mechanized equipment. For instance, mountain bikes and their associated trails are common in roadless areas, providing popular destinations for this growing recreational use. The use of chainsaws and other mechanized equipment are also not restricted, including timber stewardship contracts that are designed to restore our forests, wildlife, or provide fire protection to communities. No roads or trails have been closed as a result of the Roadless Rule, as many of these areas exist beyond trailheads or adjacent to wilderness areas.

Roadless Areas Protect our Water Resources and Fisheries

Roads have three primary effects on water: they intercept rainfall directly on the road surface or road cutbanks and intercept subsurface water moving down the hillslope; they concentrate flow, either on the surface or in an adjacent ditch or channel; and they divert or reroute water from flowpaths that it would otherwise take if the road were not present. All of these effects cause deterioration of our watersheds.² While roads are necessary in many areas, the places they do not exist are particularly important for us to maintain as roadless in order to protect our water resources.

Roadless headwaters also provide the primary source of cold, clean water for popular main stem fisheries and premium, uncrowded angling opportunities for fishermen. Because roadless areas remain largely undisturbed, it is less likely that erosion, sedimentation, and disruption of water flows will occur in those locations. Roads and off-road vehicle trails can deposit large quantities of sediment into stream channels, where it buries the gravel necessary for trout spawning, fills the spaces between rocks where aquatic insects reside, and reduces pool depths, thus raising water temperatures and mortality in native fish. Roads have unavoidable effects on streams

² Gucinski, H., M.J. Furniss, R.R. Ziemer, and M.H. Brookes. 2001. Forest roads: a synthesis of scientific information. General Technical Report PNW-GTR-509. Portland, OR: U.S. Department of Agriculture, Forest Service, Pacific Northwest Research Station. 103p.

regardless of how well they are located, designed, or maintained. It's no coincidence that most of Arizona's healthiest rivers – such as the Blue, Black, Salt, and Verde - originate in areas with few or no roads.

Roadless Areas are Good for Wildlife

Habitat fragmentation and loss are the two leading factors in the decline of wildlife. Research has long established that wildlife populations are generally healthier in areas void of roads. In a recent meta-analysis, scientists studied 234 mammal and bird species, finding a positive correlation between population density and distance from roads and other infrastructure.³ If we consider many of Arizona's emblematic wildlife such as the bighorn sheep and Sonoran pronghorn, we find that their best habitats are found in roadless areas.

Roadless Areas are Important Components of Arizona's Outdoor Economy

Recreation such as wildlife watching, backpacking, hunting, and mountain bicycling contribute billions to our state's economy, sustaining jobs in the tourism and service industry. In 2007, the Outdoor Industry Association determined that non-motorized recreation contributes \$4.1 billion to Arizona (see table below). Roadless areas, such as the northern Santa Catalina Mountains on the Coronado National Forest, are popular destinations for recreational users and often add to the amenity value of adjacent protected areas.

Arizona Residents' Participation in Outdoor Activities		
Activity	% Population Involved*	# Involved*
Bicycling	27%	1,151,671
Camping	25%	1,067,921
Fishing	7%	339,417
Hunting	3%	116,977
Paddling	7%	320,680
Snow Sports	7%	284,229
Trail Sports	27%	1,164,256
Wildlife Viewing	24%	1,098,000
Source: Outdoor Industry Foundation, <i>State-Level Economic Contributions of Active Outdoor Recreation- Technical Report on Methods and Findings</i> , April 2007		
* Do not add, there is overlap in participation in activities		
Total Expenditures	\$4.1 billion	

³ Benítez-López, A., R. Alkemade, and P.A. Verweij. 2010. The impacts of roads and other infrastructure on mammal and bird populations: a meta-analysis. *Biological Conservation* 143, 1307-1316

H.R. 1581 Would Also Dissolve Arizona's Two Wilderness Study Areas

In 1990, Congress created two Wilderness Study Areas in Arizona; the Cactus Plain WSA and the Baker Canyon WSA. The creation of both areas deferred final decisions regarding their wilderness status. H.R. 1581 would unilaterally dissolve these WSAs without any thoughtful consideration regarding why they were created in the first place and/or the justifications that support an ultimate decision. Both WSA's protect unique ecological and cultural objects and having been managed under interim wilderness guidelines for more than 20 years, neither poses controversy as a restricted area. H.R. 1581 is the wrong approach to deciding the fate of either WSA, and we ask that if you believe final decisions are warranted for these areas, a transparent and public-inclusive process ensues that would support such important decisions.

Conclusion

For more than 10 years, Arizonans have lived with and benefited from the 2001 Roadless Rule. For more than 20 years we have enjoyed our state's WSA's. The ecological, recreational, and economic benefits of unroaded areas in Arizona are straightforward and clear. While these areas represent a small fraction of our public lands, they pay large dividends to our state's health and economy. With years of public engagement and support behind them, it is not appropriate to remove protections for these areas in such a unilateral way. We ask that you oppose H.R. 1581 in its current form and allow the Roadless Rule and our WSA's to continue working for Arizona.

Please do not hesitate to contact us if we can provide additional information or answer questions you may have.

Sincerely,

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