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**NEW ROADLESS PLAN
OPENS BACKCOUNTRY TO DRILLING**

Executive Summary

The landmark Roadless Area Conservation Rule protects 58.5 million acres of America's national forests including 4.4 million in Colorado from new road-building associated with commercial logging and oil, gas and other industrial development. Issued by the Clinton administration in January 2001, it is a balanced environmental measure that does not close any existing roads or recreational trails, restrict access for private property owners, or interfere with existing leases or permits for mineral development or oil and gas operations. It also allows for new roads to be built to respond to fires and other natural disasters.

America's roadless policy has enjoyed widespread popularity since it was adopted, though timber and other extractive industries have made repeated attempts to undo it through a series of lawsuits and appeals intended to open up undeveloped areas. They succeeded in May 2005, when the Bush administration repealed the 2001 rule and replaced it with a complicated state-by-state process that required governors to petition the federal government if they wanted undeveloped national forests in their states to receive protection. But in September 2006, a federal court reinstated the original policy and it again became the law of the land. Despite the setback, the administration encouraged governors to file petitions under the Administrative Procedures Act. Of the 38 states in the nation that have national forest roadless areas, only Idaho and Colorado have participated in this process.

Given continued legal wrangling, Colorado Governor Bill Ritter, a public supporter of the roadless rule, agreed in early 2006 to participate in state-based rulemaking as an "insurance policy" to protect Colorado's 4.4 million acres of national forest backcountry.¹ However, more than two and one-half years later, the situation in the courts, in Washington and elsewhere in the West has changed dramatically, and this rulemaking has made Colorado vulnerable to new drilling for oil and gas in some of the state's best backcountry. Consider the following:

- » The Bush administration is using its final days in office to do what it has not been able to achieve during the previous seven and a half years: to repeal the roadless rule and replace it with a policy that would allow road-building and drilling in pristine areas of Colorado's national forests currently off limits to such development.
- » A little known loophole in the administration's new proposal would allow roughly 100 new oil and gas projects to proceed in roadless areas in the Grand Mesa-Uncompaghre-Gunnison, White River, San Juan and other national forests. These new leases are in addition to those recently approved by the administration on the Roan Plateau and in other pristine areas of the state.

- » The full impact of this industrial development on watersheds and valuable fish and wildlife habitats in these roadless areas has not been thoroughly assessed through a formal administrative process.
- » The amount of oil and gas that could be practically taken from *all* Colorado's national forest roadless areas represents a drop in the bucket of the country's energy needs. Analyzing recent U.S. Geological Service data, The Wilderness Society found that at current energy consumption rates, the economically recoverable natural gas in all of Colorado's roadless areas could meet total U.S. gas consumption for only 10 to 17 days. Similarly, economically recoverable oil in the state's roadless areas would fuel less than 12 hours of total U.S. oil consumption.
- » For the past two years, the roadless rule has remained the law of the land, and it is unlikely that the courts would issue a decision impacting its validity with regard to Colorado prior to 2009. Considering the current judicial climate, the need for a Colorado "insurance policy" appears increasingly unnecessary.

Ironically, the petition process endorsed by Governor Ritter to protect Colorado's roadless areas from litigation and other challenges will result instead in singling out Colorado's 4.4 million acres of backcountry forests as a target for future road-building and development, as they will be less protected than those in other states.

Governor Ritter can best serve Colorado and the nation by calling on the Bush administration to suspend its current rulemaking until there is a thorough assessment of the full impact of these new oil and gas leases on water quality, valuable fish and wildlife, outdoor recreation and the state's economic future. This prudent and precautionary step is essential to maintaining the Governor's balanced approach to energy development in the state. It also will ensure the preservation of Colorado's last pristine forests as a legacy for future generations.

Because once they're gone, they're gone forever.



LEASING COLORADO'S LEGACY

NEW ROADLESS PLAN OPENS BACKCOUNTRY TO DRILLING

Background: The Roadless Area Conservation Rule

Created by President Theodore Roosevelt in 1907, our national forests are one of America's most treasured natural resources. More than a century later, the country has 155 national forests, encompassing 192 million acres and providing sources of drinking water, critical habitat for fish and wildlife, and unique opportunities for recreation.

The rapid pace of development, particularly in the West, has put increased pressure on the national forest system. With a majority already open to logging, mining, and drilling, the Clinton administration imposed a temporary moratorium in 1998 on new road-building on roughly one-third of national forests that remained undeveloped and began a public rulemaking process to develop permanent protections. After more than 600 public meetings, a record 1.6 million public comments—the vast majority in favor of strong protections—and endorsements by members of Congress, the Roadless Area Conservation Rule was issued in January 2001.

The roadless rule protects 58.5 million acres of backcountry from new road-building associated with commercial logging and oil, gas and other industrial development. The policy does not close any existing roads or recreation trails, restrict access for private property owners or hunting and fishing, or interfere with existing leases or permits for ski areas, mineral development, or oil and gas operations. It also allows for new roads to be built to fight fires or other natural disasters.

Industry and Political Opposition

Despite the widespread popularity of U.S. roadless policy, timber and other extractive industries have made repeated attempts to repeal it through a series of lawsuits and appeals to the Bush administration to open up these undeveloped lands.

In May 2005, federal officials responded by replacing the original rule with a complicated process that required governors to petition the U.S. Department of Agriculture (USDA) if they wanted to preserve roadless national forests in their states.

This approach was criticized by governors, including many in the West, who called for the roadless rule to be reinstated. In a letter to then Secretary of Agriculture Ann Veneman, governors of New Mexico, Arizona, Washington and six other states wrote: "As Governors, we believe you should take a national approach to protecting these forests, consistent with the Roadless Area Conservation Rule... . We see no reason to eliminate the Roadless Rule and many reasons to keep and defend it."²

California's Governor, Arnold Schwarzenegger, also refused to reduce roadless area protections in the state's national forests through the Administration's petition process and instead committed to ensuring

"As Governors, we believe you should take a national approach to protecting these forests, consistent with the Roadless Area Conservation Rule... . We see no reason to eliminate the Roadless Rule and many reasons to keep and defend it."

that they would not be developed, declaring, "California's forests are one of our state's most treasured and valued resources. I am committed to protecting the vibrant health and sustainable future of our forests... . Roadless areas in California will remain roadless."³

A Federal Court Victory

In September 2006, the new state-by-state petition process was struck down in federal court, and the 2001 roadless rule was reinstated.⁴ The case is now on appeal in the Ninth Circuit Court of Appeals with a hearing expected later this year. Wyoming also has challenged the rule in federal court and that case is currently pending. However, the Bush administration, which has joined the state in challenging the rule, has argued that the court's ruling should *not* apply outside Wyoming.

Despite the court's decision, the Bush administration continued to encourage states to pursue their own rulemakings, this time under the Administrative Procedures Act (APA). However, only the governors of Idaho and Colorado chose to submit petitions to alter protections provided by the reinstated 2001 rule.⁵

Eleventh Hour Attempt to Undo Protections

In its final days, the Bush administration is acting on the Idaho and Colorado petitions through a regulatory process that would replace the roadless rule in these states with policies that remove current protections. In both cases, it is attempting to complete the rulemakings before a new president assumes office.



In Idaho, the administration is putting the finishing touches on a rule for national forest roadless areas that would allow for new phosphate mining, road-building and commercial logging in the state's backcountry. It is taking this action despite the enthusiastic support of the majority of the state's voters, including hunters and anglers, to prohibit industrial development in these pristine areas.⁶

The administration has taken a similar approach in Colorado by proposing to repeal the 2001 rule to allow development of roughly 100 new oil and gas leases in national forests currently off limits to drilling. It is expected to issue its proposed rule and Draft Environmental Impact Statement in July 2008, despite a directive by White House Chief of Staff Joshua Bolten ordering a moratorium on new regulations after June 1, 2008, and to complete any ongoing rulemakings by November 1, "except in extraordinary

circumstances."⁷ For Colorado and its unmatched outdoor environment, the aftermath of this hasty rulemaking could have irreparable consequences.

Colorado and the Roadless Rule

Colorado has about 14.5 million acres of national forests, with roughly one-third or 4.4 million acres currently protected by the 2001 roadless rule. Colorado's finest backcountry, which includes such fabled places as Grizzly Creek in the White River National Forest and Gulch and Barr Trail in the Pike National

Forest, serve as a source for clean drinking water, habitat for fish and wildlife and as prime outdoor recreation destinations for Coloradans and international visitors alike.

Under the direction of former Governor Bill Owens (R), Colorado was one of two states that decided to move forward with the lengthy petition process under the 2005 petition process. Governor Owens, an opponent of the roadless rule since its adoption, announced his decision to draft his own protections, saying, "It would be very unfortunate if we were to revert back to a rule established hastily without public input during the waning days of the Clinton administration... . We simply should not have a federal magistrate in San Francisco unilaterally dictating natural resource policy for the entire country."⁸

The Colorado legislature responded by creating the Colorado Roadless Areas Review Task Force.⁹ Based on task force recommendations, Governor Owens submitted a petition to the USDA in September 2006.

Fortunately, days later a federal district court nullified the Bush administration's state-by-state petition process and reinstated the original roadless rule.¹⁰ Two months later, Bill Ritter (D) was elected governor of Colorado. Shortly thereafter, the USDA asked him to resubmit the state's petition under the Administrative Procedures Act.

Governor Ritter responded by expressing support for the 2001 roadless rule and submitted a slightly revised petition as "an insurance policy" so that some protections would remain in place in the event that federal officials and industry prevailed in their appeal of the federal court decision.¹¹

In submitting the petition to the USDA, Governor Ritter said,

"Although I support the protections provided by the 2001 Roadless Rule, which currently protects these special lands in Colorado, I am concerned that potential future court rulings could place the 2001 Rule in jeopardy and leave Colorado's roadless areas unprotected...¹² I am therefore requesting a state-specific rule-making process to serve as Colorado's insurance policy for protection of our roadless areas..."¹³

The governor also indicated he had received assurances from Washington that it would not authorize any activities in roadless areas that were inconsistent with the 2001 rule during the new rulemaking. He also reserved the right to withdraw the petition or to withhold his signature from the Record of Decision if the rule-making outcomes were unacceptable to the state.¹⁴

Governor Ritter's support for the original roadless rule reflects public sentiment in Colorado to protect these areas. As the Colorado Division of Wildlife wrote in its official comments to the state's roadless task force:

"Colorado's Inventoried Roadless Areas should be protected, managed and maintained to provide the maximum benefit for wildlife and wildlife habitat... Maintaining the provisions of the 2001 Roadless Conservation Rule would allow us to conserve the values and characteristics of roadless areas that are critical to the Division's mission, and which provide multiple public benefits, without prohibiting such uses as grazing, mineral exploration and extraction, forest health and fire management... [R]epealing the protections currently afforded these lands could result in irreversible changes."¹⁵

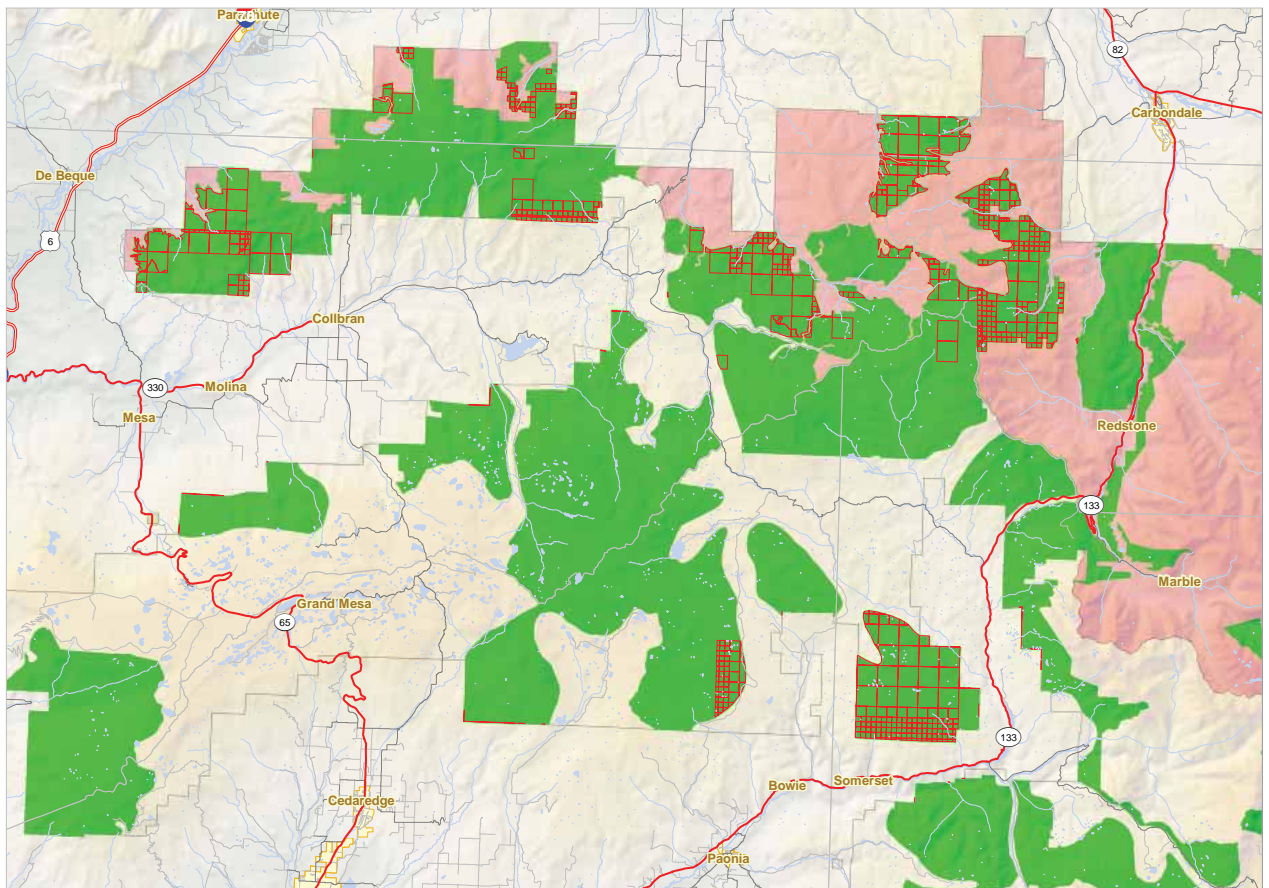
Oil and Gas Development Moves Forward

A little known loophole in the new policy would legalize roughly 100 oil and gas leases in Colorado's roadless areas issued by the current administration but enjoined by the federal district court when it reinstated the roadless rule in 2006.

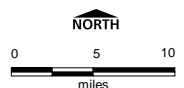
On December 26, 2007, the administration officials formally began a federal rulemaking to remove Colorado's national forests from the protections of the 2001 roadless rule and to allow commercial logging and coal mining, and oil and gas drilling in pristine areas previously off limits to development. The preliminary proposal generated more than 80,000 comments in opposition to it.¹⁶

Most significantly, however, in a little known loophole the new policy would legalize roughly 100 oil and gas leases in Colorado's roadless areas issued by the current administration but enjoined by the federal district court when it reinstated the roadless rule in 2006.¹⁷ In issuing the order reinstating the rule, the federal district court stated that the injunction applied to all leases issued after that date, writing, "The Forest Service is enjoined from approving or allowing any surface use of a mineral lease issued after January 12, 2001, that has not already commenced on the ground and which would violate the Roadless Rule. . ."¹⁸

Grande Mesa-Uncompaghre-Gunnison-Rifle Lease Intersections: 2001 to 2006



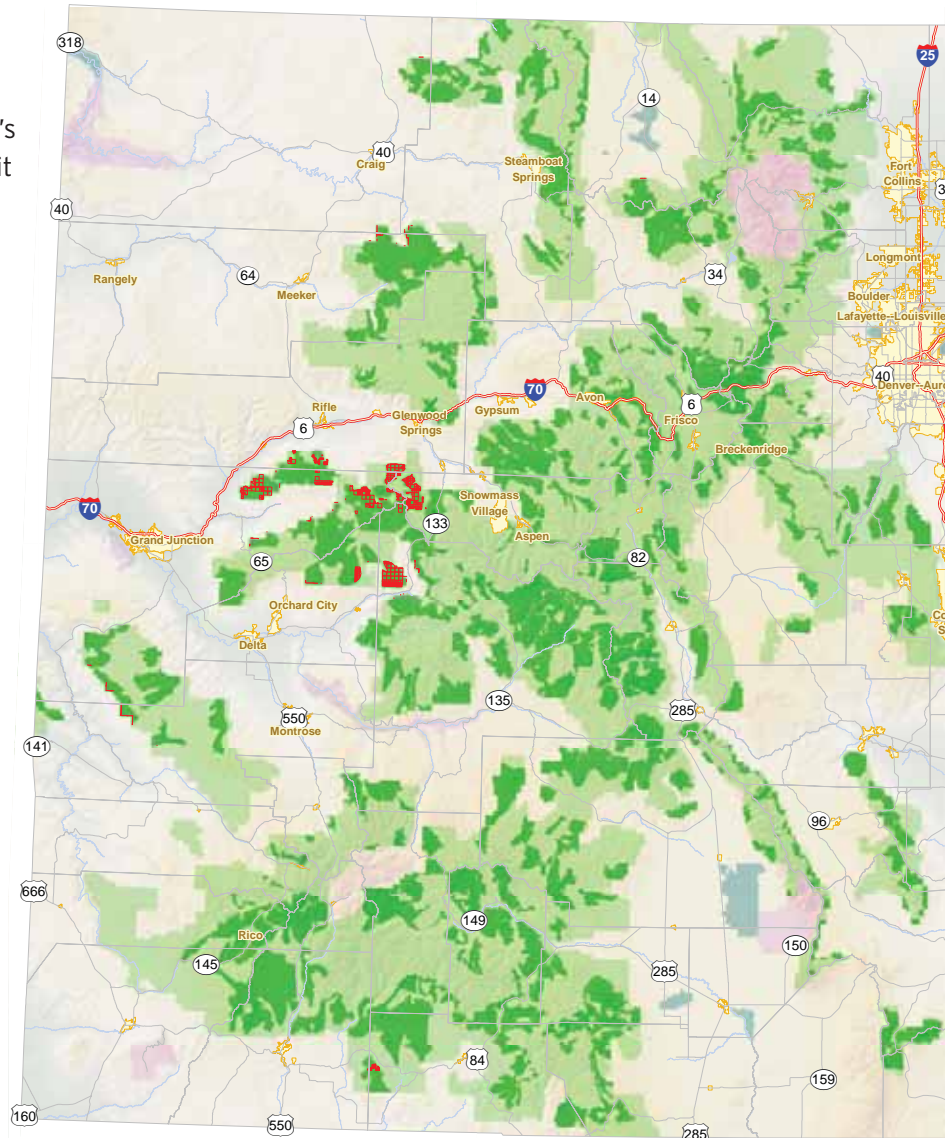
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Colorado Lease Intersections with Roadless Areas, 2001-2006

In contrast, the federal government's proposal for Colorado would prohibit road construction *only* on future oil and gas leases issued *after* the new regulation took effect though the federal rulemaking process.¹⁹

As a result, oil and gas drilling that would be illegal under the roadless rule could move forward in approximately 87,000 acres of national forests in Colorado that are currently off limits to such development.



- Legend**
- Region of Interest
 - Roadless Areas
 - Lease Intersections
 - Lakes
 - Urban Areas
 - County Borders
 - Highways
 - Major Roads
 - Local Roads
 - Streams

National Forests

- Unnamed
- Arapaho-Roosevelt
- Grand Mesa-Uncomp.
- GrandMesa
- Manti-La Sal
- Medicine Bow-Routt
- Pike-San Isabel
- Rio Grande
- San Juan
- White River

Data sources:

- National Inventoried Roadless Areas (IRAs)
The US Forest Service, USDA
Final Edited: 6/27/2003
- National Forest System Boundary Database
The US Forest Service, USDA
Published: 9/15/2000
- Oil and Gas Lease Boundaries
The US Bureau of Land Management
Updated: 3/26/2008

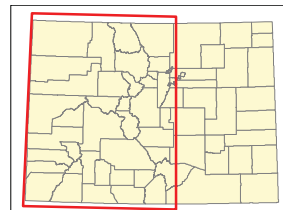
- Legend**
- Oil & Gas Lease Intersections
 - Roadless Areas
 - National Forest
 - National Parks
 - National Wildlife Refuge
 - County Boundaries

Data sources:

- National Inventoried Roadless Areas (IRAs)
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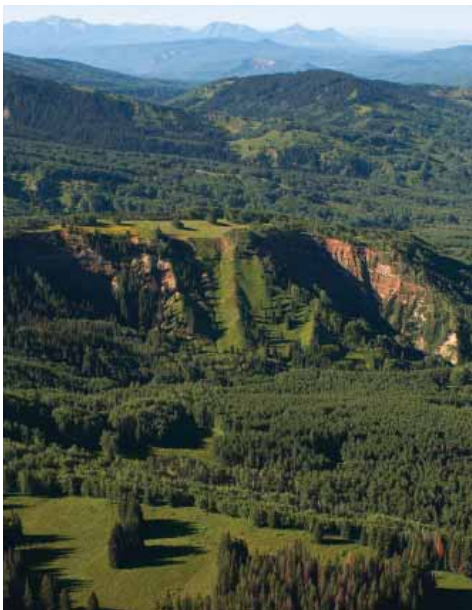
Backcountry at Risk

At stake is some of Colorado's most scenic backcountry, which for generations has served as a haven for outdoor recreation and home to valuable fish and wildlife. Colorado's roadless backcountry is home to the majority of the state's cutthroat trout population as well as providing the highest concentration of big game, according to a recent report by the non-profit sportsmen's organization, Trout Unlimited. According to a recent analysis, all three of Colorado's native cutthroat trout species depend heavily on roadless areas for habitat and survival. The group found, for example, that 76 percent of present-day greenback cutthroat trout habitat was found in those sections of coldwater, such as the Rio Grande and Colorado River, which ran through roadless areas.²⁰

Roadless areas are equally important to big game and Colorado big-game hunters, the report notes. For example, 41 percent of all land in the state that yields the highest number of trophy mule deer bucks is roadless, while the most hunted lands for the state's prized elk are roadless. Drilling and other development would result in roads, well pads and collection pipes, all of which bisect game habitat and present potential problems to fish habitat thanks to erosion and pollution.²¹

The following are three examples of the backcountry bounty that would be irrevocably lost if the roadless rule were replaced and drilling allowed to go forward under the administration's proposal.

Clear Forks Divide: Colorado's largest roadless complex



*Clear Forks Divide with West Elk (Mountain/Wilderness) in background
© JT Thomas/LightHawk*

Covering more than 94,000 acres, Clear Forks Divide, south and west of Carbondale, represents one of Colorado's largest tracts of intact backcountry. It is also considered by many to be under the greatest threat from new oil and gas leases.

Clear Forks Divide splits three watersheds, and its six sprawling forests include rugged canyons, aspen-covered rolling hills and mature spruce stands. Much of Clear Forks is within the Grand Mesa-Uncompaghe-Gunnison National Forest and White River National Forest, which, according to the Forest Service, draws more outdoor enthusiasts than any other national forest in the nation. It also serves as an important migration corridor for elk, and contains some of the state's best black bear habitat. Its rivers and streams host cutthroat trout, which in Colorado are under threat from loss of habitat and water diversion.²²

Visitors are attracted by the lure of unparalleled ice and rock climbing, spectacular hiking, prized fishing and world-class big-game hunting.

Although these areas were protected from development by the 2001 roadless rule, 45 leases have been proposed by the administration since 2001, which would allow nearly 31,000 acres—one third of this magnificent backcountry—to be developed for oil and gas drilling.

Oil and gas development here could quickly and permanently change the landscape, threatening hiking and climbing along Thompson Creek, a popular destination, providing excellent hiking, climbing and boasting great views of Mount Sopris and the Roaring Fork Valley.

Battlement Mesa: Priority wildlife habitat

Battlement Mesa, a 20-mile long ridge dividing Plateau Creek from the Colorado River, contains the Mamm Peak roadless area, including the rugged peaks of Sugarloaf and Haystack Mountains.



Summer in the Mamm Peak roadless area
© Citizens for Roadless Area Defense

Because of its varied topography and vegetation, the Mamm Peak roadless area has been identified by the Colorado Division of Wildlife as high priority habitat for mule deer, elk, bear, wild turkey, and cutthroat trout.²³

Straddling a long wildland corridor from De Beque to Thompson Creek, it serves as a seasonal transit zone and calving area for big game. Now development of private lands to the north of Battlement Mesa and natural gas development throughout the region is forcing wildlife to use this roadless area for migration, underscoring the importance of maintaining the ecological integrity of these roadless acres by protecting them from further development.

HD Mountains: An island of pristine backcountry

The HD Mountains, part of Colorado's iconic San Juan range, is a 27,000-acre roadless area near Pagosa Springs.

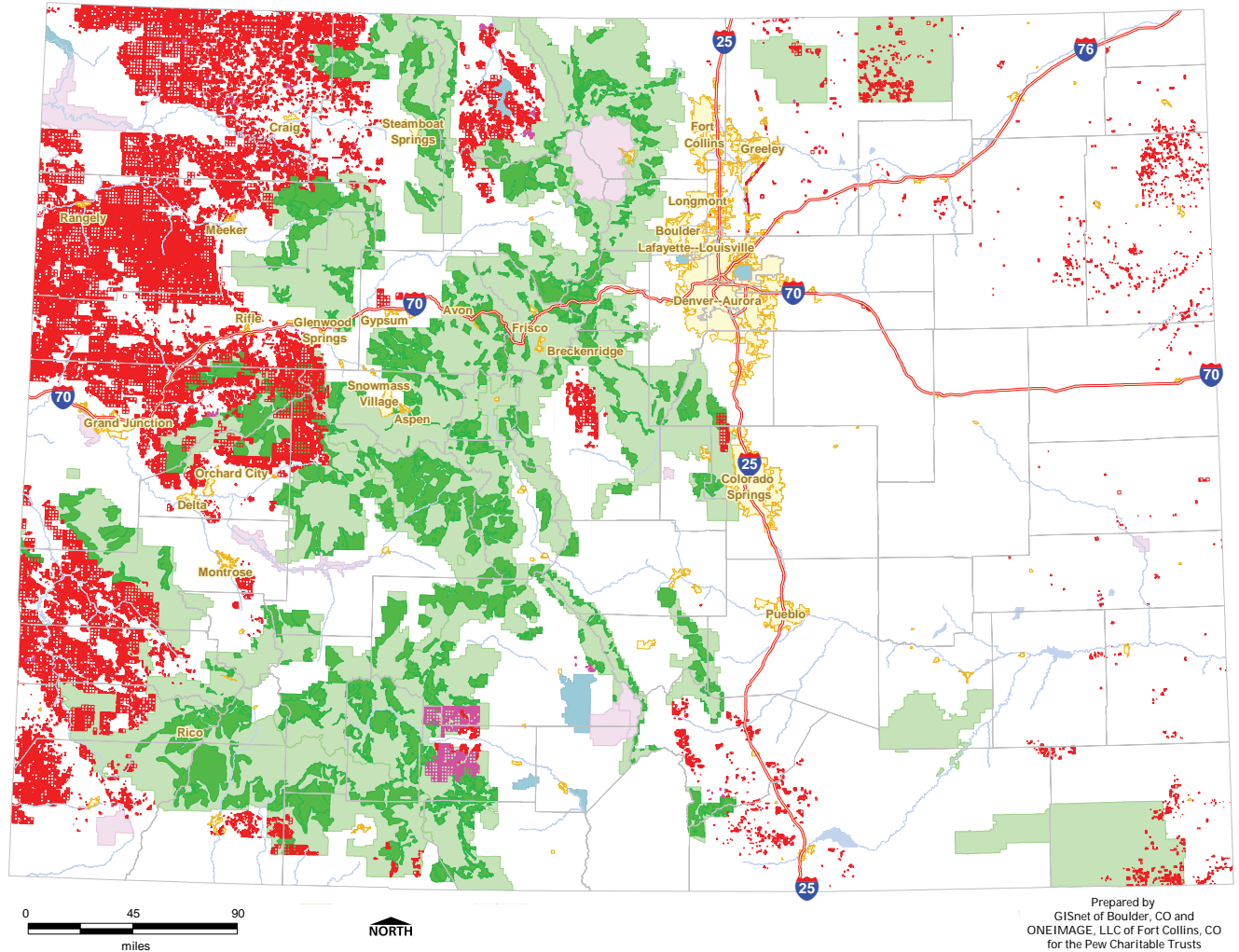
This region contains the most magnificent of the few old-growth ponderosa pine forests remaining in the state, where 250-year old trees often exceed three feet in diameter. Visitors enjoy the opportunity to horseback ride through the rugged country year round. Streams in the HDs incise deep valleys, its mountains span the big game migration corridor for elk and mule deer, and its canyons are home to hundreds of 1,000-year-old archeological sites. These prized backcountry lands were protected from development under the 2001 roadless rule.

The administration's proposal would allow development of oil and gas leases issued since the adoption of the 2001 Roadless Rule, permitting industry to drill in much of the last wild landscape of the HD Mountains.



Winter in the San Juan's HD Mountains
© San Juan Citizens Alliance

All Colorado Oil and Gas Leases & Roadless Areas



A Drop in the Bucket

Opening up this backcountry to oil and gas development comes at a time when drilling across the Rocky Mountain West has skyrocketed. Colorado, particularly its Western Slope, has been “ground zero” for energy development in the United States with a 600 percent increase in the number of new drilling permits since 1999.²⁴ Permits to develop and drill continue to be issued at a record rate, with nearly a third more approved in the first quarter of 2008 than in the same period for 2007.²⁵ Many of these new leases have been issued by the government without public comment through a process known as “categorical exclusion” that was expanded by administration officials in 2005.²⁶

The pace seems to be hastening as the administration’s tenure comes to a close. Despite strong opposition from Governor Ritter, members of Congress and other state leaders and citizen organizations, the administration recently announced it will auction off more than 55,000 acres of Colorado’s spectacular Roan Plateau in August.²⁷ Federal officials rejected the phased-in approach favored by many state lawmakers and rejected safeguards for fish and wildlife habitat advanced by hunting and angling groups.²⁸

Drilling in Colorado’s backcountry threatens watersheds, wildlife and the wilderness experience unique to landscapes where there are no roads or industrial development. And at what price?

Legend



Data sources:

National Inventoried Roadless Areas (IRAs)
USDA Forest Service,
Geospatial Service and Technology Center (GSTC)
National Inventoried Roadless Areas (IRAs)
Updated: 6/27/2003

National Forest System Boundary Database
USDA Forest Service,
Geospatial Service and Technology Center (GSTC)
Title: National Forest Boundaries
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Oil and Gas Lease Boundaries
Bureau of Land Management,
Colorado State Office Web site
www.blm.gov/co/st/en/BLM_Programs/oilandgas.html
Updated 3/26/2008

The amount of oil and gas that could be practically taken from all Colorado's national forests roadless areas represents a drop in the bucket in terms of the country's energy needs. According to a recent analysis of U.S. Geological Service data by the non-profit organization The Wilderness Society, based on current consumption rates, economically recoverable natural gas in all of Colorado's national forest roadless areas could meet total U.S. gas consumption for a total of only 10 to 17 days. Economically recoverable oil in the state's roadless areas could meet total U.S. oil consumption for less than 12 hours.²⁹

Governor Bill Ritter and other Colorado leaders have said that energy development is important to Colorado, but it must be balanced with the state's economy and with the desires of Coloradans to conserve these public lands. As the governor said in April 2008, "Everyone... has heard me say the oil and gas industry is tremendously important to our state," adding, "They were a \$23 billion industry last year, and we want to see that industry thrive. But at the same time, we believe it's important to really account for impacts."³⁰

Based on current consumption rates, economically recoverable natural gas in all of Colorado's national forest roadless areas could meet total U.S. gas consumption for a total of only 10 to 17 days.

Recommendation

The federal government's plan to develop oil and gas projects in Colorado's most pristine backcountry has not been thoroughly assessed for its impact on clean water, valuable fish and wildlife habitat and recreational opportunities. Moreover, it has not weighed the potential threat that the drilling could pose to these remarkable landscapes against the energy that could be generated from the development. Until Colorado and the nation know more, the Bush administration should not press forward.

More than two years after Governor Ritter backed a state-based petition as an "insurance policy" to protect Colorado's roadless areas, the process is moving in the opposite direction. The current federal rulemaking has become the vehicle that would allow the administration to remove critical protection for Colorado's 4.4 million acres of national backcountry forests, offering them fewer protections than almost any other state in the United States. As a result, some of Colorado's most extraordinary places would be targeted for future road-building and development.

Governor Ritter can best serve Colorado and the nation by calling on the Bush administration to suspend its new rulemaking until the full impact of the approximately 100 new oil and gas leases on water quality, valuable fish and wildlife, outdoor recreation and the state's economic future can be thoroughly assessed.

This prudent and precautionary step is essential to a balanced approach to energy development in the state. It also will ensure that Colorado's last pristine forests will be preserved for future generations.

Appendix of New Leases

New oil & gas leases in Colorado's Inventoried Roadless Areas approved for development if 2001 Roadless Area Conservation Rule is repealed

The following oil and gas leases in Colorado's Inventoried Roadless Areas (IRAs) were issued by the Bush administration between 2001 and 2006, but enjoined by a federal court when it reinstated the 2001 Roadless Area Conservation Rule. If the Bush administration's new Colorado roadless rulemaking moves forward, these leases would be approved for development. This list represents the known tally as of September 2006, but does not include additional leases that may have been issued since that date.

National Forest	Acres
Grand Mesa, Uncompahgre & Gunnison National Forests	41,627*
San Juan National Forest	1,632
White River National Forest	42,569*
Other	1,319*
Grand Total	87,147

Acres of Colorado Inventoried Roadless Area (IRA) Leases Currently Under Court Injunction, by Inventoried Roadless Area and Lease Number**

Lease No.	Acres	Lease No.	Acres	Lease No.	Acres	Lease No.	Acres	Lease No.	Acres
Battlement Crk. IRA, GMUG NF (164 Acres)		69381	187	HD Mts. IRA., SJNF (1,632 Acres)		Priest Mt. IRA, GMUG NF (2,711 Acres)		68788	574
66734	164	69999	1,120	64935	1,270	65535	800	68789	911
		70000	2,558	64936	362	65536	260	68790	703
		70001	219	Hightower & Reno Mt. IRAs, WRNF (771 Acres)		65537	226	68791	43
		70010	403	70011	771	65538	1,425	Thompson Crk. IRA, WRNF (13,663 Acres)	
Battlement Mesa IRA, GMUG NF (12,322 Acres)		Clear Crk. & Drift Crk., GMUG NF (903 Acres)		Housetop Mt. & Battlement Crk. IRAs, GMUG NF (309 Acres)		Ragged Mountains IRA, GMUG NF (2,138 Acres)		66691	48
68800	1,687	70002	903	66926	309	69998	2,138	66692	1,348
68801	1,126	Drift Crk. IRA, GMUG NF (449 Acres)		Mamm Peak & Battlement Mesa IRAs, WRNF (307 Acres)		Reno Mt. & E. Willow IRAs, WR & GMUG NF (1,319 Acres)		66694	116
68802	535	70006	449	66919	307	Reno Mt. IRA, WRNF (7,343 Acres)		66695	474
68804	1,603	E. Divide & Four Mile IRAs, WRNF (8,653 Acres)		Mamm Peak IRA, GMUG NF (50 Acres)		66724	1,209	66696	912
68805	1,280	66707	1,169	70016	50	66732	1,163	66697	1,138
68806	647	66708	1,331	Mamm Peak IRA, WRNF (2,663 Acres)		66915	1,920	66698	1,047
70012	1,215	66709	170	67147	790	66916	2,560	66699	82
70013	1,228	66710	1,912	67150	587	67541	491	66700	753
70014	1,488	66711	183	67543	1,038	Springhouse Crk. IRA, GMUG NF (16,400 Acres)		66701	1,843
70015	1,513	66712	464	67544	248	65114	333	66702	484
Battlement Mesa IRA, WRNF (6,121 Acres)		66713	1,283	Moraposa IRA, WRNF (751 Acres)		65523	2,560	66706	1,970
66727	640	66714	1,283	66760	751	65524	2,560	66908	1,200
66728	838	66715	640			65525	795	66909	833
66729	498	66716	976			65526	1,920	66910	663
66730	1,226	66717	525			65527	1,280	67538	269
66733	788	E. Willow & Baldy Mt. IRAs, WRNF (1,025 Acres)				65528	1,026	67540	483
66734	1,280	66913	920	East Willow IRA, WRNF (72 Acres)		65529	2,030	Other GMUG IRA, GMUG NF (1,280 Acres)	
66926	851	66966	105	66723	72	65530	1,665	66701	1,843
Campbell Point IRA, GMUG NF (312 Acres)		E. Willow & Baldy Mt. IRAs, WRNF (1,025 Acres)						66702	484
70103	312	E. Willow & Baldy Mt. IRAs, WRNF (1,025 Acres)						66706	1,970
		66913	920					66908	1,200
Clear Creek IRA, GMUG NF (4,589 Acres)		66966	105					66909	833
66700	13	East Willow IRA, WRNF (72 Acres)						66910	663
66702	89	66723	72					67538	269
								67540	483
								Other WRNF IRA, WRNF (1,200 Acres)	
								65014	1,280
								Other WRNF IRA, WRNF (1,200 Acres)	
								48779	240
								66731	640
								67725	320
								GRAND TOTAL: 87,147 ACRES	

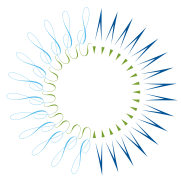
* Note: The Forest Service's court documents describe lease 66917 as containing 1,319 acres within the Reno Mt. and E. Willow IRAs on the White Mountain and GMUG National Forests, but does not detail how many acres are in each. This lease is therefore listed as "Other."

** http://ourforests.org/pdf/06-11-01_doc214_declaration_of_tracy_parker.pdf
http://ourforests.org/pdf/06-11-01_doc%20214_exhibit_A.pdf

Endnotes

- 1 <http://roadless.fs.fed.us/states/co/state3.shtml>
- 2 Letter from the Democratic Governors Association to Secretary of Agriculture Ann Veneman, November 12, 2004. (<http://www.wilderness.org/Library/Documents/upload/GovsRoadlessLetter.pdf>)
- 3 Gov. Schwarzenegger Press Release; 07/12/2006; <http://gov.ca.gov/index.php?/press-release/1605/>
- 4 Tongass exclusion from roadless rule, HFC Press Release, <http://ourforests.org/press/pr22803.html>
- 5 http://www.ourforests.org/documents/roadless_rule_decision.pdf
- 6 Idaho Statesman, 02/02/08, <http://www.idahostatesman.com/opinion/story/282903.html>; the actual poll can be found at: <http://www.ourforests.org/pdf/summary-idaho-voters.pdf>
- 7 Memorandum from White House Chief of Staff Josh Bolton; <http://www.ombwatch.org/regs/PDFs/BoltenMemo050908.pdf>
- 8 Associated Press, "Federal judge overturns Bush plan that eased road-building limits in national forests," September 21, 2006.
- 9 A 13 member stakeholder body presented its report to Governor Owens on August 9, 2006. - Senate Bill 243 http://www.state.co.us/gov_dir/leg_dir/olls/sl2005a/sl_318.htm
- 10 Federal District Court Decision; http://www.ourforests.org/documents/roadless_rule_decision.pdf
- 11 Gov. Ritter's letter to Undersecretary Mark Rey, April 11, 2007; http://www.fs.fed.us/emc/roadless/041107ritter_to_rey_letter.pdf
- 12 Ibid. Gov. Ritter's letter to Undersecretary Mark Rey, April 11, 2007
- 13 News Release, Gov. Bill Ritter, Jr., April 11, 2007 <http://www.colorado.gov/cs/Satellite?c=Page&cid=1190018724921&pagename=GovRitter%2FGOVRLLayout>
- 14 Gov. Ritter's letter to Undersecretary Mark Rey, April 11, 2007
- 15 Colorado Division of Wildlife Executive Summary of the Analysis of the Public Comments Submitted to the Roadless Areas Review Task Force July 18, 2006 Prepared by Mondo Business Group, Ltd., Page i) <http://www.roadless.net/sections/support/exec%20summary%20of%20final%20report.pdf>
- 16 HFC Website - press release; <http://www.ourforests.org/press/pr08-02-27.html>
- 17 The Roadless Rule prohibits road construction on leases issued after January 12, 2001; http://roadless.fs.fed.us/documents/rule/roadless_fedreg_rule.pdf
 - § 294.12 Prohibition on road construction and road reconstruction in inventoried roadless areas.
 - (a) A road may not be constructed or reconstructed in inventoried roadless areas of the National Forest System, except as provided in paragraph (b) of this section.
 - (b) Notwithstanding the prohibition in paragraph (a) of this section, a road may be constructed or reconstructed in an inventoried roadless area if the Responsible Official determines that one of the following circumstances exists:
 - (7) A road is needed in conjunction with the continuation, extension, or renewal of a mineral lease on lands that are under lease by the Secretary of the Interior as of January 12, 2001 or for a new lease issued immediately upon expiration of an existing lease. Such road construction or reconstruction must be conducted in a manner that minimizes effects on surface resources, prevents unnecessary or unreasonable surface disturbance, and complies with all applicable lease requirements, land and resource management plan direction, regulations, and laws. Roads constructed or reconstructed pursuant to this paragraph must be obliterated when no longer needed for the purposes of the lease or upon termination or expiration of the lease, whichever is sooner. 66 Fed. Reg. 3244, 3272-73 (January 12, 2001).
- 18 Order Granting Injunctive Relief in *People of the State of California v. USDA and The Wilderness Society v. USFS*, No. C05-03508 EDL consolidated, slip op. at 13 (N. D. Cal. November 29, 2006)
- 19 Nothing in this Rule shall affect the availability of inventoried roadless areas for future oil & gas leasing, except that for any leases issued after the date of implementation of this Rule, no new roads for oil & gas exploration, development, or transportation may be constructed in inventoried roadless areas. (Colorado petition, page 12; http://www.fs.fed.us/emc/roadless/co_roadless_petition_111306.pdf)

Further, the 2007 Petition provided that no new roads would be constructed in Colorado Roadless Areas for exploration, development or transportation purposes relating to oil and gas leases issued after the date of implementation of the Rule. (*Notice of Intent*, Federal Register / Vol. 72, No. 246 / Wednesday, December 26, 2007, page 72984, http://roadless.fs.fed.us/documents/colorado_roadless/CO_noi_071226.pdf)
- 20 "Where the Wild Lands Are: Colorado" Trout Unlimited 2006) http://www.tu.org/atf/ct/%7BED0023C4-EA23-4396-9371-8509DC5B4953%7D/Roadless_CO_final.pdf
- 21 *ibid.*
- 22 http://www.tu.org/atf/ct/%7BED0023C4-EA23-4396-9371-8509DC5B4953%7D/Roadless_CO_final.pdf
- 23 www.roadless.org/p-mamm-peak-164.html
- 24 Rocky Mountain News, "Drilling permits hit record 6,368," January 3, 2008.
- 25 "The number of drilling permits approved in the first quarter of this year rose by 33% from the same period last year. If the pace continues, Neslin said the state could issue as many as 8,000 permits this year" (Dave Neslin, acting director of the state Oil and Gas Conservation Commission); *The Los Angeles Times*, April 1, 2008, <http://articles.latimes.com/2008/apr/01/nation/na-colorado1> or *The Los Angeles Times*, April 1, 2008 <http://articles.latimes.com/2008/apr/01/nation/na-colorado1>
- 26 *Summit Daily News*, Energy development: 'It's David vs. Godzilla', Bob Berwyn, May 17, 2008
- 27 [www.blm.gov/co/st/en/BLM Information/newsroom/208/blm announces august.html](http://www.blm.gov/co/st/en/BLM%20Information/newsroom/208/blm%20announces%20august.html)
- 28 [www.gjsentinel.com/hp/content/news/stories/2008/06/09/0610081a roan sale.html](http://www.gjsentinel.com/hp/content/news/stories/2008/06/09/0610081a%20roan%20sale.html)
- 29 Too Wild to Drill, The Wilderness Society, October 2006, <http://www.tws.org>
- 30 *The Rocky Mountain News*, "Ritter, energy industry part on regulatory path Governor claims he's after balance; GOP critics cringe," Chris Barge, *Rocky Mountain News*, 7 April 2008



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