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Board of County Commissioners of Pitkin
County, Colorado

Brian Glaspell, Forest Supervisor
White River National Forest

Re: Proposed Special Use Permit from the USDA Forest Service to Manage the Maroon Bells Scenic Area

Dear Pitkin County Commissioners and Forest Supervisor Gaspell:

I write to voice my deep concern about the proposal to issue a special use permit to Pitkin County to manage the Maroon Bells Scenic Area. I took a backpack trip into the Maroon Bells many years ago, and I remember that experience fondly, and still marvel at the outstanding scenery and recreational experience that the Maroon Bells offers. Although I have not been back to that area for many years, I have hiked and camped and backpacked through many national forests around the country. These days, I spend a great deal of time recreating in and around the Arapaho Roosevelt National Forest, because it is adjacent to my property in Allenspark, Colorado.

My experience with national forests has been mixed. When I lived in Laramie, Wyoming I became frustrated by and fought against many money-losing timber sales in the Medicine Bow National Forest that seemed ill-advised, and incompatible with good forest management. I was also unhappy with agency's poor management of some grazing permits, especially in situations where livestock were damaging streams and other sensitive areas. On the other hand, I have great respect for and have had a good working relationship with some of the forest managers, and over the years I have been able to work with like-minded colleagues to persuade the Forest Service to block some of the worst proposals that they were considering. My experience, however, taught me that affording the public a fair opportunity to work with professionals at the Forest Service offers the best path toward better management of forest resources.

A growing concern of mine has been the trend toward turning more and more management responsibilities over to third parties. Many of the concession contracts that the Forest Service awards seem primarily designed to generate revenue for private parties. But that comes at the cost of removing the Forest Service from its management responsibilities and it removes the public from interaction with forest rangers and other forest service personnel. For what it's worth, the Park Service seems much more

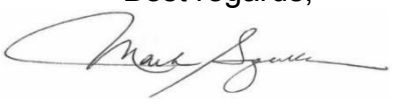
committed to interfacing with the public in a meaningful way. Most people greatly appreciate the opportunity for meaningful interactions with our public land managers, and we often don't get that with the Forest Service, especially not in the field. Frankly, I see concessions as a big part of the problem. Concessionaires often lack the experience and expertise needed to educate and inform the public about our public land resources.

I say this while recognizing that Pitkin County certainly has good intentions as it considers whether to pursue the opportunity to assume responsibility for managing the Maroon Bells Scenic Area. Additionally, the County's long-running partnership supporting the White River National Forest in managing the Maroon Bells Scenic Area sets it apart from other concessionaires. But a concession for Pitkin County is a slippery slope that could lead the Forest Service to pursue agreements like this in many other national forests with public and private parties that may not have the resources or commitment that Pitkin County brings to the table. So, this is not meant as a criticism of Pitkin County; rather, it is a criticism of a federal agency that seems more and more inclined to pawn off its responsibilities to third parties in ways that deny the public a fair opportunity to interact with our federal land managers in settings where we truly crave that interaction.

Let me end by pointing out the obvious legal problem with this proposal. The Forest Service seems to think that they can approve this Special Use Permit without preparing any environmental analysis. Given the national importance of the Maroon Bells Scenic Area, I believe that this proposed action requires, at minimum, an Environmental Assessment and perhaps a full-scale EIS. But the idea that the Forest Service can lawfully categorically exclude this proposal is laughable. Frankly, the Forest Service has expanded categorical exclusions far beyond where I think they can legally go, but this proposed permit does not even meet the broad text of USDA-29c-USFS, which the Forest Service apparently thinks it can use in this case. That provision does not allow the wholesale transfer of management responsibility over the entire Maroon Bells Scenic Area as is apparently being proposed here. If Pitkin County has any inclination to go along with this proposal, it should insist, at a minimum, that the Forest Service prepare a detailed environmental analysis with a full discussion of reasonable alternatives, and with robust opportunities for public engagement.

Thank you for the opportunity to share these comments. I hope that you will give them serious consideration before you take any action that could compromise the public's relationship with this outstanding recreational resource.

Best regards,



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