

Chapter 7 Social and Economic Considerations

This chapter addresses social and economic concerns. Social concerns are covered in Section 7.1, economic concerns in Section 7.2. Many people write about the economic aspects and social aspects as part of the same concern, or speak mainly of one but allude to the other. Because social and economic values are so intertwined, they are difficult to separate into distinct categories. For that reason many of the concern statements in the social section also reference economic issues, while many in the economic section reference social issues.

7.1 Social Effects

This section addresses public concerns about the social effects of the proposed rule. Section 7.1.1 covers concerns regarding the social value of non-commodity resources; Section 7.1.2 addresses community and family values and social justice; Section 7.1.3 presents concerns about aesthetic and scenic values; and Section 7.1.4 addresses concerns over our country's bequest to future generations.

7.1.1 Social Value of Non-Commodity Resources

Concerns about the social impacts of the proposed rule, relative to the value of non-commodity resources, appear to stem from differing views about what constitutes the primary values of public lands. To some people the presence of roads tends to degrade important non-commodity values of public lands, while to others roads enhance those values. Many people believe roadless areas should be preserved for the non-commodity values they provide. For many constituents, these values are intrinsic; respondents claim that just knowing these areas are preserved gives them peace of mind. But others point to the benefits these areas provide to the human community. According to one respondent, for example, "...a tree that lives 50 years will contribute services worth \$196,250 within its life span. These services include humidity control, air pollution control, oxygen, wildlife habitat, and soil and water protection. Add recreation on to this and a tree is certainly worth more standing than cut."

Many proponents of the proposed rule point out that roadless areas are often used as places to which they can escape from the urban environment. Roadless area values include solitude, quiet, and peacefulness. One individual comments, "I hunt both mule deer and antelope on the North Dakota grasslands every year and really enjoy getting away from the city for several days." Several respondents assert roadless areas contain the spiritual qualities they seek. "They are significant for Native Americans and others to have quiet space to rejuvenate and communicate with God," states one individual. Many citizens believe as well that the proposed rule should protect traditional recreational values, while others argue that roadless areas are beneficial as educational environs and places for research and scientific study. One citizen writes, "Wilderness and wildlands such as roadless areas provide a natural laboratory for many high school and college courses. Wilderness is also used by various organizations to help teenagers

and adults develop self-reliance, teamwork, and coping skills that can be transferred to everyday life.”

Other respondents, however, question the need for the proposed rule to protect non-commodity values. According to one writer, roads are needed for seeking solitude because the majority of people are not willing to walk to find it. Claims another, the value of roadless areas as a “spiritual and psychological resource” for nature worshippers does not warrant the dedication of 60 million acres. Some comment as well that these areas should not be protected for their use for research and education because there are other places better suited to that purpose. Finally, one individual would like to know “how much acreage is needed to achieve that ‘good feeling’ of knowing that there are roadless areas?” The Forest Service claims this “good feeling” is one of the potential benefits of roadless areas.

Public Concern: The Forest Service should preserve roadless areas for the non-commodity values they provide.

The intrinsic value of these forests supercedes any economic value to be had by mining, logging, etc. By sacrificing the pristine forest ecosystem for immediate returns, we disregard the long term benefits of protecting these beautiful wilderness areas. Not only do they provide aesthetic and recreational value, but also a life support system that we and the rest of the world depend on. (Individual, Raleigh, NC - #3904.90200)

Roads only open up areas to those who look to exploit, not experience what is natural. Roads make accessibility more convenient. Convenience will be our society’s demise. (Individual, No Address - #1437.90200)

I would rather seek asylum in the grasslands, if I could. I treasure the prairies for their dazzling light, meadowlark songs, and promise of a vast peace. Unfortunately, that peace is just a dream, because the grasslands have been utterly sectioned with roads. Now, all we have left are the few roadless forests. Will you prevent their last peace from becoming utterly sectioned by roads too? (Individual, No Address - #6307.90200)

It seems like every nature philosopher talks about the wildlands, the woods, and such in terms of their value as places of quiet, solitude, rejuvenation. This and even the ‘smell’ of the wildlands are among the intangibles banished when roads allow the easy presence of motorized noise and dust and fumes. (Individual, Meeteese, WY - #523.90220)

It has become clear that our national forests are more beneficial to humans and wildlife if left as much as possible to a state of natural maturation. Humans will be healthier and happier if forests are left roadless, free from logging and motorized vehicles. Wilderness can provide respite from people’s stressful hectic lives by providing peaceful activities like hiking, swimming, hunting, fishing, bird-watching, cross-country skiing or just observing nature. (Environmental/Preservation Organization, Osage, MN - #1037.92000)

Roadless areas provide economic benefit to the communities surrounding them. Logging and resource extraction have a place in the forest, but they are no longer the mainstay of rural economies. Recreation, hunting and fishing on our National Forests contribute at least \$111 billion to the gross domestic product and generates 2.9 million jobs each year. A study from CDF (California Department of Forestry) estimates that a tree that lives 50 years will contribute services worth \$196,250 within its life span. These services include humidity control, air pollution control, oxygen, wildlife habitat, and soil and water protection. Add recreation on to this and a tree is certainly worth more standing than cut. (Individual, Cohasset, CA - #8530.93700)

FOR ESCAPE FROM THE URBAN ENVIRONMENT

As civilization becomes more technology-based, the experience of solitude and relationship with the natural world has become more critical for many. (Individual, North Easton, MA - #174.90220)

Something that is rare these days is quiet; we need areas where no engines, vehicles, 4-wheelers, aircraft, chain saws are allowed. (Individual, Virginia, MT - #774.90220)

We live in Methow Valley, Okanogan County Washington State. A large part of the wilderness experience is getting away from urban sounds. To allow roaring, polluting snowmobiles & dirt bikes on our forest hiking trails and through our meadows is a travesty. (Individual, Winthrop, WA - #16511.90220)

As the U.S. population increases at an enormous rate, more wild areas need to be set aside as places where we can go to escape the stress of urban and suburban life. (Individual, No Address - #1952.90220)

I understand that more roads in wilderness areas are thought to placate those wishing to ride motorized vehicles. But are there not enough roads already crisscrossing the nation from amongst they can choose? Further, the noise and speed and pollution of off-road vehicles is incompatible with the reasons that many hikers, backpackers, campers, nature enthusiasts, explorers, scientists, students seek the quiet and fresh air so necessary for the revitalization of the senses following the assaults and pressures of a developed society. (Individual, Belding, MI - #2886.90220)

I appreciate the efforts of the Forest Service on behalf of our forests and grasslands. I hunt both mule deer and antelope on the ND grasslands every year and really enjoy getting away from the city for several days. (Individual, Bismarck, ND - #29813.90220)

FOR SPIRITUAL RENEWAL

They are significant for Native Americans and others to have quiet space to rejuvenate and communicate with God. (Individual, Great Falls, MT - #6444.92100)

In a recent conference held in New Hampshire, sponsored by Senator Smith and EPW, Senator Smith quoted a Senate chaplain saying, "Our lives are God's gift to us. What we do with them is our gift to him." Senator Smith added "I can think of no greater gift to God than to take care of his creation and all that abide in it." (Individual, Goffstown, NH - #6621.92100)

I am here because this is a spiritual issue for me. Ancient wild forests represent a life energy to me, that is beyond our experience and perhaps, will always be beyond our ability to fully understand. (Individual, Burnsville, MN - #8105.92100)

It would be unconscionable and beyond the pale of decency for the Forest Service to adopt a "roadless" policy that enables any degradation whatsoever of the last remaining pristine roadless tracts in the Black Hills National Forest. In deference to their spiritual significance to tribal people who retain an outstanding legal claim on them, these places must have the highest degree of protection from any degradation of their pristine character. (Civic Organization, No Address - #52418.92100)

I urge you to make the proposed regulations in a manner that respects those who find renewal in being there as a part of nature, not for reasons of profit. (Individual, Cambridge, MA - #834.90200)

This materialistic orientation to life, which exploits the American earth and presumes that the production and consumption of products is the highest good, is the altar upon which corporate America, Madison Avenue and the U.S. Forest Service worship--and they would have us all do the same. But people are, above all, spiritual beings, whose pursuit of happiness and spiritual sustenance is intimately linked to the world of nature.

And so today, the great virgin forests of Idaho and the nation stand as a defiant symbol of the right of all Americans to experience and enjoy those values that derive from untrammelled nature, and which give to life one of its richest, most beautiful dimensions. (Individual, Osburn, ID - #44100.92300)

I want to talk about our psychological and spiritual need for wilderness. Everyone needs wilderness, whether they know it or not. Many people never get out in wild places as I have, BUT WE ALL NEED TO KNOW THAT WILD, ROADLESS PLACES EXIST! Just KNOWING there are wild places in the world - even if just to DAYDREAM about them - is an essential part of the human experience. (Individual, Sitka, AK - #25902.92100)

FOR RECREATIONAL OPPORTUNITIES

I have spent 36 years hiking, climbing, fishing, and hunting in the Naches Ranger District. In that time I have seen several of my favorite backcountry areas invaded by roads, and overall quality of the area degraded. Wildlife numbers decline. Hunting and fishing opportunities have eroded. Peace, quiet, and solitude have been shattered by passenger vehicles. (Individual, Yakima, WA - #2760.90000)

There are many of us who value our natural resources as a source of recreation and an important aspect of our tourism industry, and want to do everything we can to protect our roadless areas. (Individual, Coeur d'Alene, ID - #934.91000)

The revised forest plans should emphasize locally important sociological and economic values which include preserving and enhancing traditionally established types of recreation activity. These activities include the use of saddle and pack stock, hunting, fishing, and hiking. (Business/Business Association, Lander, WY - #4567.91000)

FOR SCIENTIFIC STUDY

I feel very strongly that we ought to protect our last remaining wild forests as places for recreation and scientific study, not for continued road-building and logging at the taxpayer expense. (Individual, Covington, LA - #1374.83000)

These two forests in my home state of Utah provide incredible opportunities for public recreation, university research, and individual enjoyment. (Individual, Logan, UT - #4543.91000)

Roadless areas are important for escaping our modern-day hectic society, if only for a short time. But roadless areas also serve useful baselines for research. (Individual, Anchorage, AK - #12927.90200)

FOR THEIR EDUCATIONAL VALUE

Educational Values: Wilderness and wildlands such as roadless areas provide a natural laboratory for many high school and college courses. Wilderness is also used by various organizations to help teenagers and adults develop self-reliance, teamwork, and coping skills that can be transferred to everyday life. Some outdoor education programs focus on the development of leadership, navigational, and survival skills; others offer service-based experiences such as trail construction or cleanup. The value to society from such educational programs includes the direct benefits of improvement resulting from service trips and the indirect benefits of enhanced physical, emotional, and intellectual development as they contribute to overall social well being. (Individual, Dickinson, ND - #16095.80000)

The actions of the present will directly affect how much true wilderness will be available to the next generations. We must leave a legacy of healthy ecosystems that can be studied by advanced technology not available today. To do anything less is stealing from the future. (Individual, Mount Hood, OR - #5772.92300)

A clear deficiency in the benefit analysis is missing the benefits of roadless areas to education. As these areas were unvalued in the statement of characteristics, it is not surprising but disappointing that the value of these areas to education (as clearly distinct from recreation) is not taken into account here. We trust that educational benefits of roadless areas will be evaluated in the Final Rule and the Final Environmental Impact Statement ("FEIS"). (University/Professional Society, Lander, WY - #43733.93100)

Public Concern: The Forest Service should consider that there are few people who really want solitude or are willing to walk to find it.

Another comment was that this closure was needed so people would have someplace to go for solitude. Go for solitude? How are they going to get there when you remove 77% of Forest Service roads? The existing Wilderness is already one of the least used places in our country! If one wants solitude they can easily find it by WALKING into one of these vast unused Wildernesses! There are few people who really want solitude. Thinking back to past years when I was able to hike vast distances, which I frequently did, I can not recall of ever seeing a lone hiker, other than myself. So where are all these solitude seekers? (Individual, Melba, ID - #13027.90220)

Public Concern: The Forest Service should not dedicate 60 million roadless acres as a "spiritual and psychological resource" for nature worshippers.

We also find on page 3-164 of the DEIS that a justification for this action is that some folks view roadless areas as a "spiritual and psychological resource." Apparently several million acres of wilderness are not enough to meet the religious requirements of these nature worshippers, so we must dedicate another 60 million acres to meet their needs. This is used as justification in a nation that bans prayer in the schools and religious materials in public places. (Individual, Salt Lake City, UT - #13258.92100)

The DEIS indicates a justification for the Roadless Area Conservation proposal is that some people view roadless areas as a "spiritual and psychological resource." Although this "value" is important it must be evaluated in the context as to what degree the full achievement of this value comes at a price of excluding all others for a select few. It is inconceivable that 35 million acres of congressionally designated wilderness are not sufficient to satisfy the religious requirements of such a small group, so with little forethought we move forward to designate another 60 million acres to meet their needs. This is unbelievable in a nation that bans prayer in schools and religious materials in public places. (Individual, Sandy, UT - #25912.92100)

Public Concern: Roadless Areas should not be protected as reference areas for research and teaching as Research Natural Areas are better for that purpose.

The DEIS references one of the positive benefits of roadless areas as "reference areas for research." The Forest Service already has an active and adequate program of identifying Research Natural Areas, usually 300-1000 acres, for just that purpose. We commented on this in our response for the NOI. It would seem that our comments have been ignored in the preparation of the DEIS? We've not seen any answers to our concerns and factual comments. (County Elected Officials, Parowan, UT - #28911.90200)

SCIENTIFIC RESEARCH AND TEACHING. The need to set aside remote wilderness areas as classrooms for students and scientists seems a plausible reason to designate wilderness areas . . . until one attempts to actually use such a place for a classroom. Remoteness, severely limited access, prohibitions on the use of motor vehicles and vegetative treatments, as well as the need to protect the solitude of recreationists, all work to severely limit the value of the NWPS for research and teaching. Experimental forests and natural areas designated for research provide far better environs for most teaching and research. (Individual, Reno, NV - #17862.90200)

Public Concern: The Forest Service should explain how much acreage is needed to achieve the "good feeling" of knowing that there are roadless areas.

The Forest Service should address the claimed potential benefits of the proposed rule by answering the following questions:

How much acreage is needed to achieve that "good feeling" of knowing that there are roadless areas? (Individual, Kingsport, TN - #8500.90200)

7.1.2 Community and Family Values and Social Justice

Many people speak of the importance of public lands and roadless areas as providing the very foundation for their way of life. For some this means traditional family uses, while for others it means the lifestyle of forest dependent communities. Many respondents feel the proposed rule infringes on historic usage and cultural practices. Asserts one individual, “[The proposed rule] ignores the historic usage by our citizens for hunting, for fishing, and for other recreational activities.”

One respondent suggests the Forest Service allow for the successful implementation of the Pelican Butte Ski project because it will have a positive financial impact on the Klamath Tribe’s economic self-sufficiency plan. Many others speak of the social and cultural importance of subsistence hunting and fishing, and how the presence of roads might help or hinder that use. A number of respondents believe protection of roadless areas will protect fisheries and wildlife populations, one environmental organization noting that “reductions in wildlife and fish populations threaten the foundation of Native culture and the classic Alaskan tradition of living off the land.” Conversely, others state that restricting road access will hinder subsistence hunting and fishing.

Many respondents feel the proposed rule is a direct threat to families and family recreation. According to one writer, “We use this as our chosen form of recreation to help keep our family strong and together. This roadless policy is attacking my family’s ability to access nature and God’s intention to build good families. I consider this an attack on my family and will never cease opposing this effort.” Another respondent complains that “past government policies in this region of the United States have shut down job-creating industries and businesses making it impossible for the children of veterans’ families to find employment locally.” According to this writer, the proposed rule would only aggravate that problem. Finally, one individual comments that the agency’s analysis on employment demographics by race may be counterproductive and divisive.

Public Concern: The Forest Service should not allow this proposal to infringe upon historic, traditional, and cultural uses.

We go to the mountains year round for various outdoor sports. We often find ourselves on dirt roads in our jeep, or hiking, or riding. When I was a child my father took me camping in the same manner. It upsets me to read that this family tradition for me and for millions of others is threatened by road closure. (Individual, No Address - #6882.91700)

Some people in our little town that has clean air, little crime, and people that know their next door neighbors and leave their doors unlocked, are hearing the death toll of our way of life. The life of logging. Loggers that know about managed logging and know to do it right so there will be jobs for their sons and daughters in this generation and for generations to come. Heavy equipment loggers, that know how to build safe roads that will not harm the environment. Heck, little kids here start building roads with their Tonka trucks, when they are three years of age. Amazing roads that imitate the way their fathers build them. Let us be monitored and fined if it is not done with proper care.

Just do not take away our way of life. Bring President Clinton and whoever it is that is determined to pass this resolution up here. I’ll see they are protected and I’ll see they get a tour of the way we log from the air. I’ll take them downtown and share a beer and listen to the loggers tell of how they care for our forests. How important it is

not only to their way of life, but to our country and all the states that have more than 2/3 of their state owned by the Federal Government. (Individual, Saint Maries, ID - #5509.93700)

The cultural values of a large portion of Idaho residents, as well as a large group of non-residents are represented and supported by strong and healthy elk herds. (Environmental/Preservation Organization, Moscow, ID - #13043.90230)

Unscientific data is being used by eliminating human beings from environmental studies. We use the forest and so have many ancient civilizations before us. By removing roads from current inventories and proposing more roadless areas what effect will it have on our traditional practices of gathering vigas, latilias, firewood, and grazing livestock? (Individual, Santa Fe, NM - #9442.92000)

It ignores the historic usage by our citizens for hunting, for fishing, and for other recreational activities. It ignores population trends. It ignores timber requirements to house this population. (Individual, No Address - #23573.90010)

Public Concern: The proposed rule should allow the Pelican Butte Ski project to continue for the positive financial impact it will have on the Klamath Tribe's economic self-sufficiency plan.

This project, if successfully implemented, will have a significant positive financial impact on the Tribe's Economic Self-Sufficiency Plan. (Tribal Government, Chiloquin, OR - #10116.40300)

Public Concern: The Forest Service should consider the impacts of this proposal on subsistence hunting and fishing.

Kruzof Island is a beautiful scenic area that has high value for recreational, and subsistence use. It is also highly valued as a historical and cultural site. It is a very popular place for people to hike, beachcomb and hunt. It is the most popular place to fish. Thousands of tourists come to fish on charter boats and the view of Mt. Edgumbe is unparalleled. Historically there are many World War II sites on this island. Road building and logging activity would greatly harm this area and is totally unnecessary with the current demand and market value for timber being as low as it is.

Further logging of St. John Baptist Bay and Nakwaasina Sound would result in the loss of recreation and subsistence deer hunting areas also. We are skiff fisherman and logging of this area would force us into areas that are hard to access. (Individual, Sitka, AK - #6022.90000)

In addition to wage employment, traditional gathering of subsistence foods plays a substantial role in Southeast Alaska's rural communities. Since time immemorial, subsistence has been a way of life and culture for Alaska Natives. Non-Native immigrants to the region have also learned to rely on harvest of wild game and fish. Eighty-five percent of the rural households in Southeast Alaska harvest some kind of subsistence food and nearly one-third of rural households supply half their need for fish and meat by hunting and fishing. Subsistence may provide 70 to 80 percent of the protein consumed in less accessible households in the Gulf of Alaska region. Reductions in wildlife and fish populations threaten the foundation of Native culture and the classic Alaskan tradition of living off the land. (Environmental/Preservation Organization, Nevada City, CA - #50392.93700)

Because most of the commercial logging and road building that has occurred in Southeast Alaska over the last 50 years has happened on public and private lands surrounding Native villages, there is a risk that the Forest Service will attempt to compensate for lost timber volume. To reduce this risk, the Forest Service must consult with federally recognized tribes on a government-to-government basis. Consistent with the federal trust responsibility and as required by Executive Order 12898, the Forest Service should use this consultation process to ensure that implementation of the roadless policy in the Tongass will advance the interests of tribes in protecting and maintaining customary and traditional subsistence use areas. (Individual, Juneau, AK - #52964.55000)

As an Alaskan, I wish to keep my subsistence foods, and the subsistence foods of all Alaskans, healthy. This right to live off the land is one that has been denied to most every other state. I want the F.S. to protect the roadless lands that we all rely on. (Individual, Cordova, AK - #6016.90400)

Gravina Island has been used by many generations of Alaska Natives--Tlingit, Haida and Tsimshian, for traditional hunting, fishing and food gathering. KIC (Ketchikan Indian Corporation) would like to see that this area is available for future generations. (Tribal, Ketchikan, AK - #13987.92300)

These subsistence gathering activities provide significant social and ecological values. There is a lot of archeological evidence on Gravina Island which shows how important this area was and still is. Any road construction would jeopardize these values. (Tribal, Ketchikan, AK - #13987.90230)

RESTRICTIONS ON ROAD MAINTENANCE WILL NEGATIVELY AFFECT SUBSISTENCE ACCESS

Because the Tongass is a unique forest you need to look at the special problem it creates. The roads that are built up here grow over in five to six years. Some of the roads I used to hike on are now all grown over, so much so [that] no one can use them anymore. Folks in Southeast Alaska use roads like trails, to gain access to the Tongass.

I also feel by limiting the roads you would be hurting the subsistence hunters and fishermen. I know myself when we go hunting and fishing for subsistence use, we use the Roads to access the forest. By limiting the roads you are hurting our subsistence hunting and fishing and our way of life.

Unless you have been to the Tongass and hiked in the forest it is hard to understand the unique qualities the Tongass Forest has. Because the forest is so densely forested, roads are a way folks use to access the forest for recreational use and subsistence use. By limiting Roads you limit the use of the forest to only those folks who can afford to access the Tongass forest by other means--float plane or helicopter. If you have ever rented one of these, it starts at \$500.00 an hour, making it impossible for us common folks, living on subsistence hunting to get us by through the winter, to access the forest. So in a way this Roadless issue is a way of discriminating who has access to the forest. Only the RICH can use the forest if the roadless initiative is passed. (Individual, Ketchikan, AK - #8117.90400)

Public Concern: The Forest Service should address the impacts its decisions will have on the family and family recreation.

It's time to consider not only your environmental impact, but the most important of all the impacts these decisions will make on the FAMILY, yes the FAMILY IMPACT!!!!!!! (Individual, No Address - #7082.92200)

I've been riding for almost all my life. I've also been taking my family riding. It's something I love, to see your children conquer the obstacles on the trails; to see them fall, look up at you, smile and get back on. It makes me proud when my children come to me and ask me how they can become better riders. This is an activity that not many families can do together but it's one that mine does. And I know that if the trails close it will become harder for us to keep riding. We need to protect our national forests for the future, but they can be preserved for the public instead of from the public. (Individual, Sacramento, CA - #14700.92200)

My family uses off road motorcycles to enjoy God's Creation. We use this as our chosen form of recreation to help keep our family strong and together. This roadless policy is attacking my family's ability to access nature and God's intention to build good families. I consider this an attack on my family and will never cease opposing this effort. (Individual, Houma, LA - #16486.92200)

ANY GOVERNMENT ACTION LIKE THIS PROPOSED ROADLESS PLAN, WHICH WOULD FORCEFULLY BREAK-UP VETERANS' FAMILIES, CANNOT BE TOLERATED.

Past government policies in this region of the United States have shut down job-creating industries and businesses making it impossible for the children of veterans' families to find employment locally. As a result, it has become impossible for veterans' families to live in the same locale because their children have been forced to scatter all over the country to find work. This proposed government roadless land scheme is another one that would enormously compound and multiply this problem, thereby reducing even further the cohesiveness of the families of our veterans. (State Agency, Casper, WY - #16281.92200)

We also must recognize the need for ethnic minorities who need developed sites for their large family-cultural integrity activities. (Individual, Ruth, NV - #27639.92200)

Public Concern: The Forest Service should evaluate the need to conduct multi-cultural studies.

Your study on multi-cultural jobs is meaningless. Are we all not Americans? By putting people in a caste system and into races, you only hinder the positive effects that have been made over the years concerning bringing races together. (Individual, Springville, CA - #2059.90010)

7.1.3 Aesthetic and Scenic Values

Aesthetic and scenic values comprise a major concern for many respondents, from a variety of perspectives. Some merely request clarification of how scenic quality is being defined and addressed, while others are concerned about the effect different resource management activities may have on scenic values. With respect to this latter concern, some respondents fear that lack of roads and lack of active management will lead to a decrease in scenic values since forest lands will be killed by insects and disease and catastrophic fires. According to one recreational organization, "If one of the objectives of the Roadless Area Conservation Rule is providing view areas, please advise the public on what will eventually happen, and what the areas will look like after the trees are bug killed or burned. We do not find the Thunder Mountain area very pleasant to observe after the fires of 1994. If those 18,000 acres had been logged in a manner that would have left 50 or so GREEN trees to the acre, we would have harvested trees to build homes with, and have a new crop of trees growing, would have desirable wildlife habitat, and a view worth looking at." Others speak of how unsightly roads and clearcuts are, and how these signs of human development tend to destroy scenic values. "When we go to see the natural beauty of our national parks and forests," states one individual, "we want to see wildlife, trees, flowers. What we DON'T want to see is tree stumps, bare hillsides once rich with vegetation and enormous machinery belching black smoke."

Public Concern: The Forest Service should explain how scenic quality is being addressed.

Page 3-133, Alternative 1-- The document states that "...modifications to the landscape will be most severe in this alternative because there would be no national prohibitions as a screen during planning." This statement is untrue and very misleading. It is obvious the author does not understand that in the forest planning process areas were assigned "Visual Quality Objectives" or "VQO's." It appears this concept has been replaced by Landscape Character Goals and Scenic Integrity Objectives. Whatever they are called, objectives are identified as standards in the forest plan and managers do not have the discretion to violate them without amending the forest plan (through NEPA processes). These are not national prohibitions, but local planning standards that have the effect of an appealable issue.

Relief: The Forest Service must accurately disclose the current planning process and how scenic quality is addressed as a forest plan standard. (County Elected Officials, Worland, WY - #16185.90210)

Public Concern: The Forest Service should address the effects of insect and disease outbreaks and catastrophic fires on scenic quality.

Page 3-133, Cumulative Effects-- As has been documented many times in previous sections, the potential for catastrophic fire and insect and disease outbreaks will increase under the "Proposed Action" alternatives. Entire watersheds can be completely altered in a matter of a few hours. The effects of this potential must be disclosed far more thoroughly than simply stating (page 3-133, fourth paragraph), that in the long run, scenic integrity could be maintained or improved.

Relief: The Forest Service must specifically address the effects of insect disease outbreaks and catastrophic and large fires on scenic quality. The effects disclosure is not adequate to compare alternatives. (County Elected Officials, Worland, WY - #16185.90210)

On page 3-132 it states that inventoried roadless areas are generally high to very high in scenic quality. This high quality is at risk if either Alternatives 2, 3, or 4 are adopted. This is due to the volume of dead timber that will develop in these areas and the resulting catastrophic fires that will blacken these stands. (Business, St. Maries, ID - #28102.83310)

If one of the objectives of the Roadless Area Conservation rule is providing view areas, please advise the public on what will eventually happen, and what the areas will look like after the trees are bug killed or burned. We do not find the Thunder Mountain area very pleasant to observe after the fires of 1994. If those 18,000 acres had been logged in a manner that would have left 50 or so GREEN trees to the acre, we would have harvested trees to build homes with, and have a new crop of trees growing, would have desirable wildlife habitat, and a view worth looking at. (Recreation Organization, Omak, WA - #1065.90210)

Public Concern: Road building and other forest management activities should be prohibited to preserve scenic beauty and aesthetic experiences.

It's clear from many opinion polls that American voters want to see our public lands protected from logging, mining and other environmentally damaging enterprises. When we go to see the natural beauty of our national parks and forests, we want to see wildlife, trees, flowers. What we DON'T want to see is tree stumps, bare hillsides once rich with vegetation and enormous machinery belching black smoke. (Individual, Kansas City, MO - #452.90210)

As an educator of our youth, I value the items and concepts we are able to pass on to our youth like knowledge, money, medical advances, buildings and so forth. However, the natural beauty of this country, our unsoiled land, is the most precious resource we have for ourselves and for our future generations. If we destroy the original beauty of this country, we cannot replicate or replace it. During a recent overseas trip I marveled at the ancient beauty of the cathedrals, plazas, statues, and palaces. It took me several days to realize there was something missing from every site I visited. These remarkable places did not have grass nor very few trees! As I took further notice these places hardly had any ground showing at all. Everything was concrete or cobblestone. Please do not allow that to happen to this young country. Do not allow those with power, but no vision or understanding of what natural beauty is, to speak for us all. (Individual, Morristown, IN - #5418.92300)

Remember NO ONE wants to go to a forest to see a BARE mountainside. (Individual, No Address - #195.90210)

The national forests are not theme parks, they are wild preserves that should be cherished and their innate beauty protected. (Individual, Brooklyn, NY - #930.90210)

One of the saddest things I have ever seen is the extent of logging in the mountains of Washington state. It made me cry the first time I saw it from an airplane. Please don't let it happen anymore. (Individual, Richardson, TX - #3139.90100)

There is nothing more disappointing than to take a hike or bike ride only to see the mountainside devoid of trees standing against the skyline bare to the elements of nature. The world has email, video conferencing via internet, there is NO need for continued logging within our national forests. (Individual, No Address, - #195.90200)

Clear cuts and roads are not adding to the beauty of Alaska. (Individual, Sterling, AK - #845.90210)

It is my experience that old growth forests are entirely different ecosystems and offer aesthetic experiences that are not present in other management areas. I believe the knowledge and experience of mature, historic forests is a valuable national asset. (Individual, Roseville, MN - #6796.83610)

Protecting these scenic wilderness areas also makes sound economic sense. Roadless areas provide scenic vistas, hunting, camping, hiking and touring opportunities that can retain current residents and businesses, while also attracting non-resource extraction businesses. (Town or Municipality, Minneapolis, MN - #5392.91000)

7.1.4 Bequest Value to Future Generations

A great number of respondents are concerned about the kind of world this generation will leave to future generations. In addition to original letters, a substantial number of form letters cite concerns about future generations in the text, and many persons reiterate those concerns in the additional comments they supply. However, opinion varies widely among respondents.

Many proponents of the proposed rule request roadless areas be preserved intact for future generations. One individual claims, "Growth and development in this area is aggressive and is permanently reshaping this and many other mountain community areas. The level of activity is represented in the backcountry as well, and we must move equally aggressively if we are to secure a portion of our natural heritage for future generations." Others believe the preservation of roadless areas is required to pass on important environmental values such as clean air, water, etc. Some maintain as well that we must leave some areas undeveloped and undisturbed so future generations will have the opportunity to determine for themselves how these areas should be used.

Those opposed to the proposed rule, however, believe that by restricting use and access to these areas future generations will lose any sense of contact with or value for the land. Many of these respondents want their legacy to be the continued ability to recreate in the same ways they have-- this includes keeping access open for riding off-highway vehicles. One individual writes, for example, "I'm a 3rd generation off road recreationalist. My family and my children's families need to have security in knowing that there will always be a place for them to enjoy their hobbies." Another citizen states, "My children have already enjoyed such access and activities and plan to continue to do so, and it makes no sense to close off access in the interest of some hypothetical 'children' of the future who will likely never learn to enjoy our forests, due to lack of access."

Public Concern: The Forest Service should assure that the final rule will benefit future generations.

PRESERVE FOR FUTURE GENERATIONS

In the past few years there have been significant increases in development pressures throughout the Rocky Mountain states. I have lived in this region my entire life, and in the Gallatin Valley for over twenty years, and the recent growth rates are unprecedented. Growth and development in this area is aggressive and is permanently reshaping this and many other mountain community areas. The level of activity is represented in the backcountry as well, and

we must move equally aggressively if we are to secure a portion of our natural heritage for future generations. (Individual, Bozeman, MT - #2782.90100)

In the future, actions taken now to protect biodiversity will be seen as foresightful and wise, needless consumption of lands and resources will be seen as wasteful and tragic. (Individual, Swarthmore, PA - #1323.92300)

Yes, jobs will be affected (logging, mining, less homes on mountain tops). The effect trickles down through the economy. BUT what will we have left to give generations beyond ours? What future will we be giving to the ecosystem (wildlife, rivers, streams, water life, forestry, scenery, air quality, etc.)? (Individual, Anaconda, MT - #859.92300)

What are we going to say to the next generation, 'We didn't care about our forests and now we leave to you a bunch of highways, pollution, and logs'? (Individual, Redwood City, CA - #2638.92300)

I would like to see as much of what is left preserved as possible, even if this program sends the cost of lumber and lumber products skyrocketing. It's a big price on the present, but a priceless gift to our descendents. (Individual, Monpeller, VA - #1427.92300)

What will we tell our children and grandchildren when they ask, 'What was television like, what is an automobile, and Grand Dad, is it really true that people could communicate miles and even countries apart with one of those telephone things?' More important, what do we tell them when they ask 'what is public land? Why can't we use the land if it belongs to the people?' and 'what was it like when we could use public land?' Then while we are standing under a pine tree we so feared to cut, eating berries, roots and whatever we could hunt with a rock or a stick, let's not forget to tell them how we lost all this by not standing up for THEIR RIGHTS. (Individual, No Address - #41.92300)

My reason for supporting this alternative [alt 4] is very simple: I am 62 and have been hiking in the national forests since my teens. It has been a priceless experience. We owe it to future generations of Americans to have the opportunity to enjoy that same experience. It is a requirement of social justice. (Individual, Sacramento, CA - #6403.92300)

... We must apply GOOD HUSBANDRY, an old English meaning for "to-husband" is to care, tend, plan and be willing to protect and pass on this precious environmental heritage to the next generation - INTACT!
This is different from "stewardship", the management of another's property, finances, etc. - as an administrator or supervisor. (Individual, Pittsfield, VT - #13280.90200)

ALLOW FUTURE GENERATIONS TO RECREATE

Denying vehicular access will drive many people out of the national forest. After a generation has been denied this access, what will they care about the future or usage of the forest? They won't have any relationship with it. (Individual, Springdale, AR - #2273.92300)

I want to be able to take my son and daughter down the same off road trails that I have taken when they are old enough. (Individual, No Address - #19865.92300)

My children have already enjoyed such access and activities and plan to continue to do so, and it makes no sense to close off access in the interest of some hypothetical "children" of the future who will likely never learn to enjoy our forests, due to lack of access. (Individual, Reno, NV - #16264.92300)

I'm a 3rd generation off road recreationalist. My family and my children's families need to have security in knowing that there will always be a place for them to enjoy their hobbies. (Individual, Agoura Hills, CA - #25894.92300)

7.2 Economic Effects

This section addresses public concerns about the economic effects of the proposed rule. Section 7.2.1 covers general economic effects; Section 7.2.2 addresses the economic effects on forest dependent communities; Section 7.2.3 discusses concerns surrounding the local tax base, Payments in Lieu of Taxes (PILT) and the 25% fund; Section 7.2.4 deals with grazing permits and fees; Section 7.2.5 covers minerals, oil and gas; and Section 7.2.6 addresses agency costs, financial responsibility, and funding in general.

7.2.1 General Economic Effects

Those in favor and those opposed to the proposed rule differ in their perspectives on the underlying economic value of roadless areas. Industry groups and those with views and values most closely aligned with them, including many western elected representatives, maintain that the greater economic value of roadless areas lies in harvesting or in developing the natural resources found there. One federal agency states, for example, “There is also a significant public interest in allowing access to natural resources in order to preserve our economic base. The potential economic impact of this proposal on small businesses and small communities could be devastating. Prior to implementing such a rule, the Forest Service should make every attempt to understand fully the economic impact of its actions and to find less burdensome or mitigating alternatives.” Many of these respondents find flaws in the economic analysis found in the Draft EIS, stating that the analysis should be done on a site-by-site basis, that it should include data from individual counties, that the analysis “is so shallow that it is useless,” that the underlying assumptions are faulty, or that some important aspects of the relationship between resource use and the economy were overlooked. Additionally, respondents request the proposed rule be based on sound science and not threats of litigation or pressure from special interest groups.

Those in favor of the proposed rule take a different view. Indeed, for nearly every point that opponents of the proposed rule make, supporters have a counterargument. While those who support resource extraction believe the greater economic value of roadless areas lies in development, the environmental community and those holding similar views believe it lies in the preservation of roadlessness. And while those who support resource development comment on the importance of those resources to our economy and quality of life, the environmental community points to the economic benefits of ecosystem services, such as air purification and water filtration, and recreation and wildlife habitat, and claim that these services are worth more than resource extraction. Many of those who support the proposed rule go on to suggest that an economic base that does not rely on extractive industries is more reliable for a community or more profitable for workers, while those opposed to the proposed rule dispute that claim. These writers point out that recreational activities which depend on roads generate more income than recreational activities which do not depend on roads. Likewise, those in support of the plan maintain that road construction and other development in roadless areas is detrimental to the economy, while those opposed argue that prohibitions on road construction and resource development will harm the economy.

Public Concern: The Forest Service should reevaluate its economic analysis of the importance of forest resources to the economy.

The Forest Service should start from scratch with a new cultural and socioeconomic analysis that does not gloss over the concentrated negative impacts on dedicated American citizens, and fully addresses the many long term consequences implicit in this proposal. Such consequences may include denied opportunity to discover and develop new forest products, new recreation opportunities, new mineral and petroleum reserves, [decreased ability to] manage noxious weeds, among others. (Individual, Whitefish, MT - #30417.93100)

The Office of Advocacy recognizes the importance of protecting the environment, conserving our national forest, and preserving the natural beauty of the area. However, there is also a significant public interest in allowing access to natural resources in order to preserve our economic base. The potential economic impact of this proposal on small businesses and small communities could be devastating. Prior to implementing such a rule, FS should make every attempt to understand fully the economic impact of its actions and to find less burdensome or mitigating alternatives. In the alternative, it should explain fully why these alternatives will not help FS achieve its environmental objectives. As advocacy has stated on several occasions the requirements of the RFA are not intended to prevent an agency from fulfilling its statutory mandate. Rather, it is intended to assure that the economic impacts are fairly weighted and considered in the regulatory decision making process. (Federal Agency, Washington, DC - #54012.93100)

Most of the analysis outside the timber sector is so shallow that it is useless in making an informed decision on the proposed rule. This applies not only to the mining sector, but also to any sector outside of the timber industry in the document. The supposed economic benefits of the "deep ecology" viewpoints represented in the cost-benefit analysis are absurdly "qualitative" and fuzzy. Economics requires quantitative examination of both the costs and benefits, even if federal law allows for the inclusion of qualitative analysis in the cost-benefit analysis supplied in support of a DEIS. I would accept the fuzzy, deep-ecology benefits stated in the DEIS if the DEIS were more competently drafted to show the costs of the proposed rule. There is sufficient data available to construct the cost analysis of the proposed rule. The DEIS and cost-benefit analysis supplied with the proposed rule is clear evidence (and freely admits) that the study of the impact of the proposed rule was rushed. The claims, for instance, that there is no national-level data on the economic impacts of the proposed rule on mining is not sufficient reason why there is no substantial economic evaluation of impacts to mining. There are copious data available at the state and county level in Nevada and from the land-grant University of Nevada of the economic impacts of mining with which a more quantitative DEIS could be issued. The USFS should consult with sources of data at the state and local levels to complete the DEIS. There is no pressing reason why the proposed rule needs to be rushed in the manner it has been; this proposed rule can be safely deferred until such time as a complete DEIS and economic analysis has been properly completed. (Individual, Reno, NV - #44188.93100)

The current administration thinks that all federal land needs to be wilderness. My position is that the more you lock up the federal land, the poorer the people in those counties will be. Look at rural Utah. Most counties where there are large tracts of federal land, save Washington County, the income level is much below the Wasatch Front. The only counties in rural Utah that have decent incomes are Carbon and Emery Counties, where coal mining and the related industries provide decent, year-round jobs paying above poverty-level salary. (Individual, Monticello, UT - #2205.90000)

I oppose the roadless initiative because:

The DEIS seriously underestimates the proposal's economic impact by establishing a low base for analysis and minimizing the likely changes. (Individual, Riddle, OR - #8020.93100)

What are the social impacts to the American public if the non-federal landowners in this roadless area are permitted limited or unrestricted access to their lands?

What are the economic impacts to the American public if the non-federal landowners in this roadless area are permitted limited or unrestricted access to their lands? (Forest Products Association, Eugene, OR - #15879.90010)

Public Concern: The Forest Service should expand its economic analysis to include a quantitative assessment of a complete range of forest resources.

The Forest Service admits that its assessment method conducts a "qualitative" analysis of most impacts. In fact, the analysis only provides a "quantitative" evaluation of agency costs, timber, and road construction and reconstruction - and framed mostly in a negative context. There are many associated impacts that are not "quantified" and relate to recreation use, stewardship timber harvest, fuel reduction, catastrophic fire, ecological factors, wildlife, etc. We do not believe the Forest Service can make a reasonably informed decision based on this significant lack of information that is necessary to adequately analyze and disclose effects. (County Elected Official, Elko, NV - #17274.7000)

Public Concern: The proposed rule skews the economic analysis of reductions in timber harvest.

This proposal has grossly underestimated the economic consequences of this action by overstating timber volume offerings by the USFS and underestimating the ecological impacts of not being able to manage the forest with every tool available. (Individual, Summerville, OR - #10794.72600)

Public Concern: Protections for roadless areas should be determined on a site-by-site cost/benefit basis during forest planning.

The concept of prohibitions, procedures, and Tongass alternatives is unacceptable, in my opinion, because it does not take into account the great differences in the 51.5 million acres of inventoried roadless areas. It seems to me that the concept must be adjusted so that the proposed rule and supporting environmental analysis would call for prohibitions of only those areas that show that the benefits exceed the costs. This concept would begin with a detailed analysis of each roadless area at the time the forest or grassland plan is revised. The decision as to which roadless areas are given permanent protection without roads would be made by the chief by regulation. (Individual, McMinnville, OR - #739.61300)

Public Concern: The Forest Service should include economic data from individual counties.

Where is the analysis of the impacts on counties? When did anyone bother to ask what the impact is on Fremont County? Does the federal government really believe that they know more about issues in Fremont County related to recreation use, stewardship timber harvest, fuel reduction, catastrophic fires, ecological factors, wildlife numbers? I don't think so. Counties in Wyoming have spent hundreds of thousands of dollars in the past few years coming up with credible data concerning the economics of each of these issues and the Forest Service has not even bothered to ask county commissioners for the data. (County Elected Official, Lander, WY - #13193.41400)

Public Concern: The Final EIS should display the financial contribution of roaded versus unroaded recreation to local economies.

Page 3-170, Alternative 1-- There needs to be a section that displays the financial contribution of roaded vs. unroaded recreation to local economies. Studies have shown that roaded recreational users contribute more dollars to local economies than unroaded recreational users. Since this document supports roadless area uses, then local governments must know what the impacts will be to local economies as a result of the "Proposed Action". The conclusion will most likely illustrate that roaded recreation contributed more to local economies than roadless recreation. In addition, Alternatives 2-4 do not address recreation jobs, economic contributions to economies, etc. (County Elected Officials, Worland, WY - #16185.91200)

I also believe that this initiative has the potential to become a disaster to the people of Utah and the nation. Many rural communities rely on tourist money for their economies, and let's face it wilderness does not generate tourism. (Individual, Salt Lake City, UT - #6062.93200)

The Roadless Areas Initiative has been poorly planned, as evidenced by the lack of funding to preserve these lands. The Forest Service budget keeps getting cut, the income from managed logging is gone, and now the income from recreation is being attacked. Where will the money come from to maintain these areas, if they are to become non-income producing Wilderness areas? (Individual, North Charleston, SC - #8277.93600)

Public Concern: The Forest Service should address the benefit of roadless areas to the national economy.

HAVING ROADLESS AREAS DOES NOT HARM THE ECONOMY, IT ENHANCES THE ECONOMY. (Individual, Markleeville, CA - #236.93000)

Some people are in opposition to the "Roadless Initiative" for reasons that are not related to actual roadbuilding. One common argument is for the continuation of extractive industries throughout the National Forest System. It is said that we need these "natural resources" to continue to grow economically to maintain our standard of living, and to provide for a growing population. Comments on the NOI attributed rising housing prices to restrictions on logging. All of these things are false. Nationally, we get less than 5% of our wood products from national forests. And, because roadless areas make up only a small portion of the National Forest System, the percentage of logging that would be actually affected by the elimination of resource extraction on roadless areas is only a small percent of that. (Environmental/Preservation Organization, No Address - #1826.71220)

Public Concern: Analysis in the proposed rule should be based on sound science, not on economics or the desire to avoid litigation.

I ask that you consider the following guideline in your decision: Ensure that your decision is based on sound science. (Individual, Arvada, CO - #9226.42000)

I note that one of the facts given in support of the revised rules is that legal costs may be reduced (Table S-4 DEIS Summary & Proposed Rule." "Savings in legal costs related to inventoried roadless areas are anticipated" and FS-670, May 2000, " Local appeals and litigation....could be reduced." This hardly seems a scientific basis for decisions. (Individual, Tigard, OR - #9199.93000)

Public Concern: The proposed rule should be based on sound, sustainable economics with the future in mind, not narrow interests.

I understand that the voices of industry and development are easily heard, with their immediate benefit payoffs in commerce and jobs. However, the voices of those of us with the long-term health of our economy in mind, speaking about sustainability and the future, are less loud, and less easily heard. However, we do exist, in the thousands and millions, in the voice of your neighbor or a small child, or a person in a generation to come. (Individual, Des Moines, IA - #9901.41720)

The arguments of keeping jobs and of "wise use" represent the needs of narrow interests. Allowing logging companies to destroy the last vestiges of the once great forests of this country will not help them for long. But after the last good trees are gone, we will have lost the kind of legacy that Theodore Roosevelt intended at the turn of the 19th century. (Individual, Arlington, VA - #4740.41730)

Continued development without restraint is like a cancer, it will soon consume its host. Our Congressional delegations in the west seem to want to stimulate the growth of this cancer by supporting the developers. It's pretty

obvious they are not listening to the majority of their constituents probably because they are too busy listening to their major campaign fund contributors. i.e., the loggers, miners, and other developers (I needed to vent that bit of frustration, I know that the USFS has to live with the pressures that come from that kind of influence. (Individual, Idaho Falls, ID - #9381.42000)

You are the agency charged with managing these lands for the future. Your biologists know the effects of roads and the other activities mentioned above on sensitive and endangered species and you must listen to them and to the voices of the public who are not tied economically to public land. A logging company will always take the position that their operation does no harm because it is in their economic interest to do so. The same applies to oil, mining and ORVs. Their input simply cannot be given the same weight as that of concerned citizens, the true landlords. I urge you not to cave in to pressure from industry and to do what is truly the right thing; to give these roadless areas full protection for the sake of the future. (Individual, Cody, WY - #7591.41000)

Public Concern: The Forest Service should complete a thorough cost/benefit analysis for the proposed rule as a whole.

As discussed in greater detail in our critique of the cost-benefit analysis and other documents containing information on the economic impact of the proposal, the Forest Service has completely failed to adequately analyze the potential costs and benefits for the proposed rule as a whole and for mining impacts in particular. One purpose of a DEIS is to analyze the costs and benefits of a proposed action, including the impacts on the environment and economic factors. Thus, the DEIS can weight competing alternatives and their impacts to allow the decision-maker to find the means by which a balance is created that can maximize benefits and minimize socio-economic costs. See 40 C.F.R. [section] 1508.14 ("when an environmental impact statement is prepared and economic or social and natural or physical environmental effects are interrelated, then the environmental impact statement will discuss all of these effects on the human environment.").

While the DEIS acknowledges that the preferred alternative would result in "fewer mining-related jobs, less income, and a reduction in U.S. Treasury receipts and PTS [payments to states] generated from mineral activities," the DEIS then states "there is not enough information available, however, to quantitatively estimate the degree to which jobs, income, and revenue would be reduced by the proposed rule." DEIS at 3-194. The requirement to gather applicable data is incumbent on the proponent of the proposal, not the potentially affected entities. This demonstrates that the necessary EIS information for the public to make an informed decision is incomplete and that the proposal and process are premature. The proposal should be withdrawn until that information can be properly collected and analyzed. (Mining Association, Reno, NV - #15907.93000)

Cost-Benefit analysis requires that "If a cost-benefit analysis relevant to the choice among environmentally different alternatives is being considered for the proposed action, it shall be incorporated by reference or appended to the statement as an aide in evaluating the environmental consequences." No economic or cost-benefit analysis is included in the draft EIS. The proposed action will have a huge economic impact. (Individual, No Address - #30481.93100)

Public Concern: The Forest Service should consider the relative economic worth of recreation in relation to resource extraction.

"Only eight percent of National Forests in the Southern Appalachians is legislatively protected from road construction, logging, mining and other destructive activities. This is a perilously low figure considering that recreation in National Forests contributes 30 times more to our national economy than logging." (Individual, Greenwood, SC - #1016.10100)

Recreational visits in our national forests generate far more revenue to our state's economy than clearcutting these natural treasures. Your own agency estimates 110.7 billion dollars will be generated in 2000 on our national forest lands, 27 times the revenue from logging, without the destruction. (Individual, Bellingham, WA - #1954.91000)

In the two years I have visited the Chippewa, Superior, Jefferson, and various other National Forests, I have spent over \$2,500.00 while in these forests on extensive canoe and camping trips. This is money that goes directly into the pocket of local business owners and land owners. If these forests are decimated as planned by the timber industry, the local business owners and politicians and land owners ALL will lose me as a source of income. (Individual, Minneapolis, MN - #3673.91000)

Here in N. Georgia, our economy benefits from these recreational areas--more so than any logging or mining! (Individual, Mount Airy, GA - #1705.93000)

Many businesses have endorsed the keeping roadless areas roadless idea as well, knowing that recreation in national forests contributes 40 times as much to the economy as logging, and creates 20 times as many jobs. (Individual, Silver Springs, MD - #1945.93000)

I grew up in Humboldt County, a place enriched with thousands of acres of trees. While most of the trees were second and third growth, a large number of ancient redwoods were preserved. No amount of money could compare to these trees. And I would wager a guess that the money brought in by tourism in the redwoods is far greater than the value they would have brought in by going horizontal. I would like to voice my full support of Clinton's plan to save miles of virgin lands. (Individual, No Address - #209.90200)

Just using snowmobiling as an example, we know that in Utah, alone, snowmobilers pump upwards of \$105 million annually into the economy, a lot of which is in rural economies. Snowmobiling has a \$6.2 billion annual economic impact nationally in the U.S. There are 1,570 licensed snowmobile dealers in the U.S., 1.5 million registered snowmobiles and over 125,000 miles of snowmobile trails in the U.S. (a lot of which are in "roadless areas"). The point here is, the Forest Service has not even begun to make a dent in determining the true economic impacts of their proposal. Adding similar statistics as the above for mountain bikes, motorcycles, 4-wheel drive vehicles and ATV's would obviously produce mind-boggling figures. **THE FOREST SERVICE NEEDS TO DO A BETTER JOB OF DETERMINING WHAT THEIR ACTIONS WOULD DO TO THE ECONOMY IF MOTORIZED RECREATION IS SIGNIFICANTLY IMPACTED BY THEIR INTENTIONS.** (Individual, Sandy, UT - #25912.93000)

Public Concern: The Forest Service should reconsider the assertion that substituting recreation income for timber harvest can provide superior economic benefits.

RECREATION. The DEIS is based on inaccurate information with regard to recreation demand and economic contributions of recreation tourism. This type of information is what the Administration hangs its hat on in terms of claiming there is a need to adopt the roadless initiative. In other words, by stopping road construction, recreation and tourism would benefit. This is not the case. In fact, the DEIS fails to recognize that while recreation was increasing, timber management, including road building, was occurring. In other words, recreation and timber management are compatible. On page 3-168, recreation is reported to support 220,000 jobs in the Columbia River Basin (USDA 1997 a.). The original report shows those to be jobs on federal lands of which 190,000 were associated with recreation. Page 2-168 of the ICBEMP SDEIS states that this figure should be corrected to about 77,000 jobs (Crone and Haynes in press). It appears that the recreations figures used in the Roadless Area DEIS are off by approximately a factor of 3, a significant error.

The DEIS also says on page 3-168 "In the Southern Appalachian region, Outdoor recreation tourism contributes almost \$6 billion in business sales and creates employment for over 100,000 workers in the region (SAMAB, 1996b)." "As a result of the high level of outdoor recreation use on NFS lands, the Forest Service has been shifting the focus of multiple use land management away from commodity production and toward recreation and related amenity uses (Driver and others 1999)." The DEIS fails to look at the facts and therefore, the above statement is wrong. The "SAMAB" site is really the result of work done by the Southern Appalachian Assessment. The analysis used on this recreation tourism is flawed as it compares apples with oranges when the assessment contrasts the performance of different industries. Specifically, the assessment summed up the benefits of tourism by looking at the direct, indirect, and induced effects. However, when the benefits of forestry were reviewed, only the direct effects were studied. (Business/Business Association, Washington, DC - #29962.91000)

I strongly resent your comments in the draft roadless EIS regarding timber jobs, and represent to you that the Beaverhead Deer Lodge National Forest in which I reside has been unable to demonstrate the positive effects of promoting the recreation/tourism sector of our rural economy. (Individual, Dillon, MT - #10860.90000)

NONE of the higher paying jobs in the community are in the recreational tourism sector, in which your draft EIS indicates people like myself could or should seek employment. (Individual, Dillon, MT - #10862.93710)

Public Concern: The Forest Service should encourage environmental protection rather than resource extraction because it offers superior economic benefits.

The Forest Service has, in its possession, models and data the agency can utilize to estimate the socio-economic values of unlogged forests and the externalized costs of logging. The Forest Service regularly employs these data and models outside the scope of the timber sale program. In fact, when oil companies or toxic chemical manufacturers damage natural resources on Forest Service lands, the agency employs these models and data to estimate the amount of economic damage for which the federal government must be compensated. These estimates include ecosystem service values, and values associated with recreation, tourism, fishing, and other uses. (Environmental/Preservation Organization, Weldon, CA - #16041.93644)

If there is a part of any forest that is proposed for roads, grazing, logging, mining, including oil and gas, an EIS which discusses the negative impacts versus the jobs provided should be required. I doubt if there are any such projects that produce enough long-term high paying jobs to justify any negative impacts. It may take an EIS to determine if the social and economic benefit of an existing road that could be "put to bed" allows the road to be obliterated. (Individual, Bakersfield, CA - #974.93100)

People have commented that local economies depend on resource extraction, and that not allowing extraction from all of our public lands will doom them. The facts speak otherwise. Far from dooming local economies, wilderness areas and pristine forest bring in, on average, 38 times as much money as logging or mining. Eco-tourism and hospitality industries are often locally owned and sustainable whereas large extraction companies are often owned by far off conglomerates and will move once the resources are gone. (Environmental/Preservation Organization, No Address - #1826.93000)

The Bighorn National Forest is being run without an updated forest plan. The 1995 draft offered options that included a small allowable sale quantity for lumbering and large conservation areas to options that called for less conservation and more lumber (timber cutting). Public input was high and decisively called for the smallest cut and the most conservation. The draft established that the local economies were far more dependent on the aesthetic and recreation opportunities on the forest than they were on the timber. (Individual, Sheridan, WY - #3511.93200)

Each year as the forests are disappearing I see a climbing rate of people with lung ailments they didn't have before. I see an increase of allergies to the man made pollutants that were, in other years, filtered away by the trees that don't exist anymore. I developed asthma 10 years ago. Since then each year I have developed more allergies. Is this just a coincidence? If you think so, check with the doctors around the country. See if the rate of allergy sufferers doesn't increase with the forests' decrease. I wonder if people figured this out, who they would hold responsible for their increased health costs? (Individual, Oklahoma City, OK - #3130.90000)

Roadless areas help recharge aquifers and are often in the headwaters, resulting in lower water treatment costs for local residents. In fact, 80% of our nation's water supply comes from national forests, with roadless areas producing the purest of that water. (Individual, Marrero, LA - #261.83100)

Outfitting is just one economic benefit of roadless areas. Agriculture depends on the measured runoff that forested slopes provide, undisturbed bird habitat provides valuable pest and insect control, 30,000 tourism jobs depend on Montana's image as a "wild" place, the 300 million dollar wildlife industry (hunting, fishing, and wildlife observation) depends on roadless areas for wildlife habitat, clean water, and scenery. It is difficult to estimate the total economic value of roadless areas, but all indications are that these areas provide significant value to Montana's economy. (Environmental/Preservation Organization, Helena, MT - #53501.93000)

From an economic perspective, the ecological systems at issue are assets that provide economic benefit by satisfying a wide variety of human wants. Debates about the economics of public land use tend to focus on the commercial benefits of extractive activities such as timber harvesting, grazing, and mining. Such benefits are relatively easy to measure using market data. According to a January 12 letter to President Clinton signed by some of the country's leading economists, such a focus is too narrow: "There are non-extractive uses for which markets are either incomplete or nonexistent, but which nonetheless provide significant economic value. For example, many people enjoy recreating in pristine forest environments. Although these activities may not be purchased in market transactions, the time and other goods that people give up in order to enjoy them provide evidence of their economic value. Existing wilderness areas in our national forests and national parks meet some of this recreational demand. But as these areas become increasingly congested, the recreational value increases for other roadless areas that are currently unprotected" (Whitelaw et al. 1998). (Environmental/Preservation Organization, Nevada City, CA - #50392.94009)

7.2.2 Economic Effects on Forest Resource Dependent Businesses, Small Businesses, and Communities

This section captures the concerns people have about the effect of the proposed rule on resource dependent businesses, small businesses, and communities. A significant number of respondents comment that the analysis presented in the Draft EIS on the economic effects on businesses and local economies was flawed, and that the true impacts would be much greater. Many say the data used was skewed, incorrect, or not representative of current practices or trends, or that the underlying assumptions were faulty. A substantial number of respondents argue the proposed rule will negatively affect forest resource dependent communities and workers as well as those working in jobs indirectly related to the timber industry, while others state the impact will be miniscule because the amount of timber taken out of harvest is not substantial.

Some respondents claim the Forest Service should not use Rural Development funding to mitigate impacts of the proposed rule. One county elected official maintains that "...many of these dollars (Rural Mitigation funding) are allocated to communities for proactive rural development projects. Now the Forest Service comes along, makes an unpopular decision that will affect communities, and proposes to take funding from proactive communities to mitigate impacts....Therefore, communities that are currently using this funding to diversify their economy, attract new businesses, or strengthen their resiliency will find themselves stripped of resources while attempting to be proactive." Further, argues one individual, the argument that forest products companies should turn to value added timber is not justified. As this writer puts it, "I hear again and again how we need to go to value added. How we need to stop cutting trees. How to make do with fewer trees. It will not work. Trees are required for value added."

Respondents also argue that not only will local workers and businesses be affected, but that lumber prices and construction costs will increase nationally. Remarks one individual, "I would like to share with you the reasons that I feel the proposed roadless area rule is not good for our nation: It pushes up the price of wood products which makes homes more costly, which puts them out of the price range of the next generation." Additionally, a great many respondents believe the Forest Service should address the cumulative effects of this and other recently proposed rulemaking initiatives on small businesses. A mining association writes, for example, that "each of these new initiatives is, in itself, damaging to small businesses and the economic

health of rural communities. Taken together, the impact is devastating and will result in the demise of numerous small businesses and untold hardships on rural, resource-dependent communities.” Another respondent expresses surprise that the Forest Service deemed the small business impact report unnecessary “simply because the Forest Service does not keep track of the size of businesses it deals with.” (See also Chapter 3 for legal concerns about small businesses.)

Section 7.2.2.1 addresses specific public concerns over jobs and employment. Many respondents write that the analysis in the Draft EIS was flawed, that it understated the effect on jobs and employment, and that the actual number of workers affected would be much greater. Others state, however, that the true causes of job loss in the timber industry are technological advancements, the export of raw materials to other countries for manufacturing, and cyclical fluctuations in the demand for forest products.

Some comment further that the Forest Service does not need to make special efforts to retrain displaced timber workers inasmuch as many segments of society have had to make similar adjustments. Remarks one individual, “Yes, wood products are wonderful, but it is time to move on. The steam engine also was wonderful, and is now obsolete. What happened to the families whose income came from that industry? Or the families whose mainstay came from the eight-track tape industry? I am certain they moved on as the world changed. Timber workers too will adapt...” Some respondents, in fact, point out that communities adjacent to roadless areas attract a highly motivated, well-educated work force and provide new and innovative technological and communication based jobs. These jobs, respondents point out, can be established anywhere in the country, but roadless areas attract people because of the natural surroundings and quality of life they offer. Moreover, notes one writer, with unemployment at an all-time low, these workers can easily relocate.

A few respondents argue as well that it is not the government’s responsibility to attempt to counteract the economic forces affecting the timber industry and its employees. On the other hand, many respondents feel that the Forest Service or federal government should help timber workers adapt to a changing job market through education, compensation, and/or retraining programs. Some claim, however, that government compensation would amount to welfare, and would thus be unacceptable. Moreover, these respondents go on, it is unreasonable to suppose these communities can turn to tourism for sustainable income. As one person puts it, “They like to talk tourism as a savior of SE Alaska. Five months of tourism does not pay 12 months of mortgages, groceries, staff, whatever you want to try to spend your money on. We need year round sustainable income. We need sustainable timber.”

As noted already, many citizens comment on the adequacy of the economic analysis presented in the Draft EIS. According to one individual, the Forest Service used biased methodologies to assess the impacts of the proposed rule inasmuch as it failed to include job loss created by conservation policies and politically motivated actions over the past 10 years. In addition, several respondents claim the Forest Service should address the socio-economic impacts of the proposed rule on outfitters and guides working in roadless areas. As one respondent points out, “The socio-economic analysis is too narrowly focused on timber and fails to account for other small outfitting and guide businesses which operate in roadless National Forest lands.” Finally, a number of writers comment as well that the Forest Service has not considered the impacts this

proposed rule would have on Forest Service employment. It is suggested that with the loss of timber revenues, or with fewer acres to actively manage, the Forest Service workforce cannot be sustained.

Section 7.2.2.2 addresses public comment regarding the economic impacts of the proposed rule on the Tongass National Forest. A number of respondents argue that roadless protection would benefit southeast Alaska's economy. As one respondent maintains, "The Tongass National Forest, with its dramatic and undisturbed landscapes, provides most of the region's recreational and tourism opportunities and natural amenities. Accordingly, preserving the Tongass roadless areas is essential to the economic well being of Southeast Alaska." Others assert that because the cost of logging in the Tongass exceeds timber sale revenues, all American taxpayers would benefit from including the Tongass in the rule.

Others respondents, however, claim that including the Tongass would hurt southeast Alaska's economy. As one writer asserts, "If the Tongass is included in the Roadless Proposal...2/3rds of the planned timber harvest in the next five years will be eliminated...which will destroy the struggling, small forest products industry that remains." Some writers point out as well that postponing decisions on the Tongass until 2004 will also hurt Alaska's economy since, due to the uncertainty over future management direction, resource extraction industries will be loathe to invest in the area. Others express concern over the effect the proposed rule would have on surface transportation options in Alaska, one writer pointing specifically to the negative impact it could have on railroad companies.

Other respondents, however, believe that extending roadless protection to the Tongass would benefit fisheries and the fishing industry due to the protection it would offer to salmon spawning areas. Some write that at the very least the Forest Service should eliminate subsidies for road building and timber harvest on the Tongass; while, according to some, each timber sale should be required to include an analysis of the loss of tourism revenue the sale is likely to precipitate.

Thus most respondents fall decidedly on one side of the issue or the other. Some writers, however, believe there needs to be compromise. Says one individual, "Small-scale local value-enhanced logging (along established roads), and sustainable fisheries and wildlife populations, combined with tourism are the best way that the Tongass should go." Respondents holding this view believe the Forest Service should balance protection of fisheries and wildlife habitat with timber harvesting levels and roading on the Tongass.

Public Concern: The Forest Service should better analyze and address the economic effect the proposed rule will have on the timber industry and its employees.

Page 3-210, last paragraph--This paragraph discusses community resiliency as an indicator of a community's health and vitality. Many communities are reaching out to attract a diversity of businesses and diversify their economy. However, the fallacy of the argument presented is that processing timber from a raw material to a final product requires significant capital investments. Communities cannot attract these types of industries without some confidence that the flow of raw materials will be relatively stable.

RELIEF: The Forest Service must acknowledge that timber flow is an important element of community resiliency and Forest Service decisions have a significant effect. (County Elected Officials, Basin, WY - #43980.93720)

The DEIS trivializes the negative economic impact of reduced logging caused by Alternative 2, 3, and 4. This trivialization of timber harvesting by the DEIS is similar to other very misleading statements by the Administration (Glickman, National Audubon Society, 1996) (Dombeck, American Congress of Sportfishermen, 2000), and is indicative of a very strong bias against the industry which is very evident throughout the DEIS.

The DEIS section on the social impacts of timber harvesting (3-182) is very disorganized and confuses the direct impacts, indirect impacts, and substitute jobs. And even mixes these impacts up with revenue that timber harvesting generates for the Forest Service.

The most obvious fault of the DEIS is that it only looks at "planned sales" in the IRAs (3-184). This way of looking at the impacts does everything to minimize the negative economic impact. The DEIS does not explain that the "planned sales" are very low due to the 75% reduction in timber harvesting that occurred in this Administration, nor is it mentioned that few of the roadless areas had planned sales due to politics. Just because an area has been roadless and no sales were being planned does not mean that there is not potential to harvest timber in the future. The DEIS is remiss in not looking at broader and cumulative impacts. The DEIS should have looked at the total potential harvest of timber within the IRAs. But the DEIS does not even state how much of the IRA is timberland, nor was any effort made to determine the amount of timber in these areas.

Though the reviewer is not an economist, a couple of different ways will be presented to give a more realistic economic impact. This is being done to show that a realistic economic impact will show that timber harvesting should not be trivialized on National Forest lands and the economic impact of Alternative 2 is an order of magnitude greater than the DEIS indicates. (Professional Society, Park Falls, WI - #18662.93100)

In 1993, the administration's Northwest Forest Plan pronounced that the annual average output from the spotted owl region would not fall below 1.1 billion board feet annually (from 5 billion board feet in the 1980s). The actual output from the spotted owl forests is currently short of 200 million board feet, or 80 percent less than what the Administration committed to offer under the Plan. The lower accomplishment is partly the result of new policy direction and partly the result of continuing litigation. Given that experience, however, it is highly likely that the timber supply under the roadless area rule would be substantially less than the DEIS predicts. Using an analogous 80 percent fall-off assumption substantially increases the economic impact associated with the proposal. Instead of 3.1 billion board feet suggested by the DEIS, the timber program would produce just 600 million board feet annually. (Timber Association, Kalispell, MT - #53304.93300)

The fourth and fifth paragraphs on page 3-190 contain some of the most faulty logic one can imagine. The assumption that the proposed roadless area management strategy would, therefore, be beneficial to timber industry employees is ridiculous. This is akin to saying that if I were to allow the Forest Service to cut my arm off, presumably my quality of life would improve since I would no longer have to worry about hangnails. (Individual, Bend, OR - #735.93300)

Economic studies of the effect of this proposal will have on timber dependent communities should be considered and studies done on an individual basis and the losses that they incur should be taken into consideration. Contrary to the D.E.I.S the people I know in the timber industry are intelligent and responsible contributors to their communities. Middle class maybe! So what? Does being labeled middle class allow us any less consideration than other economic groups? I don't think so! (Individual, Eagle, ID - #8450.93100)

Many people who live in West Central Idaho feel betrayed by the Forest Service. Adams County, Idaho, which includes a good portion of the Payette N.F., has the highest unemployment rate in the entire interior Columbia River Basin according to F.S. figures in the recent Interior Columbia River Basin Ecosystem Management Project. Many of the people who live and work in Adams County depend on the local timber industry for employment. The Roadless Initiative will make matters worse. The socio-economic section of the DEIS is woefully inadequate and lacks site specifics. The timber volume scheduled for harvest that would be effected is slanted since these figures were taken after the forest's had time to adjust their harvest schedules to account for the 18 month road building moratorium. If you took the planned roadless area harvest from 4 years ago instead of this year's, the picture would be different. (Individual, McCall, ID - #7575.93710)

When I fly over a logged off area my first thought is of wondering how many schools, houses and churches were built with the lumber produced and how many kids got their college educations at least partially paid for by the wages of the loggers and the wages of the many others who serve that industry. (Individual, Ketchikan, AK - #11364.90000)

Public Concern: The Forest Service should institute more analysis of economic impacts on resource dependent communities. The proposal will result in a loss of jobs, mostly in small communities, and cause hardship for many families.

Your proposal would also result in the loss of jobs in many regions of the country. On the Payette alone the reduction of timber offered due to roadless areas will affect 125-150 jobs. These jobs are mostly in small communities and will cause hardship for many families. I think your analysis of economic impacts on communities is vastly understated. (Individual, McCall, ID - #6848.90010)

There is NO analysis of the effect of the proposal on communities with strong natural resource affiliation. No where in the DEIS can I find the findings and conclusions of the effects of the proposal on respective communities such as Jackson, Star Valley, Dubois, Wyoming or anywhere else for that matter. Such analysis is critical and a stated initial objective of the DEIS. The Summary DEIS, on page S-40 states that "There is not enough information available, however, to quantitatively estimate the degree to which jobs, income, and revenue would be reduced by the proposed rule." This type of analysis is unacceptable, and if proposed by a private entity would be shot down immediately. There is no acceptable reason that an analysis of the communities impacted can not and should not be done. This economic analysis is nothing less than one of the objectives of the DEIS and until done, no action should be taken. (Individual, Afton, WY - #13470.93700)

The sixth major issue cited was effects on communities with strong natural resource affiliations. I live in such a community, and there is no evidence here that anyone made any effort to study the effects in Seeley Lake, Montana. Reading the document, you find no tables or analyses of what those effects may be. (Individual, Seely Lake, MT - #10632.93100)

THE PROPOSED RULE PROPOSES TO ESTABLISH THE CRITERIA THAT MUST BE USED "THROUGH THE FOREST PLANNING PROCESS" TO PROTECT ROADLESS AREAS. THE SCOPE OF ANALYSIS OVERTLY EMPHASIZES BIOLOGICAL PROTECTIONS AND FAILS TO CONSIDER THE IMPACTS OF ROADLESS DESIGNATIONS ON SUSTAINABILITY OF AFFECTED COMMUNITIES, SCHOOL FUNDING AND FAMILIES THAT ARE DEPENDENT ON NATIONAL FORESTS FOR THEIR LIVELIHOODS. THE EIS ALTERNATIVES ANALYSIS SHOULD INCLUDE THE FOLLOWING:

*The report of the Committee of Scientists (COS) finds the less populated areas of the west will suffer substantial economic and social dislocations due to their low economic and social resiliency. Practically all of the communities in Southeast Alaska have such low resiliency. The further designation of roadless areas on national forests would be devastating to those living in that region. For the reasons described by the COS, the criteria for designating roadless areas must be expanded to include specific requirements that ensure school funding and jobs are protected and that the resources on the national forests will be available to maintain sustainable communities and families. Consequently, the alternatives analysis must include options that preclude roadless designation (both inventoried and un-inventoried) if the areas being considered have resources that would contribute to the economic and social welfare of nearby communities. Alternatives must include preclusion of roadless designations if the affected communities meet one or more of the following criteria:

1. Have a seasonally adjusted unemployment rate that is 5% above the average for the State.
2. Have an average per student expenditure that is less than the average per student expenditure for the State.
3. Have more than a 30% minority population.
4. Have a per-capita income that is less than 10% of the average per-capita income for the State.
5. Requires road access across roadless areas for community infrastructure including municipal drinking water supply, development of hydroelectric power sources and access to regional road and transportation systems.
6. If roadless areas are designated and, subsequently, the community fails to meet the above benchmarks, the roadless areas can be rescinded as a plan amendment. (Tribal, Juneau, AK - #44005.93700)

The economic impacts of the proposal have not been adequately addressed. The document assumes that both mining and logging are on the decline; therefore, economic impacts to rural communities will not be significant. (Individual, Paonia, CO - #11343.93100)

When economic impacts are analyzed on a county or multi-county regional basis, it is possible that very concentrated impacts on specific isolated communities may get "washed out" in the process of averaging over the

whole county or the whole region. As a result, we may get a more optimistic average picture that does not really reflect the reality that specific communities experience.

In general, it does not make economic sense to analyze a single small community as if it were a stand alone economy. For most small towns, those who live in the town may not actually work there, those who work in the town may not live in that town; those who shop in that town may neither work nor live in the town. We are a very mobile people who often do not live where we work or live where we shop. Our small cities are economically open to all those who commute to both work and shop. The only way to take into account all of that mobility and keep track of who works, shops, and lives where, is to define a relatively large functional economic area that contains within it most of that mobility and commuting and as a result, most of the economic links. A small city is rarely large enough to encompass all of those important economic connections; usually an entire county is not big enough either. That is why the US Bureau of Economic Analysis defines multi-county economic areas based on commuting patterns. (Environmental/Preservation Organization, Republic, WA - #16098.93700)

I also believe the economic estimates for the towns of Cower Marlinton & Webster Springs in West Virginia are underestimated & that many more jobs & funds for counties will be lost. (Individual, Lesage, WV - #17467.93100)

I am seriously troubled and offended by the proposed Roadless Area Conservation Rule and the Draft Environmental Impact Statement. My adult years since graduation from Oregon State College were spent as an employee of The Forest Service and the timber industry. During that time I spent considerable time dealing with Forest Service timber management and engineering personnel. I found these employees to generally be reasonable people dedicated to doing a good job managing National Forest lands and providing timber sales to sustain local sawmills and their dependent communities. Implementation of this ill conceived proposal may lead citizens of these communities to view the Forest Service as their enemy. Mill closures and resulting unemployment due to vast stands of Forest Service timber being unavailable, will be hard to accept when abundant Forest Service timber surrounds these communities. Damage to local tax bases will be catastrophic. (Individual, Kooskia, ID - #6765.93700)

GOVERNMENT REGULATORY SCHEMES MUST NOT IMPAIR VETERANS EMPLOYMENT OPPORTUNITIES AND THEIR RIGHT TO CHOOSE THE PLACES THEY PREFER TO LIVE.

Veterans, like everyone else, must work to support themselves and their families. Any government regulatory program that interferes with or shuts down established industries, businesses and other sources of veteran employment is contrary to the interests of working veterans. Moreover, government public land programs that shut down job-creating industries, force veterans and their families to move and deny them their preferred lifestyle are absolutely contrary to the interests of working veterans. Management of government public lands must be done in such a way as not to deprive veterans of their livelihood nor their choice of a place to live. (State Agency, Casper, WY - #16281.93710)

The DEIS does not adequately address the impact of this prohibition on the livestock permittees and leases and local communities in and around national forests. The DEIS should conform to the Council on Environmental Quality National Environmental Policy Act regulations, which require comprehensive, detailed analyses of the listed factors (ecological, aesthetic, historic, cultural, economic, social, and health), and should not only identify the economic impacts (direct, indirect, and cumulative), of all the alternatives, but it should also quantify these impacts. (State Agency, Las Cruces, NM - #17264.90010)

MAINTAIN STATUS QUO SO THERE WILL NOT BE ADVERSE ECONOMIC CONSEQUENCES

My recommendation on the roadless area conservation proposed rule is TAKE NO ACTION. We live in an area highly dependent on the natural resources of the area and in changing the plan we would suffer huge economic consequences in our community. Things have been going pretty darn well under the current guideline, don't mess up what is working well for us. (Individual, Orofino, ID - #8130.61100)

Public Concern: The Forest Service should consider the impacts on jobs indirectly related to the timber industry.

In the table on page 3-213 it shows that there is no operating sawmill in Gunnison or Wellington, Utah. This is not true. There are operating sawmills in both of these places. On page 3-218 it states that the direct jobs that will be affected in Gunnison and Wellington is 17-28. There are far more than this at the sawmill in Gunnison alone. There are also related jobs that are affected if the sawmill in Gunnison is not able to operate. These may be considered indirectly affected, but they are still someone's job, and this area isn't known for its abundance of jobs. There are at least 1000 families in the turkey business in our county (Sanpete, Utah) that would be financially affected by the cessation of the sawmill in Gunnison. These turkey farmers use the shavings from the sawmill as bedding in the turkey sheds. This benefits both the farmer and the sawmill. The cost of getting these locally is about 1/2 of what it was previously. These jobs need to be taken into account, too. (Individual, Manti, UT - #26036.93100)

We in the Railroad Industry depend heavily on the Timber Industry. (Individual, Missoula, MT - #11587.93720)

In addition, closely-allied industry sectors that are expected to suffer adverse economic consequences, should the Proposed Rule be finalized, are virtually ignored for the most trivial of reasons. (Timber Association, Beaverton, OR - #52230.93200)

Public Concern: The Forest Service should recognize that the proposed rule will have minimal impacts on timber dependent communities.

Another concern of the Proposed Roadless Policy is it will adversely affect the timber supply and timber dependent communities. However, prohibiting timber harvesting from roadless areas will affect only 7% of the timber supply from Forest Service lands (S-18 & S-37), which in turn is a very small percentage of the total timber supply for the United States. The Roadless Policy would eliminate the cost of reconstruction of 806 miles of roads, thereby eliminating substantial expense. It is well known and stated in Forest Service documents that many timber sales are sold below cost because of road construction expense. Therefore, prohibiting timber harvest in roadless areas would have a negligible impact on the budget and will decrease the Forest Service timber supply by only 7% (S-37). In fact, the impact on total U.S. timber production, of which less than 5% currently comes from national forest land, would be a minuscule, less than 1/2 of 1%. Since the Forest Service proposes only "restoration harvesting" to increase forest health, the cost of timber harvesting would be much greater than normal commercial harvesting in already roaded areas. (Environmental/Preservation Organization, Seattle, WA - #10788.93340)

I would like to point out some myths and facts of logging our National Forests as my Comments on National Forest Roadless Initiative. They are as follows:

MYTH: SOME COMMUNITIES RELY EXCLUSIVELY UPON NATIONAL FOREST TIMBER SUPPLIES.

FACT: There simply are no communities dependent on National Forest logging. In the states with the most federal commercial timberland, logging and wood products employment represents a minor share of overall jobs and income. Most communities near our National Forests rely instead on the many uses and values associated with unlogged forests. In Alaska, for example, jobs related to environmental quality outnumber wood products jobs by a ratio of 16:1. According to the U.S. Forest Service, 74% of the jobs in National Forests are related to recreation, hunting and fishing, whereas, only 3% are related to logging.

Economic transition in communities that once received large amounts of federal timber has already occurred. Between 1988 and 1999, the amount of timber logged from National Forests dropped by 75%, from over 12 billion board feet to about 3 billion board feet. This drastic decline has already spurred economic transition in rural communities near our National Forests. Restoring the damage caused by a century of logging will provide additional long-term employment opportunities. The National Forest Protection and Restoration Act (HR 1396) addresses the long-term health of National Forests and surrounding communities by redirecting the timber subsidy to create a scientifically-based ecological restoration program for National Forests. (Individual, Bradford, PA - #7842.93700)

Public Concern: The Forest Service should not use Rural Development funding to mitigate impacts of the proposed rule.

The only mitigation identified in the Draft EIS is to use Rural Development funding to off-set impacts to affected communities. However, using any form of Rural Development funding to mitigate impacts of the "Proposed Action" would create an inequitable balance among communities. For example, many of these dollars are allocated to communities for proactive rural development projects. Now the Forest Service comes along, makes an unpopular decision that will affect communities, and proposes to take funding from proactive communities to mitigate impacts. This is nothing more than "Stealing from Peter to pay Paul." There is no new money to offset the disclosed and undisclosed impacts from the "Proposed Action." Therefore, communities that are currently using this funding to diversify their economy, attract new businesses, or strengthen their resiliency will find themselves stripped of resources while attempting to be proactive. (County Elected Official, Sheridan, WY - #16187.93621)

Public Concern: The argument that forest products companies need to turn to value added timber is not justified inasmuch as trees are required to produce value added products.

Ketchikan Pulp Mill was shut down due to a combination of lawsuits and a lack of timber. Gateway Forest Products is trying to make another value added industry in veneers. Currently they can't get enough timber. what do they call these sawmills in Wrangell and Petersburg and Thorn Bay that are currently closed due to a lack of timber? It's value added. I hear again and again how we need to go to value added. How we need to stop cutting trees. How to make do with fewer trees. It will not work. Trees are required for value added. (Individual, Ketchikan, AK - #23866.93700)

Public Concern: The Forest Service should analyze the effects of the proposed rule on timber prices and housing construction costs.

It [the Roadless Rule] should boost timber prices nation-wide which are sliding down. (Individual, Meridian, MS - #7054.93340)

As we Americans keep moving into larger and larger homes, I wonder where the wood is to come from to build them? If from overseas, that only adds to the imbalance in trade. And with the continued reduction in timber harvests on national forests from the little ground left for timber production, one must wonder at the inflation impact. (Individual, Albany, OR - #5675.93000)

If the present Clinton-Gore scheme is continued, we will have more devastating fires, further depression of lumbering economies, and ever higher priced building materials--putting the purchase of new homes further out of the reach of working people. (Individual, No Address - #5150.90100)

I would like to share with you the reasons that I feel the proposed roadless area rule is not good for our nation: It pushes up the price of wood products which makes homes more costly, which puts them out of the price range of the next generation. I fear that for our children. (Individual, Marion, MT - #6315.92300)

Public Concern: The Forest Service should address the cumulative effects of the recently proposed rulemaking initiatives on small businesses.

The viability of small businesses in the natural resource industries and the rural resource dependent communities is seriously threatened by this proposal. The Forest Service appears to be on a mission to turn our National Forest lands into museum dioramas without natural resource production and with few human visitors. In recent months, President Clinton and the Forest Service have announced numerous major rulemaking initiatives and large-scale

plan amendments, in addition to the proposed rule on roadless areas. These include efforts to revise forest planning regulations, the development of a national road management policy, a new policy on watershed approaches to land management, together with regional planning efforts for the Interior Columbia Basin and the Sierra Nevadas. Each of these new initiatives is, in itself, damaging to small businesses and the economic health of rural communities. Taken together, the impact is devastating and will result in the demise of numerous small businesses and untold hardships on rural, resource-dependent communities. (Mining Association, Spokane, WA - #14725.72100)

And I was quite surprised to note that a Report on the impact of this policy on small business was deemed "unnecessary" simply because the Forest Service does not keep track of the size of businesses it deals with. (Recreational Organization, Huntsville, AL - #10130.93100)

The Agency will suggest a macro analysis which shows that other land owners may supply timber to the market to replace lost Forest Service timber and will suggest that small business will not be impacted by reduced federal timber sale programs because they will have access to alternative sources. They will also suggest that Canada will make up lost timber so that the impacts of their draconian policy proposal will not ripple through the home building industry.

RESPONSE - Such an analysis must be completed on a county by county basis to truly understand if alternative sources of timber are available. It must also analyze at what price the alternative timber supplies will become available. Then the Agency would have to identify individual mills that are not likely to survive and assess the overall impact of each mill on the community and county it is located in. In States where the Forest Service is the majority supplier of timber such analysis is critical.

The SBA and Congress should understand that the current Canadian Lumber Agreement, which runs through March of 2001, precludes large amounts of Canadian Lumber flowing into this country to replace lost Forest Service volumes. The penalties imposed on extra volumes from Canada are significant.

Thus, the Forest Service...macro analysis proposed in the Advance Notice of Rule Making is sophomoric at best, and down-right evasive and illegal at worst. (Timber Association, Beaverton, OR - #52230.93100)

7.2.2.1 Jobs and Employment

Public Concern: The Forest Service should reevaluate its analysis and projections regarding employment in the timber industry and forest dependent communities.

Your briefing draft references several studies that support the hypothesis that job loss for rural forest workers will have no consequences as long as the losses are constant. These studies show a lack of basic understanding of forest communities. Many of the people I have shown the statement to have commented that the studies do not reflect the industry as it is today, but perhaps how it was fifty or sixty years ago. The study done in 1998 said to reflect social patterns of forest communities could have reached those conclusions because of the decline in harvest on federal lands in the Pacific Northwest. Also absent from the draft are any studies that show regional differences. One report from Great Lakes Forestry Alliance outlines the positive effect the forest industry has on local infrastructure and other industries such as tourism. These types of alternate opinions are notably absent from your report. (Timber Company/Association, Rhinelander, WI - #1718.44450)

Using the figures of the Timber Sales Program Information and Reporting System TSPIRS (the calculations provided by the Forest Service), of 17 jobs affected for each million board foot reduction, the impact is calculated to be 354 jobs in Utah. The statement on page 3-221 of the draft EIS identifies only 119 jobs affected on two forests in Utah and two Idaho forests. Again, using the TSPIRS figure, the impact would be 490 jobs for the Caribou, Payette, Dixie and Manti-LaSal National Forests. The draft EIS is carefully worded to direct attention away from a state-by-state analysis by including data from two or more states and arranging the combinations of forests to disguise the real impact. In other instances, the figures are erroneously calculated to reduce the apparent impact of the selected and other alternatives. (State Elected Official, Salt Lake City, UT - #43918.90010)

The DEIS slams timber-dependent communities as being the least prosperous of rural communities and then faults forest workers for taking high paying forestry jobs. The Forest Service needs to accept part of the blame for declining prosperity in timber-dependent communities. Timber harvesting on National Forest lands has declined from 11 BBF in 1987 to 2.2 BBF in 1999. Apparently, the Forest Service has all but abandoned its commitment to community stability. Rather than offering people jobs to help manage a renewable resource, the Forest Service offers short-term owl mitigation funds. Rather than returning revenues to local communities derived from the sale of renewable resources, the Forest Service seeks congressional appropriations. (State Elected Officials, Pierre, SD - #17293.93700)

Concerning your loss of jobs numbers. You say, "there will be 538 jobs lost; \$25 million dollars in revenue." I say you have underestimated the loss. What about the jobs related to the timber industry, grocery stores, clothing stores, car dealerships, restaurants, etc.? The \$25 million dollar figure should be tripled at least. (Individual, Springville, CA - #2059.93700)

While many workers WOULD in fact jump to alternative equivalent work, "if available," the bare fact is that alternative work is often NOT available in local communities. The Forest Service needs to face this reality by conducting an honest cultural and sociological impact analysis -- not on a regional or national basis, but locally. (Individual, Whitefish, MT - #30417.93100)

Declaring multiple use lands roadless will be devastating to a lot of western communities relying on timber. Already sawmills have shut down on the Flathead in northwestern Montana. Northern Idaho and parts of Washington State are solely supported by the timber industry. (Individual, Sheridan, WY - #3513.93700)

The agency necessarily must conduct local evaluations for each roadless area and national forest. To demonstrate the errant agency assessment contained in the DEIS, we provide the following example from the Sky Lakes B Roadless Area in the Winema National Forest, Oregon, where the proposed Pelican Butte Ski Area (EIS completed) would be prohibited by DEIS. Because of insufficient time available during this abrupt public comment period, and because adequate data is not available from the Forest Service for all roadless areas, we are only able to provide this small demonstration of the wholesale error in the agency's superficial nationwide assessment. If there were more time to complete additional assessments, we would no doubt find that the DEIS failed to adequately evaluate the consequences of the proposed prohibition on most other roadless areas across the nation. SKY LAKES B ROADLESS AREA, WINEMA NATIONAL FOREST, OREGON. Evaluation Criteria (Selected from Table S-4. Summary of Combined Effects of the Proposed Action): TIMBER-RELATED EMPLOYMENT DEIS says only 250 jobs forgone nationwide (DEIS ignores all other-related employment) Winema Forest Plan/Pelican Butte EIS: 8 million harvest would generate 128 jobs for one year in Klamath and neighboring counties; ski area development would generate approx. 200 jobs during a construction year, and approx. 200-400 direct, indirect and derived jobs per equivalent year thereafter (all jobs forgone by DEIS) (Timber Industry or Association, Eugene, OR - #15879.7000)

The National Forests of Washington are the source of only a very small part of the total timber harvested. The ICBEMP Supplemental Draft EIS estimated the direct employment associated with National Forest timber harvests in eastern Washington "non-owl" forests to be about 400....Adding in the employment associated with eastern Washington "owl" forest brings this to about 650....Total employment in eastern Washington in 1997 was 692,000....So the total direct employment associated with the entire federal harvest represented less than one-tenth of one percent of all jobs. Because of the relatively low employment associated with National Forest harvests, changes in that harvest can be expected to have only a very small impact on the local and state economies....Interior Columbia Basin Supplemental Draft Environmental Statement, Volume 1, p.159, Table 4-44, March 2000....See the discussion in Chapter 2, Section D....Employment covered by unemployment insurance in 1998 was 535,000. Total employment includes the self-employed, those working for very small businesses, and a few other types of jobs not covered by the unemployment insurance program. The advantage of covered employment is that it is based on actual reports by firms. Total employment has to be estimated based on survey data. (Environmental/Preservation Organization, Republic, WA - #16098.)

Rural unemployment in southern Oregon is the highest rate, 7.2% (May 2000) of any region of the state. What affects will this Draft EIS, as proposed, have on this rate of unemployment. (Timber Company or Association, Medford, OR - #13658.93710)

In passing, I suggest a review of some of the facts presented in the DEIS. In Table S-1, under Alt.1, 16,500 MMBF (3,300 MMBF yearly) supports 27,000 jobs, or about 8 jobs per MMBF. Alt. 2 reduces the cut by 160 MMBF, and yet jobs are only reduced by 530, a ratio of 3.3 jobs per MMBF. Is this a deliberate effort to understate the effect of the proposed rules? Income to the States is treated in the same manner. A 4.8% reduction in production results in only a 1.9% reduction in payments. (Individual, Tigard, OR - #9199.93710)

I find it convenient that the report fails to state, in detail, how the estimations were made and what methodologies were used by the drafters. It is impossible to question something withheld from review and scrutiny by those holding the information. What assumptions were made to determine the number of direct jobs? The report does not even define what a direct job is. (County Agency, Richfield, UT - #17283.93100)

TECHNOLOGICAL ADVANCEMENTS IN HARVEST TECHNIQUES ACCOUNT FOR JOB LOSS IN THE TIMBER INDUSTRY

The real enemy of the logger is the logging corporation. The timber industry is no friend of labor, they have increased mechanization to the point where it takes 2 men to do what 20 used to do, and would do away with employees altogether if they could build good enough robots. The fact is, this fight is not between environmentalists and the working class, it is between the majority of the American public and corporations who like to keep exploiting for themselves land that belongs to everyone. (Environmental/Preservation Organization, No Address - #1826.93710)

FOREIGN EXPORT OF TIMBER ACCOUNTS FOR JOB LOSS IN THE TIMBER INDUSTRY

One other issue that is sensitive to us is the sale of logs overseas, especially to Japan. This is a national natural resource that is leaving our country at the expense of American jobs being lost at local sawmills. Let's send our logs to our lumber mills. (Individual, No Address - #6950.93300)

Export of whole logs and logs trimmed into cants is export of jobs. It is wrong and should be stopped. There is very little trickle-down coming this way from Japanese stock markets. (Individual, Ward Cove, AK - #6821.93800)

CYCLICAL FLUCTUATIONS IN THE DEMAND FOR FOREST PRODUCTS CAN ACCOUNT FOR JOB LOSSES AND MILL CLOSURES

Reduced employment in forest products and unemployment in "lumber towns" in Washington are usually discussed entirely in terms of the way limitations on National Forest timber supply are assumed to be limiting production. That is somewhat startling because until very recently it was widely recognized that cyclical fluctuations in the demand for forest products were the most likely source of layoffs and mill closures. As the American economy has gone through periodic recessions and as residential housing starts fluctuated, the demand for wood products also fluctuated, as did employment. (Environmental/Preservation Organization, Seattle, WA - #26896.71220)

Public Concern: Timber workers and communities should adapt to a changing job market.

In the section on Forest Dependent Communities, 3-209 to 3-220, I did not notice any attempt to suggest that the forest products laboratories might work to determine value added options for communities within a moneyshed ... The prospect of greater income from a small volume of timber might be something that would help encourage acceptance of a lower timber harvest and should be well within the mission and scope of the agency and the compassion of its staff. (Individual, Chesapeake, OH - #30421.93644)

Yes, wood products are wonderful, but it is time to move on. The steam engine also was wonderful, and is now obsolete. What happened to the families whose income came from [that] industry? Or the families whose mainstay came from the eight-track tape industry? I am certain they moved on as the world changed. Timber workers too will adapt...If the timber industry is weakened, another will be strengthened and will need strong bodies? What about the steel industry, or recycled products. (Individual, Missoula, MT - #5687.93700)

There are so many possible alternatives to utilizing the resources in these areas that it makes sense to create jobs refining and using new sources of raw material and transition away from non-sustainable methods currently employed. (Individual, Eugene, OR - #5338.93341)

The roadless area proposal should go beyond discussing the mitigation of negative social and economic impacts of reduced road construction and timber output. It should link to some of the creative initiatives that the Administration and Forest Service have recently engaged in to help build the capacity of communities to become stronger partners in implementing ecosystem management on the national forests. A clear sense of partnership with communities is central in the agency's move toward collaborative stewardship. Initiatives that could help strengthen the capacity of communities to be partners in ecosystem management and make the transition to a restoration-based economy include:

- Innovative contracting mechanisms being tested through stewardship contracting pilots-mechanisms that promote skill training, quality performances on the land, and quality jobs in rural communities.
- Efforts to direct more funding toward restoration work on the national forests and to create private-sector jobs in rural communities, such as those being explored in the Administration's Healthy, Investments in Rural Environments initiative.

It is important for the Forest Service to discuss these types of linkages in the roadless proposal so that communities understand the opportunities that may be created and policy makers understand the types of investments and policy changes that will be needed in order to make viable collaborative stewardship and a restoration-based economy. The agency also needs to discuss the importance of monitoring and learning through these initiatives. We believe that innovative multi-party monitoring should be included as a mechanism to ensure that the ecological, social, and economic effects of these initiatives are being tracked and that the information is transparent and openly shared, locally, regionally, and nationally. (Environmental/Preservation Organization, Washington, DC - #29749.90000)

Miners in north Idaho voiced their arguments to keep the mines open, arguing for the generations of miners in their family and future generation that will follow. And the mines were kept open, until the bottom fell out of the market, or until the resources were exhausted. Those miners moved on. Many came here to Arizona, where they worked until their employers closed their mines. This, too, will happen with logging. Though individual loggers will oppose any regulation affecting their trade, they will eventually lose their jobs. Their employers will find new ways to increase their profits by reducing expenses. The industry will direct the blame at the government, citing an environmental regulation. They have demonstrated this by exporting logs to overseas mills. This activity closed many mills in the Olympic Peninsula, though the laborer blamed the spotted owl rather than accept their employer's disloyalty. People adapt. Those intelligent enough to realize that the logging industry is slowly dying will learn to seek another career, and prepare their children for a life outside of logging. These families will persevere. Those who fail to adapt will complain, and will be supported by the very government which they oppose. (Local Community Organization, Grangeville, ID - #11908.71200)

Community adaptability, resiliency and diversity. New concepts are being investigated to replace traditional notions of community stability. The common theme is a community's ability to adapt to a change, and may be a more useful concept in assessing which communities will thrive in our rapidly changing world. Levels of human capital, the imagination of community leaders, the ability to access information, and the availability of a flexible, diverse resource base are variables that will likely affect community adaptability. Community resiliency, the ability to successfully deal with the inevitable, multiple social and economic changes that are evident in our society, is a primary indicator of a community's health and vitality. Resiliency is a function of population size, economic diversity, attractiveness and surrounding amenities, strong leadership, and other factors such as community residents' ability to work together and be proactive toward change. Population growth is usually associated with economic growth and vice versa, but not always. A community can experience "boom and bust." The presence of desirable environmental amenities, and especially the types supplied by public lands, can contribute to an area's sustainable population and economic growth. A resilient community, unless it is both small and isolated, is unlikely to be substantially affected by Forest Service land use decisions. Economic diversity is considered an important component of economic resiliency. A diverse system (whether economic or biological) is better able to absorb and rebound from changing conditions than a less diverse one. (Environmental/Preservation Organization, Seattle, WA - #26896.93700)

ROADLESS AREAS ATTRACT A HIGHLY MOTIVATED, WELL-EDUCATED WORK FORCE, AND PROVIDE NEW AND INNOVATIVE TECHNOLOGICAL AND COMMUNICATION BASED JOBS

The second issue is economics. Senator Max Baucus recently hosted a major economic summit in Great Falls, dealing with Montana's struggling financial times. One of the major findings of this summit was that Montana is blessed with a highly motivated, well-educated work force. It was argued that this pool of talented workers provides the base for drawing new high-tech and innovative jobs to our state. The new economy is one based on technology and communications. We can do these jobs from anywhere. We chose to do them here because of the undeveloped nature of the country. The main reason people are in this great state is because of the quality of life and natural surroundings. We live in Montana because of the wild places. We need to keep them wild. By keeping the road-less areas road-less we do support a strong Montana economy. (Individual, Missoula, MT - #10557.90220)

UNEMPLOYMENT IS AT AN ALL TIME LOW AND WORKERS CAN EASILY RELOCATE

Unemployment is at all time low, and workers can easily relocate. (Individual, Meridian, ID - #9777.93710)

TOURISM MAY OCCUR ONLY SEASONALLY OR AT SPECIFIC TIMES OF THE YEAR IN SOME AREAS OF THE COUNTRY AND COMMUNITIES RELY ON YEAR ROUND INCOME TO SURVIVE ECONOMICALLY

They like to talk tourism as a savior of southeast Alaska. Five months of tourism does not pay 12 months of mortgages, groceries, staff, whatever you want to try to spend your money on. We need year round sustainable income. We need sustainable timber. We need the same opportunity to responsibly harvest our natural resources as the other states in the United States are given the opportunity to harvest their resources, albeit mining, et cetera. (Individual, Ward Cove, AK - #23581.93200)

THE FOREST SERVICE SHOULD NOT ATTEMPT TO COUNTERACT THE MACROECONOMIC FORCES CAUSING MOST JOB LOSS IN THE TIMBER INDUSTRY WITH FEDERAL TIMBER FLOW POLICIES

The Forest Service cannot hope to control the destiny of rural communities. The timber industry inherently booms and busts. The Forest Service should allocate the National Forest to their highest and best use by protecting them for multiple benefits: clean drinking water, protecting habitat for native species (including threatened and endangered species), carbon sequestration, and public recreation. This is completely consistent with multiple-use and with the will of the majority of American people. Macroeconomic forces and associated changes in the timber industry probably influenced rural communities more than the Forest Service could with even flow policies. Today, with NFS harvest levels at a fraction of earlier levels, the ability of federal land managers to offset economic cycles with even flow of timber volume has been greatly reduced. Even if current managers could provide an even flow of timber sale volume, the industry has changed to such an extent that it can no longer be assumed that local mills will be the successful bidder for agency timbers sales, nor that local communities will receive logging and processing jobs as a result of those sales. In today's market, the destination of federal timber is generally unpredictable as processors reach far to supply their mills. Log sorting yards and high efficiency mills disperse logs differently; directing logs to their most profitable use. These conditions undermine confidence that federal timber supply policy is capable of supporting jobs in specific communities. DEIS page 3-120. (Environmental/Preservation Organization, Eugene, OR - #55101.21100)

THE FOREST SERVICE SHOULD HELP DISPLACED TIMBER WORKERS AND COMMUNITIES FINANCIALLY WITH RELOCATION, EDUCATION, EMPLOYMENT, AND/OR COMPENSATION

I believe that if people whose livelihood depends upon the forest or other public lands and if that means of making a living for them and their dependents is taken away, they should be financially supported by helping them to relocate and...to go to school to change their vocation, but with a limit of three to five years, depending on their schooling needs. (Individual, No Address - #2416.93710)

It is also important to create a program which retrains those employed in these industries, for instance loggers, so as to prevent as much damage as possible to those workers and their families. It is difficult (I am undertaking), to change one's way of life but we cannot continue to use our resources as we have or we will find ourselves without. (Individual, Houston, TX - #7043.93170)

Seek funds for reemploying forest workers in these communities restoring forest health and transition to other employment. (Individual, Portland, OR - #5337.93710)

The negative effect of displaced forest workers could be made a positive one by utilizing their skills to reclaim the hundreds of thousands of miles of failing road bed. (Individual, Seattle, WA - #10833.93000)

There is the appearance that individuals are being left out while states and counties may be protected against a loss in income from reduced federal forest operations. I think that individuals would feel better about the proposed new policy if compensation to affected individuals was assured. Of course, the individual would have to show actual loss, not some intangible, psychic loss. (Individual, White Pine, MI - #9227.93700)

I suggest the Forest take some of the \$250 million they would save by not building roads and infuse it into the local communities affected by the roadless plan. Monies could be used for value-added industries in wood products and in job retraining for timber workers. (Individual, Helena, MT - #10486.93720)

The Board of County Commissioners request your consideration that any lands in Dolores County that are declared a National Monument, roadless, or wilderness study area or any area taken out of production for any reason receive payment at a rate of \$2.00 per acre per year tied to inflation in future years.

Of a total of 689,285 acres within Dolores County 422,240 are Federal Public Land and 3,520 are State Public Land. This represents a tremendous amount of acreage removed from production of mining, timber industry, utilities that are direct revenue to the County.

We understand balanced budgets (better than most Congressmen), but this is not a pork barrel project but survival for rural counties. (County Elected Officials, Dove Creek, CO - #6381.93700)

Why does the proposal not discuss a mechanism for reimbursing these local communities for the considerable revenue that would be lost from implementation of such a proposal? (Range/Grazing Organization, Olympia, WA - #28669.93200)

THE SUGGESTION THAT A GOVERNMENT PAYMENT CAN BE MADE TO AREAS NEGATIVELY IMPACTED BY THE LOSS OF TIMBER HARVEST REVENUE IS NOT ACCEPTABLE

You make a statement that a government payment can be made to the areas that will be hit hard by the loss of logging revenue. Are you recommending another welfare state? This is "reasonable?" I think not. (Individual, Springville, CA - #2059.93340)

Public Concern: The Forest Service used biased methodologies to assess the impacts of the proposed rule inasmuch as it failed to include job losses created by conservation policies and politically motivated actions over the past 10 years.

Furthermore, I find the methodology of addressing impacts of the proposed action biased. For example, the Forest Service is willing to use at best flawed roadless inventories conducted some twenty plus years ago to expand its proposed action. Nevertheless, in the timber harvest section (page 3-183) the EIS uses current job and income studies which fail to taken into consideration the direct and indirect jobs and income that have been lost in the past decade since Forest Service officials began implementing conservation policies under the current political administration. These jobs were not lost do to the demands of the American people, but instead they were lost due to the political motivations. (Individual, Afton, WY - #10615.7000)

Public Concern: The Forest Service should address the socio-economic impacts of the proposed rule on outfitters and guides working in roadless areas.

I would like to point out that the EIS socio-economics study does not include the impact on outfitters and guides who work in roadless areas. There are over 270 businesses in Montana that rely on roadless national forest lands, and that should be altered in the final. (Environmental/Preservation Organization, Helena, MT - #11157.90010)

The socioeconomic analysis is too narrowly focused on timber and fails to account for other small outfitting and guide businesses which operate in roadless National Forest lands. (Environmental/Preservation Organization, No Address - #18652.93100)

The outfitting industry has long encompassed more than traditional horse-packing and hunting trips. However, increased interest in outdoors recreation and the need for outfitters to generate income during the "off" season has led to an apparent increase in the amount of non-hunting outfitting use of national forests, and to a significant number of one-day backcountry trips. (Environmental/Preservation Organization, Helena, MT - #53501.91300)

When economists calculate the economic impact of industries, they often look for the amount of money brought into a community from another location. In other words, although nearly 9,000 Mountains employed outfitters in state, economists assume that this money would have remained in Montana regardless of the outfitters' activities. The expenditures of nonresidents, however, represent "new" dollars, and fuel the economy. Thus, to learn the economic impact of wildlands outfitters in Montana economists attempt to identify the expenditures of nonresident visitors on everything from taxidermy to hotel rooms. Using this information, we estimate that in 1998:

Nonresident hunters outfitted with wildlands outfitters spend 7.4 days in Montana per hunting trip, and spent \$143 per day on food, lodging and other expenses.

The average nonresident outfitted hunter purchased a game license for approximately \$722.19.

The average Montana hunting client paid wildland outfitters \$1,728.

Surveyed outfitters reported that 87.2% of their clients, on average, are from out of state.

Nonresident outfitted hunters spend \$29 million in Montana in 1998. (Environmental/Preservation Organization, Helena, MT - #53501.91400)

Public Concern: The Forest Service should consider the effects of the proposed rule on potential job loss for Forest Service employees.

Consider the impact of job loss as well for the Forest Service employees. (Individual, Moses Lake, WA - #7991.71230)

The DEIS has made no attempt to analyze the impact of Alternative 2, 3, or 4 on Forest Service employment levels. But if the resulting impacts cause a 5% reduction in timber and recreation use, and that is reflected in a 5% reduction in Forest Service jobs, that would be a 1500 reduction in the number of Forest Service employees. Is that accurate?—no analysis was done. (University or Professional Society, No Address - #51576.93710)

The Forest Service Council represents employees from all branches and levels of this agency--from wilderness rangers, to timber markers, to economists. The Forest Service Council is proud to be working in Partnership Councils where working conditions and employment impacts are discussed with the Administration. Unfortunately, the Forest Service Council was not informed of, nor were we part of, any discussion on this large, percussive issue. We did not know about it until we read about it in the newspapers. We have still not been approached by the administration to discuss the potential impacts of this proposal on our lives.

Forest Service employees have already been devastated by downsizing. Reduction in force (RIFs) occurred as a result of the Spotted Owl shutdowns in Oregon and Washington, and the downsizing hasn't stopped there. Forests around the country continue to have their work force ransacked. This is particularly frustrating when we see the enormous growth in size and power of the Washington Office. We do not know the full impact this latest proposal will have on our remaining work force. But certainly hundreds, and possibly thousands, of jobs could be eliminated, and another RIF could possibly result. (Professional Society, Park Falls, WI - #43991.90010)

7.2.2.2 Economic Impacts and the Tongass National Forest

Public Concern: The Forest Service should consider the economic impacts of including the Tongass National Forest in the proposed rule.

ROADLESS PROTECTION WOULD HURT SOUTHEAST ALASKA'S ECONOMY

The designation of roadless areas on the Tongass National Forest would seriously impact Alaska's economy. First, it would send a message to the business community that a business venture based on National Forest policy can not be counted on and therefore is a poor business risk. Second, the roadless designation permanently restricts businesses from growing, be they recreation, mining or timber harvesting. Finally, I am told that 2/3 of the promised timber harvest already planned for the Tongass over the next five years will be eliminated. The USFS touts to the private sector the development of primary processing facilities to utilize the Tongass timber. What businessperson is going to invest in a forest product processing facility with such an unpredictable raw material supplier? Obviously no one, and equally obvious are the Forest Service's conflicting policies. (Timber Company or Association, Anchorage, AK - #6359.93200)

While the impact of the Roadless Plan may be minimal when the total U.S. production is considered, it is important to note that the Forest Service's drastic reductions in its timber sale program over the past decade have already devastated communities surrounding our national forests. If the Tongass is included in the Roadless Proposal, however, 2/3rds of the planned timber harvest in the next five years will be eliminated under this Roadless Plan which will destroy the struggling, small forest products industry that remains. (Business/Business Association, Anchorage, AK - #7612.93200)

ROADLESS PROTECTION WOULD BENEFIT BOTH SOUTHEAST ALASKA'S ECONOMY AND THE NATIONAL ECONOMY

The economy of Southeast Alaska is well along in a transition away from its historic dependence on timber. In 1999, the forest products industry produced just 3.4% of all jobs in Southeast Alaska, down from 13% in 1975. While timber employment has diminished considerably in recent years, the rest of the regional economy has grown. Between 1988 and 1997, total employment in the region grew by nearly 25%, exceeding the national average. Recreation and tourism have been particularly vibrant, as indicated by increases of 46% in retail trade and 48% in services between 1985 and 1995. A ban on roadless area logging would potentially decrease total employment in the region by just eight-tenths of 1%, a reduction that, over time, would be more than offset by job growth in other sectors. The Tongass National Forest, with its dramatic and undisturbed landscapes, provides most of the region's recreational and tourism opportunities and natural amenities. Accordingly, preserving the Tongass roadless areas is essential to the economic well being of Southeast Alaska. (Environmental/Preservation Organization, Missoula, MT - #43982.93000)

A prohibition on all logging in roadless areas, including those in the Tongass, would result in only a 7% reduction in the Forest Service's planned timber sale program. The impact on total U.S. timber production would be miniscule. And the complete coverage of the Tongass National Forest in the final rule would save the American taxpayer about \$96 million over the next 5 years in total net loss to the government from the timber program. (Individual, Nashville, TN - #6417.93300)

The costs of logging in the Tongass exceed timber sale revenues by an average of \$178 per thousand board feet. The Forest Service plans to sell 540 million board feet of timber in Tongass roadless areas in the next five years, in order to support 300 timber industry jobs in southeast Alaska. That means exempting the Tongass from roadless area protection policy will cost American taxpayers \$64,400 per timber job. Timber extraction is simply not the best use of roadless areas in the Tongass. (Individual, Seattle, WA - #10687.93600)

Public Concern: The Forest Service should consider that by delaying decisions on the status of the Tongass until 2004 it effectively precludes any new timber industry ventures in the Tongass.

By placing the Tongass NF into a review category in 2004, the government is effectively closing the door on any opportunities to create a viable industry for the benefit of many communities. No company can be expected to pursue opportunities if there is a real risk that stumpage volume will not be available in as little as a few years. (Tribal Corporation, Juneau, AK - #44005.93000)

BY DELAYING A DECISION ON THE EXCLUSION OR INCLUSION OF THE TONGASS UNTIL 2004, THE FOREST SERVICE WILL STOP ALL INVESTMENT IN NEW MANUFACTURING CAUSED BY UNCERTAINTY IN THE FUTURE TIMBER SUPPLY. Delaying a review of the Tongass National Forest for inclusion effective 2004 is self-fulfilling in terms of assuring that demand for Forest Service timber will continue to diminish. The forest products industry is actively reconfiguring itself to utilize Forest Service timber from the Tongass National Forest at current supply levels. Active projects include veneer mills, ethanol manufacturing from wood wastes, and sawmill reconfiguration to fully utilize timber expected to be offered in stumpage sales. (Tribal, Juneau, AK - #44005.93300)

Public Concern: The Forest Service should consider the effects the proposed rule will have on surface transportation options in Alaska.

[PVOA supports] TONGASS NATIONAL FOREST ALTERNATIVE T1

The DEIS states on 3-227 in regards to the Tongass NF, "THE UNDEVELOPED CHARACTER OF THE FOREST AND THE MARINE ENVIRONMENT IS IMPORTANT IN ATTRACTING RECREATIONISTS AND TOURISTS, AND IN MEETING THEIR EXPECTATIONS."

Accordingly, those that reside in the Tongass NF area also have some expectations as well that may be in conflict with a road prohibition. One such area is transportation. Of particular concern to the commercial fishing industry is fast freight transportation of large quantities of fresh seafood. Frozen and canned seafood travel by barge while fresh seafood presently travels by ferry and/or jet service. The world market is moving steadily toward fresh seafood products.

For budgetary purposes, SE Alaska is currently undergoing a regional transportation plan that will result in less ferry freight service to central SE Alaska (including Petersburg). This reduced service will also result in higher costs per unit of freight. Additionally, SE Alaska has but one major air carrier that is having some difficulty as of late. Air freight service to communities such as Petersburg has become somewhat constrained.

PVOA has been working with various agencies to improve these circumstances. But in light of these same circumstances, we do not wish to forever preclude the possibility of a surface road out of SE AK. Examination of halibut landings in Alaska shows increased landings at those ports with the best transportation system (road and/or air) of fresh product (Homer, Haines Juneau). Alaskans have worked hard to maintain viable, healthy fisheries. We wish to keep our options open in getting the product to market. (Business/Business Association, Petersburg, AK - #7542.93200)

If for some reason a prohibition on roads in the Tongass NF emerges at the Final Rule, please budget for some additional funding for the Alaska Marine Highway System and air subsidies as our transportation options will have been reduced accordingly. (Business/Business Association, Petersburg, AK - #7542.93630)

Public Concern: The Forest Service should analyze the economic effects of the proposed rule on Alaskan railroad companies.

Sometime in the future, the Alaska Railroad may choose to upgrade its old, curvy alignment in certain locations to achieve a higher speed railroad. This would be done in the interest of increased safety and efficiency. In some cases, these realignments of the track may need to occur further than ¼ mile from the existing track. Under the proposed rules, these actions would not be allowed other than for safety reasons. The draft EIS fails to take into

consideration the cumulative impact (past, present and foreseeable future) to the economic status of the Alaska Railroad of prohibiting these improvements to the line. (Business, Anchorage, AK - #28312.93000)

Public Concern: The Forest Service should include the Tongass National Forest in the proposed rule for the benefit of commercial fisheries and the fishing industry.

Without prohibition on road building and clear cutting, the Tongass National Forest is risking a decrease in the salmon spawning areas. This degradation will be caused by increased run-off and sedimentation resulting from clear-cutting and roading. It is common knowledge that clear cutting and road construction have a detrimental effect on water quality. So, in order to log in Inventoried Roadless Areas, the Tongass National Forest is willing to risk damage to the fishing industry. The Tongass National Forest is willing to increase fragmentation, decrease habitat, decrease biodiversity, and decrease water quality. And what does the American public get on trade for this damage? They don't get anything, they have to pay for the damage. (Individual, Troy, MT - #2885.83500)

WHY HAS IT APPARENTLY NOT OCCURED TO THE FOREST SERVICE OR ANY ONE IN IT THAT WHAT MAKES ALASKA WHAT IT IS, IS SALMON? WITHOUT THE TONGASS, AND THE CREEKS AND RIVERS IT HAS, THE SAME THING WILL HAPPEN TO THE COAST OF ALASKA THAT HAPPENED TO THE COAST OF OREGON, AND FOR THE SAME REASON. TOO MUCH TIMBER WAS TAKEN, TOO MANY CREEKS GOT SILTED UP, TOO MANY LANDSLIDES AND ROAD CUTS MUDDIED UP TOO MANY RIVERS, AND NOW WE HAVE NO COMERCIAL FISHING POSSIBILITIES AT ALL IN THE UMPQUA (THERE USED TO BE A FISH PROCESSING CANNERY AT ELKTON) OR EVEN THE COLUMBIA! I know the Columbia is different because of the dams, but there are no dams in any of the rest of the rivers on the once-famous for Salmon Oregon coast. Logging did it to 'em all by itself. I watched it happen. MY People pioneered this place about the same time the early POPE and Talbot crews moved in to get logs for the exploding cities in California during the gold rush of 1849. I spent some time listening to my Dad and Uncles talk about seeing the Mollala River so full of Salmon he could "scarcely believe it." So much for history. What we need now is a Forest Service dedicated to the preservation of what is left of the forests in America so we know where we are going to get our next drink of water! (Individual, Gresham, OR - #7675.83510)

Public Concern: The Forest Service should eliminate subsidizes for road building and timber harvest on the Tongass.

Prince of Wales Island, 1.5 millions acres, had 3,700 miles of road in 1995 and the Alaska Department of Transportation was responsible for maintaining 90 miles of these roads on the island. In that same year the Alaska Department of Transportation was responsible for approximately 5,000 miles of road in a state that has over 365 million acres. The logging road component of the timber sale program is the part that costs the taxpayers the most in subsidies. The cost is huge. In 1997 (the last year we have numbers for) the cost was 33 million dollars in net revenue loss from the Tongass timber sale program. The very document that seeks to exclude the Tongass has had to admit that it will cost the taxpayers 178 dollars for every 1000 board feet of timber they plan to cut on the Tongass. This works out to a subsidy of 64,000 dollars for every logger put to work clear-cutting in Tongass roadless areas. The Forest Service is also front loading the 10 year sale program so that more than 2/3 of the roadless areas sales will be offered before the 2004 re-assessment. This is in spite of the fact that there is enough timber available from already roaded areas to supply 100 million board feet a year for a century. (Individual, Juneau, AK - #11362.93610)

According to the Wilderness Society, 'a prohibition on all logging in roadless areas, including those in the Tongass, would result in only a 7% reduction in the Forest Service's planned timber sale program. The impact on total U.S. timber production would be miniscule, and the complete coverage of the Tongass National Forest in the final rule would save the American taxpayer about \$96 million over the next 5 years – the amount otherwise lost by the government from the timber program in the Tongass. (Individual, Newark, NJ - #794.93300)

Please provide figures to support the conclusion obliquely posited by the Forest Service that roads built and maintained in Alaska cost less to build and maintain. For all the environmental concerns about the need to freeze roadbuilding activities and reevaluate the placement of roads, there exists a mandatory economic consideration. . . . While much is made of the impact to jobs and the economy of southeastern Alaska, little is said as to the cost to taxpayers for construction and maintenance of roads. Nor is the cost of clean-up from these logging operations calculated in the analysis. (Environmental/Preservation Organization, Plymouth, MN - #51067.93610)

The Tongass National Forest, that priceless coast of temperate rainforest, needs to be withdrawn from logging, gas and oil development and roadbuilding now. The jobs which will be lost could be subsidized by the money saved on building those roads. (Individual, Boulder City, NV - #1300.93600)

In recent years, the Forest Service has spent on average \$40 million more a year selling timber from the Tongass National Forest than it has returned to the U.S. Treasury. In 1992, the Tongass timber program cost U.S. taxpayers over \$64 million, losing more money than any National Forest in history. Almost all Tongass timber is exported in nearly raw form, either as pulp or cants, squared-off logs, to the Far East where it is then processed into higher value products for export back to the U.S. In 1992, for example, 97 percent of the timber products and pulp produced in the Tongass and 72 percent of the cedar logs were exported to Japan. A smaller fraction of Tongass timber was shipped to other nations including Taiwan. (Environmental/Preservation Organization, Nevada City, CA - #50392.93300)

Public Concern: Each timber sale in Alaska should include analysis of the resulting potential loss of tourism revenue.

I also urge each timber sale to take into account the potential loss of tourist revenue in Alaska (in quantifiable terms) when scenic coastlines are clearcut including a risk assessment to the potential loss of cruise ships that frequently carry 1500 passengers or more. (Individual, Olympia, WA - #13509.91000)

The two dozen diverse communities within the Alaska rainforest range from Juneau, the state's capital with 29,000 residents, to small remote villages of less than a hundred. Government, construction, and service industries are the largest segments of the local economy. But commercial fishing, tourism, and subsistence on fish and wildlife dominate the forest-dependent economy throughout the region, especially in the rural and Native villages. Logging and wood-processing support a few important communities. Generally, however, timber plays a lesser role: the regional economy continues to grow, despite periodic declines in timber related jobs. Alaska's long-term economic gold mine is tourism, increasingly and effectively promoted on the basis of its unspoiled environment and abundant wildlife. Since statehood, Alaska's annual tourism growth has averaged 10 percent. Recent trends point to even higher growth rates. Tourism in Southeast Alaska averaged an annual increase of over 20 percent since 1988, with a cumulative increase in revenue of 108 percent. But some tourism businesses now find themselves confronting limits to growth, caused by clearcut logging and related development. (Environmental/Preservation Organization, Nevada City, CA - #50392.93730)

Public Concern: The Forest Service should balance protection of fisheries and wildlife habitat with protection of timber harvesting levels and roading on the Tongass.

Salmon and their habitat are of large importance to the commercial fishing industry in SE Alaska. In 1999, ninety-five million salmon were harvested in SE Alaska, which comprised 46% of the entire statewide salmon harvest. The DEIS estimated that 80% of the salmon harvested in SE [Alaska] have streams of origin in the Tongass National Forest.

...PVOA believes that appropriate levels of logging and roading can be designed to be compatible with fisheries habitat protection.

PVOA is still committed to protection of fisheries habitat from activities in the Tongass such as timber harvest and roading. A soon-to-be-released State of Alaska study indicates that road building practices in the Tongass could be

improved to allow for improved fish passage for juvenile salmon through culverts. (Business/Business Association, Petersburg, AK - #7542.83510)

Bear in mind that once the logging is gone (and one way or the other it will), no visitors (from around the world) will want to visit the Tongass to view more logging roads and clearcuts while not catching any salmon or seeing wildlife. Small-scale local value-enhanced logging (along established roads), and sustainable fisheries and wildlife populations, combined with tourism are the best way that the Tongass should go. (Individual, Fieldbrook, CA - #7560.61300)

7.2.3 Local Tax Base, Payments in Lieu of Taxes (PILT) and 25% Funds

Often people who comment on the economic effect the proposed rule would have on communities, also comment on how they believe it would affect the local tax base, Payments In Lieu of Taxes (PILT), and 25% Funds. Some comment mainly on the quality or validity of the analysis in the Draft EIS regarding these payments. Many individuals are concerned that these payments have been or will be reduced by such a degree that schools, roads, and services will suffer. Some respondents point out that ski areas contribute a substantial amount to PILT funds, and charge that the Forest Service has failed to evaluate the effect of ski areas in roadless areas with respect to those funds.

Others state that the infrastructure and economies of local communities should not be tied to timber receipts or agency payments, or that logging should not be increased to compensate for economic decreases in payments. Some suggest that the agency pay property taxes rather than 'in lieu of' payments, and at least one individual suggests that there would be no great tax loss to communities if the agency purchased land that had no value other than scenic. Finally, some respondents believe the Forest service should seriously reconsider the method used for funding counties from timber and grazing receipts.

Public Concern: The Forest Service should verify economic statistics in the DEIS.

The report indicates a loss of 1.4 million dollars to the states, I presume from the 25% fund. This is ridiculous! When the forests were being managed Union County alone normally received 1.2 million dollars a year. (Individual, La Grande, OR - #7876.93740)

The draft EIS also understates the effects of the proposal on the Payment to the States (PTS). This revenue is directed to the counties in which the timber is cut. Most of these are rural counties with a small population base and the revenue is important to the annual budget. The draft EIS opines that the decreases in PTS would be partially offset by increases in payments in lieu of tax, or other yet to be determined Congressional legislation. The requirements of the NEPA do not allow the Forest Service to avoid the tough calculation of the effect on payments by speculating that someone else may solve the problem. The Forest Service needs to clearly state the revenue loss to the local communities, and calculate such loss based on an accurate estimate of cuts in timber sales as discussed above. (State Elected Official, Salt Lake City, UT - #43918.90010)

Public Concern: The Forest Service should consider the negative impacts of declining federal timber revenue payments to rural counties.

On page 41 of the summary the Forest Service assumes that payments to states will not be affected by the proposal because the Administration is working with the Congress to provide permanent stable payments to counties. This assumes the Administration and Congress will be able to develop such a mechanism. However, since permanent stable payments are not yet available for the counties, the Forest Service should do the analysis on how this proposal will affect the counties under current law. (Timber Association, No Address - #52501.93740)

The loss of revenue from the timber sales and other natural resources within this area is killing the tax payers as the schools and road and bridge funds are not coming in. (Individual, Salmon, ID - #7019.93730)

Rural counties will attempt to increase tax levies to recoup funds the 25% fund used to furnish. The counties will cause business to close or not to locate in their counties because of the high tax rate, poor roads, and crumbling schools. (Individual, Cambridge, ID - #1066.93730)

Revenue from timber sales in the Chattahoochee National Forest is also a significant part of our county budget. On that level it is also important to me to see that on a national level the proposed rule would have only minor impacts on timber harvest associated payments to States. I am glad to see that the Forest Service understands that these funds are important to communities that have strong affiliations with natural resources and that you are presently working with Congress to provide a permanent, mandatory payment to States based on the higher timber harvest levels of the past 15 years. (Individual, No Address - #2978.93730)

The timber dependent counties will definitely need to be compensated for the loss of revenues which are currently being paid to the counties for schools and other expenses, which, to my knowledge, is determined based on the timber sales on the national forest within the county. It is my understanding that this practice is done because the presence of large tracts of federal land within the county results in less private land from which a tax base is created. The schools and the school children do not need to become unintended victims, as a result of lowered school funding, if this roadless proposal goes into effect. Without such county reimbursement provisions, all but the most extreme environmentalists from these counties will oppose this plan. It cannot be brought down to a choice between decent schools and education versus roads in roadless areas. (Individual, Coeur D'Alene, ID - #2121.93730)

Public Concern: The Forest Service failed to adequately evaluate the contributions to Payments In Lieu of Taxes funds from ski areas within roadless areas.

The agency necessarily must conduct local evaluations for each roadless area and national forest. To demonstrate the errant agency assessment contained in the DEIS, we provide the following example from the Sky Lakes B Roadless Area in the Winema National Forest, Oregon, where the proposed Pelican Butte Ski Area (EIS completed) would be prohibited by DEIS. Because of insufficient time available during this abrupt public comment period, and because adequate data is not available from the Forest Service for all roadless areas, we are only able to provide this small demonstration of the wholesale error in the agency's superficial nationwide assessment. If there were more time to complete additional assessments, we would no doubt find that the DEIS failed to adequately evaluate the consequences of the proposed prohibition on most other roadless areas across the nation. SKY LAKES B ROADLESS AREA, WINEMA NATIONAL FOREST, OREGON. Evaluation Criteria (Selected from Table S-4. Summary of Combined Effects of the Proposed Action): Payments to Counties & Schools from timber (\$million/yr). DEIS says only \$1.4 million forgone nationwide. Winema Forest Plan/Pelican Butte EIS: Ski area special use permittee likely to yield several hundred thousand dollars annually to Klamath County & local school districts; Ski area harvest (one-time) would return \$0.3 million to Klamath County & schools (all \$ payments forgone by DEIS) (Timber Industry or Association, Eugene, OR - #15879.7000)

Public Concern: The Forest Service should consider that the purchase of private land to preserve scenic value will have little effect on local tax bases.

I believe very little of the county "tax base" will be lost by the purchase of private land that has primarily "scenic" value. (Individual, Ellensburg, WA - #7352.93730)

Public Concern: The Forest Service should do away with the trust fund and timber receipt programs.

There are a number of attributes of FS budgets and how books are kept that have outlived their usefulness. These procedures had, I assume, good rationale behind them when the Agency's primary mission was a sustained yield/even flow of timber to market.

The first of these are the various trust funds that allow the FS to retain a portion of timber sale receipts for reforestation, slash disposal, and other activities. The intent was to assure that when a timber sale was made funds would be available to reforest and manage the site. That seemed logical enough.

But some critics maintain that these trust funds have become an incentive to make timber sales. These funds were used to finance overhead and other organizational costs. The FS was accused of making sales simply to support the agency. In short the trust funds evolved into "distrust" funds. In addition, these funds are counted as costs of making timber sales. It is time to do away with these trust funds. Receipts from the sales should be directed to the Treasury. Congress can then, at its discretion, appropriate funds for those purposes. (Timber Association, Medford, OR - #13658.93644)

The second row [of Table S-1] that's really interesting I think is the timber receipts, which also go down towards the right. That's also better for society on the argument that in a money losing program, the less money you spend the less money you lose, so if you spend a dollar, every dollar that you invest you lose ten cents, which is essentially the way the timber sales program runs, although the numbers are different, if you spend \$1 you lose ten cents. If you spend \$10, you lose ten times that, \$1.

In a money losing program, you want to minimize your investment as much as you can, so that's an added incentive. As far as you go out to the right, you see that you're going to lose less money because the program is smaller, better for society. (Individual, No Address - #21329.93655)

I advocate payments from timber to states and counties be eliminated, and U.S. Forests pay county property taxes same as private owners do. (Individual, Eugene, OR - #1262.93740)

Public Concern: The Forest Service should not support Senate Bill 1608 which would require increased timber harvest to fund county schools.

In recent years, because of a decrease in logging in some communities--due to both unsustainable logging practices and various protection measures--payments to counties have declined, and some rural school systems have suffered. We are opposed to the S.1608 which would force the Forest Service to increase logging to make more money and give control of the lands to local interest, linking funding for schools with destruction of our forests. (Individual, Birmingham, AL - #18185.93800)

Public Concern: The Forest Service should reconsider the method used for funding counties from timber and grazing receipts.

Twenty Five percent of gross receipts from timber sales and grazing activities go to counties within which these activities take place. These payments are used by counties for roads and schools, and are considered as a cost of the management activity. These payments are considered its contributions to the counties as a replacement for taxes. Perhaps the larger policy question is, whether this mechanism of funding the education of essentially rural children

is appropriate for the wealthiest nation in the world. Critics of this provision of law maintain that those payments are an incentive for elected county officials to support timber extraction and grazing.

However, as environmental concerns have reduced both timber extraction and cattle numbers, county officials are less and less enamored of this long-standing, but now unstable and dwindling, source of revenue. It is time for counties to receive yearly payments in lieu of taxes. This would shift the "tax obligation" from timber extraction and grazing to payments to counties equal to but in lieu of taxes.

One result of such a shift would be that these costs would no longer be counted by critics as a cost of timber sales and livestock grazing. This would place national forest accounting on a more comparable basis with private lands. (Timber Association, Medford, OR - #13658.93740)

7.2.4 Grazing Permits and Fees

A few respondents comment on the economic impacts and cost effectiveness of livestock grazing on public lands. Some request the Forest Service stop subsidizing grazing interests because it is not fair to private ranchers. Others feel that livestock grazing permits should cost more, or that grazing should be sharply curtailed on public lands. Others, however, believe livestock grazing on public lands is beneficial to the economy. At least one individual suggests grazing interests should be protected so that ranchers won't have to sell and develop their land, thus adding to urban sprawl.

Public Concern: The Forest Service should analyze the economics of livestock grazing on National Forests and Grasslands.

ELIMINATE GRAZING SUBSIDIES

The policy of supporting private ranchers and livestock interests who have access to relatively cheap grazing permits on forest lands needs to be questioned; since these interests are only involved in a subsidized form of competition with those who do not have equal access and can only graze livestock on private lands, usually at far greater expense. (Individual, Geneva, NE - #1788.90340)

Animal grazing permits and fees should be based on market rates. (Individual, Califon, NJ - #5291.90340)

CURTAIL GRAZING

Grazing fees are way too low. Grazing should be mostly curtailed on Public land. (Individual, Mesa, AZ - #6784.90340)

CONTINUE CURRENT GRAZING

I know that the grazing of livestock is good, because it does the land no harm and is a good money return of land use fees. (Individual, No address - #2157.90334)

Many people depend on the forest for grazing cattle. Many families have been supporting themselves for generations in this manner. This is an honorable pursuit which feeds thousands of people. Are we really benefiting by curtailing these activities? (Individual, Manti, UT - #13759.93700)

When the ranchers can't use the forest for grazing, many of them can't afford to stay in business. Then, they must sell land, usually subdivided! This brings in more homes and less open space. Grazing interests in the forest must be protected. (Individual, Nathrop, CO - #8416.90340)

7.2.5 Minerals, Oil and Gas

A number of respondents are concerned about the effects of the Roadless Area Conservation Proposed Rule on the mining and oil and gas industries. Some citizens and many representatives of mining and oil and gas companies are concerned that the proposal would have a severe economic impact on the industries, which would also affect the nation's economy. Respondents are not only concerned about already discovered minerals but about minerals that are yet to be discovered and the economic implications thereof. One individual writes, "It is very clear that the USFS has not considered the economic impact of the proposed rule on mining revenues in areas where the proposed rule would increase the cost of mineral extraction beyond the return of the market prices for the minerals." Some point out that mineral and oil and gas exploration is not only crucial to the economy, but that these companies are required to mitigate any environmental impacts of their operations. Many also find fault with the economic analysis of this issue in the Draft EIS.

A substantial number of individuals and companies are concerned that the proposed rule will delay approval of current and proposed mineral operations, including exploration, surface activities, and development, causing a significant economic impact. One respondent asserts, "Exploration and development activities will be significantly reduced or eliminated in the 'roadless area' between Big Springs and Jerritt Canyon. The delay of years and the EIS expense of hundreds of thousands to a million dollars or more will be prohibitive to almost any exploration or mining company. There is a significant potential for the loss of an otherwise economic resource and the associated loss of local jobs."

A few citizens request the Forest Service make restitution payments for the investments in licensing and exploration costs that mining operations would not be allowed to recoup because of this rule. Claims one company, "Should the Forest Service fail to create an exemption that allows the construction of roads for leasable coal in designated roadless areas, the government will be responsible to make those who have not yet seen a return on their exploration licenses whole by paying restitution of licensing fees and perhaps other investments made in reliance upon the existing regulatory regime."

Conversely, other respondents state that mining and oil and gas exploration are not only incompatible with roadless area conservation, but are not economically practical, or that the agency should buy subsurface rights. One proponent of the proposed rule suggests mining should be prohibited on National Forest System lands because "the economic value will never have a nettable return."

Public Concern: The Forest Service should consider the effect the roadless initiative will have on the coal and oil and gas industry.

The proposal fails to exempt the oil and gas industry from the road ban even though the industry is financially obligated to construct, maintain and reclaim all oil and gas roads in accordance with agency standards and guidelines. It dramatically increases the cost of oil and gas activities by precluding leasing, leasing areas with no surface occupancy or requiring expensive access to leased roadless areas. (Individual, Casper, WY - #43177.93540)

I am opposed to the Roadless Initiative and urge the Forest Service to reconsider the implementation of this rule in the Dakota Prairie Grasslands. This rule will have a devastating impact on the oil and gas industry and the economy and well being of the state of North Dakota. The following facts support my opposition to the Roadless Initiative. The BP Amoco Mandan Refinery receives 36% of its supply from the grasslands. Decreasing production in ND reduces the supply of crude and places the future of the refinery at risk.

27% of the state's oil production and 30% of the state's producing wells are on the grasslands. The future of the industry to produce oil and gas lies in the grasslands.

Economic impact to North Dakota from oil and gas production on the grasslands alone include:

*Total revenues of over \$20,000,000 and royalties in excess of \$25,000,000

*Production and extraction tax revenue of \$15,000,000

*More than 940 full-time jobs

The oil industry in ND has explored and drilled the grasslands for the past 50 years and has restored over 500 wells and 480 miles of roads. This represents more than 5,500 acres returned to vegetation after the oil and gas reserves were depleted.

This proposal will not allow production to increase and will lead to less production in the future. Last year there was a 3.2% (607,000 bbls per day) increase in U.S. demand for crude oil and a 2.2% decrease in domestic production. The U.S. reliance on foreign crude has increased 56%.

This one-size fits all program does not meet the needs for management of the Dakota Prairie Grasslands in ND. Fast and effective reclamation is not the case in forests or with other industries that impact the environment. Oil and gas reserves in ND can be developed on public lands by the oil industry with little environmental impact and technology continues to lessen the impact of production and enhance the reclamation efforts. (Individual, Bismark, ND - #7028.93540)

The DEIS estimates that 377 billion short tons of coal reserves in the Northern Rocky Mountains and the Great Plains region may be affected by this rule making....In 1999 just over 376 million tons, or 34 percent of the 1,094 billion tons of coal mined in the United States was produced in this region....All of this coal went to electric utilities to use in the generation of electricity. Production levels in this region have and will continue to grow rapidly due to the coal's characteristics, low cost of production, and its proximity by rail to areas where electricity requirements are growing rapidly. Removal of this resource base from development will have the effect of increasing the cost of electricity and could result in an increase in imports of either coal or petroleum. This is not wise energy policy for a nation whose economic base is dependent upon low cost electricity to meet a growing share of energy needs. (Mining Association, Washington, DC - # 43583.93000)

The Draft EIS has no quantitative analysis of the oil and gas resource potential that would be foregone. COGA members have been unable to obtain timely, detailed mapping information in order to assess impacts of the proposal on existing lease development. In at least one case, however, the proposal would preclude additional drilling on a portion of a producing federal gas unit that has generated over 62 billion cubic feet of gas. Federal gas royalties attributable to the portion of the unit proposed to be made off-limits exceed \$2.3 million. This despite the fact that there are two wells with existing lease roads in the heart of the proposed "roadless" acreage. (Business Association, Denver, CO - #52419.93100)

Public Concern: The Forest Service should reevaluate the full social and economic effects of the proposed rule on present and future mineral exploration, production, and development.

The DEIS's mere lip service to the Stillwater Mine is also inexcusable. See DEIS at 3-192, Cost-Benefit Analysis ("CBA") at 24, Initial Regulatory Flexibility Analysis ("IRFA") at 21 (identical single sentence in each place simply identifying Stillwater). The Forest Service conducted no meaningful analysis for the important Stillwater mining area. (Mining/Oil Company or Organization, Washington, DC - #52224.93100)

We agree with the government's own assessment that the proposed rule will extend the approval process and increase the cost for mineral exploration and development (page 3-143) and will result in fewer mining-related, high-paying stable jobs and a reduction in U.S. Treasury receipts (page 3-194). We believe the Federal government

should quantify the full economic impact of the proposed rule on mineral exploration and development. (Mining/Oil Company or Organization, Salt Lake City, UT - #6766.93510)

Pages 3-144 and 145. The analysis needs to include areas that have the potential for leasable minerals. Those areas that are within the unroaded portion of the roadless area should be delineated. Estimates of leasable minerals in the unroaded portion of the roadless area should be compared to leasable mineral deposits outside roadless areas. Estimates of potential losses from the prohibition of developing this resource should be addressed in the EIS. (County Elected Officials, Fallon, NV - #17290.93510)

The proposed rule strongly implies that locatable minerals cannot be explored for or developed in inventoried roadless areas by current methods. It sends a strong message that the Forest Service will do everything it can to deny access for mineral exploration and development. This message directly contradicts the assertion that "valid existing rights" will be respected. It is clearly inappropriate to deny roaded access for trucks and other equipment required to develop a mineral deposit into a producing mine. Furthermore, helicopter access is cost prohibitive for most exploration geologists and small mining companies. The result will be very serious, and wholly adverse, economic consequences for these people, as well as their contractors and suppliers. (Mining/Oil Company or Organization, Spokane, WA - #16091.90320)

The DEIS does not make any attempt to quantify the resource base that will be effectively put off limits by this rulemaking. Although this is some attempt to quantify "undiscovered" resources of coal, gold, silver, copper, lead and zinc, there is no attempt to quantify the quantities of already discovered resources that will be affected. Estimates made by the US Geological Survey suggest that these resources could be significant. (Individual, Washington, DC - #15877.93510)

It is very clear that the USFS has not considered the economic impact of the proposed rule on mining revenues in areas where the proposed rule would increase the cost of mineral extraction beyond the return of the market prices for the minerals. Since the state of Nevada's and many rural counties' budgets in Nevada depend upon taxes on mining to support their budgets, there must be analysis for impacts on mining and local economies which depend on mining that is equal to or better than the economic impact analysis supplied in the DEIS and cost-benefit analysis for logging communities potentially affected by the proposed rule. To omit such analysis and supply the scant analysis found in the USFS' documents on the subject of mining is ample grounds to require the DEIS materials on mining to be re-issued. As a taxpayer in the state of Nevada, I require that any DEIS for any proposed action of this size and scope within the state of Nevada supply proper economic analysis of the impact on taxpayers at the state and county level. (Individual, Reno, NV - #44188.93100)

The Report of the Socioeconomic Specialist states (at page G-11) that some mineral projects over the next five years may result in discoveries of valuable mineral deposits. Certainly, the proposed action is for a much longer term. The analysis must consider the likelihood that ALL UNDISCOVERED RESOURCES IN THESE UNROADED AREAS WILL NEVER BE FOUND NOR DEVELOPED. As the GAO pointed out in 1982, and is certainly more evident today, industry is reluctant to explore for minerals in designated or proposed wilderness areas, and it quoted the Public Land Law Review Commission in 1970, "private enterprise without assurance of development rights will not have the incentive to finance such surveys." GAO Report at page 8. (Individual, Purcellville, VA - #15876.72600)

The Forest Service analysis used data showing the estimates of undiscovered mineral in the permissive tracts at the 50th percentile. ID. In other words, at the 50th percentile there is an equal chance that the actual estimate of quantity is higher or lower than that estimated by the USGS. Even so, the data show that there are extremely significant undiscovered resources in the permissive tracts. I agree with the analysis that the figures in tables G-4 to G-7 in the Socioeconomic Specialist Report are likely overestimates. However, given that the Forest Service provided no other site-specific data, we are left with the Forest Service's own conclusion that there LIKELY ARE significant undiscovered mineral deposits in inventoried roadless areas under consideration. I ABSOLUTELY DISAGREE WITH THE CONCLUSION ON PAGE G-14 OF THE SOCIOECONOMIC SPECIALIST REPORT WHICH STATES: "THEREFORE, LITTLE ECONOMIC EFFECT IS EXPECTED IN THE SHORT TERM. IN THE LONGER TERM, EFFECTS DEPEND ON WHETHER MINERAL PRICES INCREASE, AND WHETHER THE RELATIVE COST OF DEVELOPMENT OF MINERAL RESOURCES ON

NFS LANDS IS MORE ATTRACTIVE THAN DEVELOPMENT OF RESOURCES IN OTHER LOCATIONS." (Individual, Purcellville, VA - #15876.43000)

The first conclusion is rebutted by the Forest Service's own Socioeconomic Specialist Report at page G-12, which states: "THERE IS NOT ENOUGH INFORMATION AVAILABLE, HOWEVER, TO QUANTITATIVELY ESTIMATE THE DEGREE TO WHICH JOBS, INCOME, AND REVENUE WOULD BE REDUCED BY THE PROPOSED RULE." (Emphasis added.) Given this statement, one cannot conclude that there will be little economic effect in the short term. The data in the DEIS show emphatically that there is a significant potential for major negative effects. Moreover, the detailed geological and minerals data collected by the Forest Service, USGS, and BOM during the RARE II process and after, are available but have been ignored by the Forest Service. This indicates that the Forest Service is deliberately seeking to avoid acknowledging the adverse economic impacts of its proposal.

The second conclusion is wrong in that it neglects to recognize this fact: Denial of access in Alternatives 2-4 will be the paramount determining factor on whether or not mineral activity will occur. NO ACCESS MEANS NO EXPLORATION AND NO FUTURE DEVELOPMENT AND PRODUCTION. One can therefore conclude that there will be significant negative economic effects from denial of access to tens of millions of acres of National Forest System lands in permissive tracts identified by the USGS. (Individual, Purcellville, VA - #15876.43000)

The DEIS has not addressed in any meaningful way the impacts of the proposed roadless conservation areas upon mineral activities, impacts to the economy - both local and national, and has failed even to utilize the site-specific minerals and geologic data developed over the past 30 years by the Forest Service, the BOM, the USGS, and the various state agencies.

The National Research Council in its 1999 report entitled, "HARDROCK MINING ON FEDERAL LANDS" (at page 75), was highly critical of the major information gaps in the Forest Service and Bureau of Land Management: "The Committee was consistently frustrated by the inability of federal land management agencies to provide timely, accurate information regarding how they manage their lands and the status of mining projects under their jurisdiction. The agencies could provide only approximate information regarding protected lands under their jurisdiction, the area currently subject to mining claims, the area covered by land use plans, and other basic land use statistics.

Information about current mining activities was even scarcer. The lack of information appeared to be greatest among highly placed officials who have the greatest need to know. Consequently, those responsible for regulatory management and change, and for keeping the public and Congress adequately informed, appear to be severely limited in their ability to do so." (Individual, Purcellville, VA - #15876.93500)

Public Concern: The Forest Service should not delay approval of mineral operations, including exploration, surface activities, and development.

Time frames for approval of mineral operations have increased and the likelihood of extensive approval delays is extreme. The current policy is reflected in an official Forest Service Minerals and Geology newsletter article by the Director of Minerals and Geology Management which states: "Recently, there have been questions about [Fiscal Year] FY2000 budget advice, which call for prioritizing administration of existing operations to standard over approving new operations. To be consistent with out-year budget requests, maintain Agency credibility, and fulfill Agency stewardship responsibilities, we must administer our existing operations to standard BEFORE WE INTRODUCE NEW PROPOSALS INTO THE SYSTEM." (Individual, Purcellville, VA - #15876.93510)

Exploration and development activities will be significantly reduced or eliminated in the "roadless area" between Big Springs and Jerritt Canyon. The delay of years and the EIS expense of hundreds of thousands to a million dollars or more will be prohibitive to almost any exploration or mining company. There is a significant potential for the loss of an otherwise economic resource and the associated loss of local jobs. (Individual, Purcellville, VA - #15876.93510)

The roadless conservation proposal will affect not only ongoing and planned development and production activities of SMC and other companies. If the Forest Service proposal is adopted significant areas of the SMC mining claim group along the complex will be adversely affected. Roads will be required to construct additional ventilation shafts

and escapeways to maintain safe operation of the mine. Delays in approval of surface activities necessary for underground operations will increase the cost to the company and may reduce the amount of economic reserves. SEE Statement of T S Ary, July 14, 2000. Bypassed mineralized areas may be lost. Changes in mining methodology may be required. (Individual, Purcellville, VA - #15876.93510)

The West Elk coal mine is located in Gunnison County, Colorado, on the Grand Mesa, Uncompahgre, and Gunnison National Forest ("GMUG") and is operated by a subsidiary of Arch Coal, Inc. The mine is one of several producing and idle coal mines in the Paonia-Somerset Coal Field which was discovered in 1893. West Elk is an underground long-wall deep mine operation and produces approximately 7.3 million tons per year. The coal seams average 5-16 feet thick and range from a depth of 5,000 feet to just below the surface.

The coal is high-BTU, low-sulfur "compliance" coal. This means that the coal is excellent for use in power generation due to its low emissions compared to other eastern and western coal. This coal is currently in high demand due to implementation of the 1990 amendments to the federal Clean Air Act. All of the West Elk coal is used in power generation. Estimated reserves at this mine approach 150 million tons.

The mine employs 300 people with the highest wages in the area. The mine pays an 8 percent federal royalty and a 1.5 percent state severance tax. Delta County received over \$1.1 million in revenue sharing from those taxes and royalties. (Data supplied by Western Slope Environmental Research Council Fact Sheet, February, 1999)...

The West Elk Mine lies near the northwest corner of the 176,000-acre West Elk Wilderness and abuts inventoried roadless areas...The GMUG National Forest was scheduled to issue a Record of Decision and Final EIS for coal lease applications by Oxbow Mining Inc. and Bowie Resources Ltd. in April, 2000, for approximately 3,000 acres in Delta and Gunnison Counties. Processing these coal lease applications has been delayed, likely because they overlap inventoried roadless areas affected by the proposed rulemaking. (Individual, Purcellville, VA - #15876.93540)

Forest Service decisions to consent to leasing of federal coal on national forests and grasslands are discretionary actions. These decisions cannot be arbitrary or capricious and must be based upon sound environmental analysis and federal law and policy. The proposed rulemaking and DEIS would prohibit road construction and reconstruction in inventoried roadless areas and cause a review of earlier forest plan decisions and scheduled lease sales. The rulemaking and DEIS would delay new leasing (which would presumably include lease modifications to existing leases) for review of forest plans and earlier decisions, and would likely restrict the opportunity for exploration and development of undiscovered coal resources. SEE DEIS page 3-145.

For the West Elk Mine, needed roads for exploration to expand reserves and develop new leases would be prohibited or greatly delayed awaiting forest plan review, amendment, or revision. New leasing already has been delayed due to the rulemaking and EIS process, and it may be blocked entirely if the proposed roadless designations are made.

The DEIS has not analyzed the effects of the rulemaking on coal production, exploration, or leasing opportunities in the Delta and Gunnison Counties of the GMUG National Forest in Colorado. There certainly will be negative impacts to the economy of the local communities, and to the ability of coal-fired power plants to obtain high quality, environmental "compliance" coal. This will have a negative impact for the region as well due to the electric utilities who rely on this coal and the communities served by those utilities. Delays in decision-making can result in the by-pass of coal in the leasing and mining processes. These by-passed coal resources likely would never be economic in the future, because the development infrastructure of the ongoing mining operation would be lost. (Individual, Purcellville, VA - #15876.93540)

Public Concern: The Forest Service should assess the potential loss of mineral lease income that may result from the proposed rule.

On p.26 of the CBA (Cost-Benefit Analysis), it states that "Mineral activities on National Forests and Grasslands generated over \$100 million in receipts to the U. S. Treasury"... The CBA further estimates that there are 4,684 metric tons of gold, 142,036 metric tons of silver and over 200 million tons of copper, lead and zinc resources contained in the inventoried roadless areas. There is no attempt to compute the value to the U. S. Treasury of the potential loss of mineral lease income in the proposed IRA's and no attempt to compute the loss in state and local mineral tax revenue from the proposed rule. Further, there is no attempt to compute the secondary tax revenue decreases from the loss of jobs, sales, and property taxes at the state and local levels where the proposed rule would impact local economic activity.

The net summary of all the quantifiable data that is found in the CBA shows a net loss to the U. S. Treasury from the proposed rule, with the quantifiable costs larger than the benefit by at least an order of magnitude. (County Agency, Eureka, NV - #17268.93100)

Public Concern: The Forest Service and administration should employ policies and actions that provide the minerals industry with low risks associated with mineral exploration on the National Forests.

Mineral exploration, development and production have been and continue to be a significant part of the economy derived from the National Forest System. In the recent past, gross value of production of all minerals approached \$4 billion annually. The latest figures of the Forest Service show that figure dropping to approximately \$2 billion... This drop can be attributed to several factors. First, the drop in commodity prices for gold, coal, and oil over the past several years has reduced the amount of National Forest lands available for mineral resource exploration and production. This reduced exploration has resulted in the inability to replace mineral production lost due to deposit exhaustion, price decreases, and increased costs. And third, the policies and actions of the Forest Service and the administration have had a chilling effect on the willingness of the minerals industry to accept the risks of mineral exploration on the National Forests.

Many National Forest System lands also have been put off-limits to oil and gas leasing, exploration and development. A recent example is the decision to deny leasing along the Rocky Mountain Front of the Lewis and Clark National Forest in Montana. In spite of the United States' increasing dependence upon foreign oil, acres under lease for oil and gas have precipitously dropped from a high of almost 35 million acres in 1983 to a low 5.4 million acres in 1998. . . . In other words, new mineral operations in National Forests will not be approved in a timely manner, if at all. (Individual, Purcellville, VA - #15876.93510)

Public Concern: The Forest Service should address the feasibility and cost of mining inside roadless areas or in areas surrounded by roadless areas.

Specifically in the Caribou National Forest in Southeast Idaho... acres of phosphate leases are bounded by roadless areas. [Other acres] of lease areas to be offered are bounded by inventoried roadless.

There is much speculation about the portion of phosphates leases bounded by roadless to be offered for sale in the near future. Will it be feasible to mine inside or surrounded by roadless, and if so, what will be the extra cost involved? (Individual, Lava Hot Springs, ID - #18244.93510)

Public Concern: The Forest Service should consider the impacts of the proposed rule on energy resources that provide fuel to heat and light homes and to power industries.

Senators Enzi and Thomas, both of Wyoming, recently use these descriptions of the Powder River Basin: "The Powder River Basin in Wyoming and Montana in one of the world's richest energy resource regions, possessing the largest reserves of coal in the United States and significant deposits of oil and natural gas, including coalbed methane.

Development of these valuable resources is of critical importance to the American public.

These energy resources provide fuel to heat and light our homes and power our industries.

Extraction of the energy resources provides royalties, taxes, and wages that contribute to national, State, and local treasuries and economies."

S. 1950, "To amend the Mineral Leasing Act of 1920 to ensure the orderly development of coal, coalbed methane, natural gas, and oil in the Powder River Basin, Wyoming and Montana, and for other purposes," 106th Cong., 1st Sess., November 17, 1999. (Individual, Purcellville, VA - #15876.93540)

Public Concern: The Forest Service should explain the rationale for predicted increases in mineral and natural gas production given the current and proposed policies affecting the national forests.

The latest data developed by the Forest Service...show FY 1999 gross value of mineral production of \$2.195 billion increasing to an estimated \$3.596 billion in FY 2006. As can be seen from the data, large increases in copper, gold, silver, platinum/palladium, and natural gas production are forecast.

It is difficult to understand the rationale for expected increases in production given the current and proposed policies affecting the National Forests such as the Roadless Rulemaking. Nonetheless, the amount and importance of mineral production from National Forests remains significant. (Individual, Purcellville, VA - #15876.93510)

Public Concern: The Forest Service should make restitution for the investments in licensing and exploration costs that mining operations will not be allowed to recoup because of this rule.

All those who have paid the licensing fees to explore in roadless areas will now have no means of recouping that investment, for any knowledge or data gained will be useless if a lease to mine the discovered coal cannot result from it. Thus, should the Forest Service fail to create an exemption that allows the construction of roads for leasable coal in designated roadless areas, the government will be responsible to make those who have not yet seen a return on their exploration licenses whole by paying restitution of licensing fees and perhaps other investments made in reliance upon the existing regulatory regime. (Mining/Oil Organization, Washington, DC - #52224.53000)

Public Concern: The Forest Service should not allow mineral and/or petroleum mining because these operations will never make a net return and are harmful to the environment.

[I am] totally opposed to any DEVELOPMENT in the roadless areas to develop mineral &/or petroleum since the economic value probably will never have netable return. (Individual, Great Falls, MT - #6430.93500)

If oil and gas is not dealt with, many roadless areas, including a number in the East, will be destroyed. The Forest Service needs to either buy the subsurface rights of potential oil & gas claim areas or to prohibit oil & gas development of roadless areas, including road building to claims. (Individual, Washington, DC - #43962.93510)

7.2.6 Agency Costs, Financial Responsibilities, and Funding General

Among the variety of economic concerns people comment on, one of the most prominent and perhaps most diverse is that of agency costs, financial responsibilities, and funding. In this area, too, some challenge the validity of the analysis of agency expenditures, and ask where the agency is going to acquire funding if not from traditional sources. Some suggest that "the Forest Service must include the cost of litigating this "Proposed Action" as a cost to the agency." One business, however, suggests a more prohibitive alternative be selected to save the agency and taxpayers' money. "It is a well known fact," asserts this company, "that management that suspends logging and road building and other developments on a National Forest is much cheaper to implement than management that does not suspend such activities." Others ask the Forest Service to explain how "overall agency costs are expected to remain the same" under Alternatives 2 through 4 when 60 million fewer acres would be managed.

Other respondents suggest that Forest Service funding be increased to allow employees to do the work expected of them. One timber association suggests the Forest Service budget be presented to Congress on a forest-by-forest basis; then "...Congress would be responsible for the distribution of funds," asserts this respondent, "and would get both credit and blame for budget outcomes. Second, members of Congress with national forests in their congressional districts or states would, of political necessity, become quite interested in those entities. Third, members of Congress would become at least somewhat responsible for those national forests thereby sharing the credit or blame, for such activities." Finally, some respondents argue that the Forest Service should assure that conservation dollars are actually spent for that purpose.

Section 7.2.6.1 addresses public comment on the costs of fire control and fuels treatment, often drawing comparisons between the costs of road construction and the costs of fire control. One individual would like the Forest Service to explain how monies collected for removing timber and slash for fire prevention purposes have been spent. Others feel there should be better analysis of the costs of fire suppression versus the costs of fuel treatment. Still another respondent suggests the costs of fire management and regeneration be subtracted from the value of the timber products harvested to effect that mitigation. Many ask the Forest Service to specifically address the costs of fuel reduction and increased fire hazards in roadless areas. With respect to funding, some suggest the Forest Service lobby Congress for funding to address the issue of thinning in fire prone areas. Others argue that to save taxpayer money, the Forest Service should harvest timber, rather than conduct prescribed burnings. Finally, it is suggested by some that the proposed rule would increase susceptibility to catastrophic fires, which would harm the tourism industry.

Section 7.2.6.2 addresses public comment on agency costs and the timber industry. Those generally opposed to the proposed rule argue that it will have a negative economic impact on the timber industry. Some argue, for example, that notwithstanding the Forest Service's claim to the contrary, reductions in harvest resulting from the prohibitions would indeed affect timber prices. Others ask that the Forest Service analyze the allowable sale quantity potentially generated from each roadless area. One timber association believes the Forest Service should undertake a serious examination of "below cost" timber sales, and goes on to argue that it would be more advantageous to both the Forest Service and timber companies for the Forest Service to sell timber "when the price is right" rather than on a set schedule which ignores market conditions.

Respondents who generally favor the proposed rule have a number of concerns related to agency costs and the timber industry. A number of individuals and environmental groups believe the link between agency funding and timber harvest should be severed. Only then, these respondents claim, will the Forest Service make a serious attempt to protect these lands. Some believe the Forest Service should get out of the timber business because the government should not be in competition with private individuals, others because timber harvest plays such a small role in the economy that society can well afford to leave these places alone.

A number of respondents who comment on these topics focus on environmental concerns. Many believe the Forest Service should establish funding for seeding trees and restoration work for logged areas. Others suggest the cost/benefits of revegetating, stabilizing, and maintaining logged areas be examined. Some respondents argue that costs of timber sales must include

Environmental Impact Statements, costs of road building and maintenance for the life of the road, loss of recreational revenues, and costs of water purification. A number of individuals also assert that the government must accept the responsibility for stopping extractive practices and find the money to pay for the damage already done to the environment.

Finally, a number of respondents believe there should be greater agency accountability for its actions with respect to timber harvesting. One individual specifically requests that the General Accounting Office perform routine inspections to keep the Forest Service “on track” and inform the public about the economic viability of Forest Service timber harvest activities. Others believe the Forest Service should be held monetarily accountable for its financial reporting accuracy.

Section 7.2.6.3 covers public concerns regarding government or agency subsidies to businesses or corporate interests. Most who comment on this topic believe the agency should eliminate subsidies. One individual writes, “Why should private logging companies get a subsidy in order to harvest timber from lands they don’t even own?” Some suggest the beneficiaries of timber harvests should shoulder the major cost of road construction, maintenance, and reconstruction. Others state that if the Forest Service does subsidize the timber industry, then timber companies should go through the proper and official process of governmental review and oversight. Others contend, however, that timber companies are not being subsidized. Remarks one respondent, “Forest roads were never a subsidy; purchasers paid more for timber where access was in place.” Some suggest that, with respect to subsidies, the Forest Service should address costs for recreational use of National Forest System lands. Finally, one individual suggests the Forest Service subsidize recycled rather than virgin fibers for paper production.

Section 7.2.6.4 covers public concerns over the costs incurred specifically for the roadless Area conservation Proposed Rule. Many believe the Forest Service should disclose the amount and source of money used for the proposed rule. Some wonder, with respect to this rule, how acquisition of property and rights-of-way will be funded. Others wonder how the costs that will be incurred due to lack of management access for wildfire and forest health will be offset. Some individuals believe this whole project is evidence the Forest Service has been budgeted too much money; and many claim the agency should not be spending taxpayers’ money on the proposed rule, rather it should be spent at the local level. Some individuals, however, believe the Forest Service should consider tax-based funding to implement the proposed rule. Remarks one respondent, “I personally would gladly be taxed to see that this proposal flies.”

Section 7.2.6.5 addresses public concerns over funding for monitoring and enforcement of regulations. The regulations people most often express concern over are those relating to timber harvest and to user created roads and trails. (See also Chapter 6.) Respondents ask the Forest Service to explain where the money will come from to fund law enforcement and manage projects created by the proposed rule. Many believe agency funding should be increased to cover enforcement of existing laws. Some respondents, however, believe the real way to prevent user created roads and trails is to ensure adequate, well regulated access.

Section 7.2.6.6 addresses concerns over costs associated with forest travelway infrastructure and management. One individual questions whether the interim moratorium on road building or

maintenance saved any money. Others challenge the validity of the \$8.4 billion road maintenance backlog calculation and the assertion that it justifies the need for this policy. Many state that the estimate is based on faulty analysis. Others claim the Forest Service has all the funding it needs to maintain its road system; it just needs to set its priorities straight. One individual is concerned the Draft EIS failed to disclose the massive amount of Watershed Improvement Needs Inventory backlog which represents the backlog of rehabilitation and restoration projects needed to repair damage to the watershed and ecosystem.

Many respondents request the Forest Service assure funding for continued road maintenance. A number of writers feel the Forest Service should spend money on maintenance rather than building new roads. Others would like the Forest Service to ask other public agencies for assistance with the Forest Service road network. Writers assert as well that the lack of funding for maintenance should not be used as an excuse to close roads; and indeed some suggest that where maintenance costs are prohibitive, the Forest Service should consider posting some roads as unmaintained with travel at one's own risk.

A number of respondents believe the Forest Service should acknowledge that in the past road maintenance was provided by timber sale purchasers. Others request the agency correct its estimate of the savings from reduced road maintenance to reflect recent expenditures on roads. Some respondents believe the Forest Service should address the relation between its lack of funding for road maintenance and its continued funding for international forestry programs. At the same time, others assert that the agency should disclose the funds it has spent on road obliteration. In this vein, many writers claim that closing roads or restricting motorized access would hurt the economy, thus roads and trails should be maintained. On the other hand, argue some, if roads must be closed due to lack of funding, they should be decommissioned naturally, or by gating or placing ditches across them. Finally, one individual believes the Forest Service should consider the negative impacts of roadless area designations on usable Forest Service roads and the Purchaser Road Credit Program.

Many respondents believe, however, that continued road building/maintenance is not in the best interest of national forest lands. Some assert that the Forest Service should not spend funds building roads into all roadless areas just to make it easier to fight wildfires. Others ask that the Forest Service explain who finances the design and planning of logging roads, arguing that if it's the Forest Service, then cutting off financing would end road construction and, therefore, resource degradation. Many respondents suggest that any funds otherwise earmarked for road maintenance should be used for other management activities: e.g., for alleviating the environmental impacts of roads; for facilities upkeep; or upgrading existing four-wheel drive roads.

Respondents also comment on Forest Service requests for funding. Some suggest the Forest Service provide a comparison between agency requests for maintenance funding and congressional appropriations for that purpose over the past five years. Others believe Forest Service Chief Dombeck should ask for funds to adequately support recreation and trails programs.

Section 7.2.6.7 addresses public concerns over user fees and costs for recreational opportunities. Many respondents believe there should be increased funding for support of recreational goals and uses of roadless areas. In support of such funding, many say the Forest Service ought to consider the fees and volunteer services contributed by users to maintain roads and trails. One individual claims, however, that funding from the OHV community may be terminated due to agency misuse of those funds. On the other hand, some suggest that the formula used to determine the share of the gasoline tax for OHV recreation should be audited due to the adverse impacts caused by motorized recreation.

The topic of user fees is of great concern to many. Respondents write that the Forest Service should not make the public purchase permits or charge user fees to use public lands. Some specifically request that the Forest Service discontinue the trail park fee demonstration program, others the Adventure Pass program. Other writers, however, believe a fee or permit system is fully justified: one respondent feels fees should be charged based on the amount of damage a given activity causes; another suggests imposing a \$15.25 fee on bicycles and cross-country skis; while yet another asks that the trailhead permit system be expanded. Finally, some claim the Forest Service ought to address the "willingness to pay" principle.

Public Concern: The Forest Service should address the consequences of reduction of its traditional revenue sources.

The Forest Service receives revenue from grazing, lumbering and mining. Will that be replaced by money from the general fund or will the Forest Service be downsized? (Individual, Sheridan, WY - #1132.93621)

Public Concern: The Forest Service should include the costs of litigating this proposal in agency costs.

The Forest Service failed to assess the cost of litigating this proposal. It is inevitable that litigation will occur if the Forest Service issues a Record of Decision selecting the "Proposed Action."
RELIEF: The Forest Service must include the cost of litigating this "Proposed Action" as a cost to the agency. (County Elected Officials, Basin, WY - #43980.93600)

Public Concern: The Forest Service should select a more prohibitive alternative because of the savings to the agency and taxpayers due to lower implementation costs.

Strict protection of all roadless/unroaded areas also responds to budgetary concerns and the need to balance forest management objectives with funding priorities. It is a well known fact that management that suspends logging and road building and other developments on a National Forest is much cheaper to implement than management that does not suspend such activities. As an example, Alternative 3 (which did not allow logging and new road construction examined for the 1993 GWNF Plan Revision) had by far the least cost to implement of any of the 14 alternatives considered in detail (see page B-100 of GWNF FEIS). Its budget was less than 60% of the budget for the alternative (8A) chosen by the FS to implement. Implementation of Alternative 3 would save the US treasury and US taxpayers over \$6 million dollars a year on this one forest alone. In addition, Alt. 3 had the highest benefit to cost ratio of any of the 14 alternatives (GWNF FEIS B-99). It is therefore reasonable to expect great benefits to the U.S. treasury and American taxpayers to similarly accrue from a prohibition on logging and road building in roadless areas. (Business, Staunton, VA - #29919.93600)

Public Concern: The Forest Service should explain how "overall agency costs are expected to remain the same" under Alternatives 2 through 4 when 60 million fewer acres would be managed.

It seems unsupportable to claim under Agency Costs (page S-19) that "overall agency costs are expected to remain the same" under Alternatives 2 through 4. Although managing 60 million fewer acres, agency costs would remain the same? What would the cost be if they ceased managing all 192 million acres? (Individual, Markleeville, CA - #13284.93630)

Public Concern: Forest Service funding should be increased.

I would like to appeal for increased funding for Forest Service activities, including repair and better maintenance of existing roads that are to be retained. Funding for the Forest Service has continued to decrease, in the face of increasing demands for maintenance, recreational opportunities, forest health, and enforcement issues. Existing roads and trails have deteriorated, and encroachment of disease and undesirable species continues to be a threat. Dumping of trash and illegal use of off road vehicles have become a serious problem, due in part to the Forest Service's limited enforcement and educational capabilities. I would appeal for sustained increases in funding for the Forest Service so that they can continue to do the jobs that we are expecting of them. A side effect of increased funding to the Forest Service would be the betterment of local economies in forest areas. (Individual, Lilburn, GA - #11283.93630)

But your real long-term problem as you shut down use of the forest service to more and more logging, and natural resource industries is how to fund your department. How do you control fires through prescribed burns, as well as take care of insect and disease damage? You do not have the money now to do your job. Where are you going to get the money in the future for managing the forests? When our lands burn up outside of the forests are you going to blame us for having moved there in the first place? Is your dept. simply going to wait for crisis problems to arise and then Congress or the President will step in with general funds or begin large increases in recreational use charges to pay for this management? The leadership of the forest service has decided on major moves in forest service management without finding the funds to do the work and direction they are moving toward. Maybe they simply do not care, in which case they should be fired. (Individual, Augusta, MT - #5488.93640)

Public Concern: The Forest Service should correct the "disconnect" between plans and the alternatives and budgets. Budgets should be presented to Congress on a forest-by-forest basis.

It is essential, if planning is to mean anything at all, that the "disconnect" between plans and budgets be corrected. There have been few if any plans executed as projected. I am amazed that this "noncompliance" with plans has produced so little uproar and so little legal action.

For example, assume that a forest planning effort produced five alternatives for consideration. "Alternative Three" is ultimately selected. However, when funding comes down, some activities projected in the plan are fully funded and others are only fractionally funded--or, perhaps, not at all. This is the legitimate decision of Congress and those at higher levels in the administration that allocated the budget. So the line officer proceeds with a year's management activity on the basis of policy direction set in the budget. Has no one noticed that Alternative Three is not being followed--or does no one care? A new management alternative is being pursued with only some semblance to the selected, legal alternative.

The "new" alternative has neither been analyzed beforehand nor likely consequences revealed to the public. Worse yet, whatever management is taking place is apt to change from one year to the next, depending on the vagaries of the budget. Such does not enhance a smooth operation nor produce a predictable outcome not in terms of resources produced nor in desired future ecological conditions.

It may also be time to present the budget to Congress on a forest-by-forest basis. This could have one or all of several effects. First, Congress would be responsible for the distribution of funds and would get both credit and

blame for budget outcomes. Second, members of Congress with national forests in their congressional districts or states would, of political necessity, become quite interested in those entities. Third, members of Congress would become at least somewhat responsible for those national forests thereby sharing the credit or blame, for such activities. (Timber Association, Medford, OR - #13658.93630)

Public Concern: The Forest Service should assure that conservation dollars are spent for that purpose.

Legislation, such as the Wildlife and Sport Restoration Programs Improvement Act of 2000 is needed to prevent conservation dollars from being spent in ways that do not help conservation. (Individual, Saxonburg, PA - #7503.93600)

7.2.6.1 Fire Control and Fuels Management Costs

Public Concern: The Forest Service should disclose the costs of managing roads versus the costs of fire management.

There hasn't been full disclosure of the economic impacts of managing a forest in this manner. The costs of managing roads need to be weighed against the costs of fire suppression and management by prescribed fire. You are to fully disclose the effect of your preferred alternative and you have failed. You are asking us to comment on a document that doesn't give us full disclosure of the impacts and can't be judged. You may consider this written request for full disclosure. (Individual, Naches, WA - #28371.90010)

Public Concern: The Forest Service should explain how monies collected for removing timber and slash for fire prevention purposes were spent.

We've got places where it's been timbered but the slash hasn't been properly removed and it makes a terrible fire hazard. And there's -- that money's been collected for that purpose. I'd like to know where it's being spent. I'd like to have an audit of that. (Individual, Laramie, WY - #21764.93600)

Public Concern: The Forest Service should update its analysis of the long-term costs of fire suppression versus costs of fuel treatment.

On page 3-151, Figure 3-26's fire trend line terminates at 1995 data. It is common knowledge that since that time, wildland fires on USFS lands have increased, departing from the shown trend line. To base decisions on data which does not reflect reality is dangerous in the extreme. Figure 3-27 on 3-155 has 1999 data, which clearly indicates that the cost per acre of fires is steadily increasing. Extrapolating the 1999 cost/acre/total across average charges show that fire on USFS is soon to exceed a million acres per year at over a thousand dollars per acre, with no end in sight. By contrast, spending that same billion dollars in fuels management, at estimated "loss" or "subsidy" of from \$120 to \$400 per acre, would allow the stabilization of at least two million acres of "at risk" forests per year. Within twenty years, those forests the GAO listed as most at risk could be stabilized. The Forest Service should perform an objective long-term comparison of costs of fire suppression both in and out of roadless areas with the cost of preemptive treatments. (Individual, Whitefish, MT - #30417.42100)

Public Concern: The costs of fire management and regeneration should be subtracted from the value of the timber products harvested to effect that mitigation.

Timber harvest should be a means for fire hazard mitigation. The amount of heavy fuels can only be accomplished through heavy fuel removal. Intermediate fuels hazards should be mitigated by dispersal, chipping or burning under prescribed conditions. These costs along with regeneration should be taken from the value of products removed. If stumpage value does not cover the cost of fuel hazard remediation and regeneration, the product shouldn't be sold until value will cover the cost. (Individual, Pueblo, CO - #2884.93310)

Public Concern: The Forest Service should reevaluate agency costs of fuels reduction and increased fire hazards in roadless areas.

How many acres of roadless areas can you afford to lose to fire--at what cost, expense and damage to other resources WATER, FISH and WILDLIFE WITHIN the area? Are you then jeopardizing their values by lack of FIRE CONTROL by loss of access and absence of road maintenance and reconstruction in these areas?

Do you consider the present fire management resources--skilled people, equipment capable of controlling a fire to the confines of the roadless (or present Wilderness) where access -- roads and trails -- are no longer maintained for fire suppression forces?

If subjected to restricted access, or restrictions on the use of mechanized equipment or chemicals (retardant or suppressants), that allow fire escapes from the roadless areas you and other "fire protection agencies" could be considered liable for damages to other owners' property. (If you have any doubts on how essential access is to fire protection, check with your insurance agent who sets the fire insurance rate for your residence based on location of nearest fire hydrant, fire department.) (Individual, Fox Point, WI - #716.84200)

The analysis on the cost of fuel treatments is very one sided. For example, on the Lewis and Clark NF (Tenderfoot Experimental Forest Timber Sale-1998) about 500 acres were treated by partial harvesting of the timber and about 500 acres are scheduled to be treated with prescribed fire. This will provide fuels treatment for about 3,000 acres. It didn't cost the government a dime, in fact they made money on the project. There are hundreds of such opportunities in roadless lands in the Northern Region. (Individual, Great Falls, MT - #28425.93100)

I am concerned with several aspects of the Roadless act. As a former helicopter fire crew for USFS the difficulty and cost of such "airborne" fire fighting is very high and climbing. (Individual, The Dalles, OR - #7374.93621)

Many acres of forest fuels have traditionally been treated through the use of timber-sale-generated funding. Brush disposal funds are authorized for fire hazard reduction on timber sale areas. An added benefit is often the concurrent reduction of natural fuel loading within the sale area at the same time. It is questionable if the Forest Service will have the funding available, without a viable timber sale program, to conduct any effective fuels treatment program in roadless areas if the "Proposed Action" is implemented. How will the Forest Service replace these funds?

Relief: The Forest Service must address the impacts of less timber sale generated funding for fuel reduction e.g., brush disposal funds. (County Elected Official, Cheyenne, WY - #15902.93600)

This section relies heavily on a fuels reduction program to mitigate the effects of decreased roading and timber harvest. Although the effects analysis acknowledges the substantial increases in costs, no disclosure is made as to where the resources to implement the proposal will come from, e.g., personnel, equipment, etc. Many factors influence the availability of these resources, such as, extended fire seasons, reduced budgets, hiring limitations, and qualifications of people in the fire organization. These are factors that must be addressed and that cumulatively have severe impacts on any roadless area fuels reduction program.

Relief: The Forest Service must address the impacts of these potential shortages necessary to accomplish fuel reduction objectives. (County Elected Officials, Worland, WY - #16185.93620)

On page 3-200 you state that the effects on agency costs from prohibitions are expected to be minor. Those costs will be much higher, especially in those roadless areas where "High Risk" conditions call for large amounts of

money to do "Risk Reducing" activities. Again, your analysis has vastly understated the risk in the roadless areas. (Individual, McCall, ID - #6848.90010)

Public Concern: The Forest Service should lobby Congress for funding to address the issue of thinning in fire prone areas.

I urge the Forest Service to lobby Congress for funding to address the issue of thinning in fire prone areas. If thinning is essential in roadless areas, it can be accomplished by chainsaws, chippers, horse logging. (Individual, Moscow, ID - #14407.93600)

Public Concern: To save taxpayers' money, the Forest Service should harvest timber, not conduct prescribed burnings.

The budget to accomplish this [prescribed burning] simply is not available and is not likely to become available. It is a vast waste of tax payers' resources to pay to accomplish an objective which could be accomplished by logging and at essentially no cost to the tax payers. (Individual, Colville, WA - #8469.93630)

Public Concern: The proposed rule would increase susceptibility to catastrophic fires, which would harm the tourism industry.

The proposed policy leaves our National Forests susceptible to catastrophic fires that would result in air and water pollution and habitat destruction. This would hurt the tourism industry greatly. (Individual, Lewiston, MT - #13917.83310)

7.2.6.2 Agency Costs and the Timber Industry

Public Concern: The Forest Service should not claim that a reduction in harvest resulting from the prohibitions would not likely affect timber prices.

How can anyone in good conscience make the statement: "THE REDUCTION IN NF'S HARVEST RESULTING FROM THE PROHIBITIONS ARE NOT LIKELY TO EFFECT TIMBER PRICES." This is so inane that I don't think that it takes any further elaboration. (Individual, Bigfork MN - #8876.93100)

Public Concern: The Forest Service should analyze the allowable sale quantity potentially generated from each roadless area.

As a member of the timber industry who does business with the USFS in Colorado, particularly on the Grand Mesa, Uncompahgre and Gunnison National Forest (GMUG) and the White River National Forest (WR), I would request that the USFS analyze the following items for each of the roadless areas...identified in this Roadless Area Conservation Proposed Rulemaking change: Allowable Sale Quantities potentially generated from these specific areas (Timber Industry, Montrose, CO - 13091.70000)

Public Concern: The Forest Service should address "below cost" timber sales.

"Below cost" sales can be addressed by concentrating resources on the highest site lands, at relatively low elevation, with the most gentle topography, with second-growth managed stands and extant road system and minimal environmental risks. But given the time cost of money, it is a ludicrous gamble to invest the money necessary to achieve high levels of productivity of wood if there is no reasonable certainty that the trees will ever be harvested. For example, an initial investment of \$500/acre at 7.2 percent interest would have to return \$128,000 at the end of an 80-year rotation to break even.

If the national forests are to be expected to produce timber, there is a "Hobson's choice" to be addressed. The best chance to economically grow timber is on low-elevation, high-elevation, high-site lands, with relatively gentle topography, already stocked with managed stands and easy to access for recreation, etc. Yet, over the long term, these sites are also apt to be the most biologically productive of both biomass and biodiversity.

The alternative is to practice more extensive, or opportunistic, timber extraction from higher elevation, lower site lands, in steeper topography, with higher environmental risks to disturbance, with lesser capability to produce biomass and with reduced biodiversity, likely to produce sales that are "below cost," and more difficult to access. Which way to go? Otherwise, it makes little sense to make such investments and just accept whatever happens in the natural course of events.

The only way that I can see to solve that Hobson's choice is to zone the highest site lands with the lowest potential for environmental damage from stand treatments and roads for emphasis on timber production. Zoning has been applied to wildernesses, wild and scenic rivers, recreation areas, etc., with some success. Why not zone timber production areas? This does not mean that multiple-uses would not take place on those lands. It does mean that such lands would be managed primarily for the growing and harvesting of trees in a sustainable manner. These lands could be identified through planning, and then established by law or some other mechanism to ensure ability to capture return on investment.

If that were to be the case, the question is begged as to whether these timber-emphasis lands should remain in public ownership. Would it be better to trade those lands to the private sector in exchange for more acreage with lower timber values, but with higher values for watershed, recreation, visual beauty, and fish and wildlife values? (Timber Association, Medford, OR - #13658.93340)

One of the more popular political ploys employed in the efforts to resist proposed land management activities is the issue of "below cost" management activities--primarily forest stand treatments and livestock grazing. These ploys work well in influencing public opinion. But such grossly simplify very complex issues.

This complexity results largely from the rules on how to keep accounting records. The best example is the controversy over "below cost" timber sales. Given the bookkeeping rules and the vulnerability of the proposed timber sale to legal action and political activity, it is increasingly unlikely that a timber sale will "make money." Consider the following scenario: suppose that payments of 25 per cent of gross receipts are replaced by "tax payments." This "cost" of a timber sale is eliminated. Further, suppose that trust funds, such as Knutson-Vandenberg funds that set aside a percentage of gross receipts for future stewardship actions, no longer exist. Then consider that some portion of the cost of the associated roads involved is marked off against recreation. Most of the recreational use of national forests is associated to some degree with forest roads, most of which were originally constructed to facilitate timber sales.

Finally, what if other actions, such as fuels reduction or thinning or production of a desired wildlife habitat condition, are an objective of the prescribed stand treatment, i.e., the timber harvested is only one of several purposes for the management activity and some appropriate allocation of costs to other benefiting functions are marked off accordingly? Such stand management activities are being referred to as "stewardship" sales in which the timber harvested pays for a portion of the costs and some remaining portion of that cost is appropriately charged to the attainment of other values. For example, if significant costs are incurred to carry out stand management to reduce the danger to homes and human life in the forest/urban interface and the commercial material removed recovers only half the costs, is that a "below cost" activity?

The result of these changes would be that more, if not most, such management activities would be closer to being "above cost" so far as the timber extraction aspects are concerned. The most significant part of the calculus that determines whether such a management action is above or below costs are the rules set for making the calculations. It is also well to remember that some stand management activities, say pre-commercial thinnings, will almost certainly be "below cost" activities when, in reality, they are an investment in achieving a future desired condition. In other words, such actions are an investment.

Changing the accounting rules, as mentioned, would produce a different "bottom line." That coupled with the fact that all receipts would go to the treasury (sans trust funds), would change the picture--and the bottom line. To the extent that cost/benefit assessments are germane, it is well that the evaluation be as reflective of reality as possible. In my opinion, the present procedures are "wacko," are subject to manipulation for political purposes, and badly need to be reconstituted.

Timber sales made entirely for purposes of providing wood to the market at "below costs" are another matter. Such sales provide benefits to a select geographically defined segment of the population. There may be policy reasons for such activities, including support to local communities and industries and maintaining downward pressure on prices for wood products. The extent to which such actions are deemed desirable is a question of policy. Congress and the Administration should determine such policies--not the FS. (Timber Association, Medford, OR - #13658.93630)

Public Concern: National forest timber should be sold "when the price is right" and not offered on a set schedule.

If there is any intention for the national forests to produce a significant amount of wood for use of the American people, it is essential that there be a clear direction from Congress and instructions from the Administration to do so. The best means of producing wood on a predictable schedule and at a particular rate depends on reducing or managing the variables that impinge on management action. Such factors as markets, insect outbreaks, droughts, and fire cannot be fully mitigated. Non-declining even flow of timber to market no longer seems a viable objective. Timber should be sold "when the price is right" and not offered on a set schedule. No other owner of timber would market wood on a regular schedule regardless of demand and price. When FS timber is put "on the market" on a regular schedule that is oblivious to market demand and allows leeway to buyers as to when the timber is cut, this encourages speculation among buyers, who may delay cutting the timber until an economically advantageous time. And history shows that Congress has been willing to shield speculators with "buy backs" when things go sour. Instead, sales could be prepared and "put on the shelf" until an appropriate time for marketing. Cutting can be required by a time certain. For sake of work-force stability and efficiency, sales can be prepared on an "even flow" basis and more opportunistically marketed. (Timber Association, Medford, OR - #13658.93340)

Public Concern: The Forest Service should sever the link between agency funding and timber harvest.

Alternative funding for the Forest Service needs to be established to sever the link between funding and commercial logging of sensitive areas. The Forest Service needs to manage the forests as the legacy that they are, not farm them for the financial well-being of the Forest Service. (Individual, Monticello, IL - #3262.93310)

Some local entities, especially school districts, depend on timber revenue for their taxes. If it is determined that the federal taxpayers should support that district, they should do so without linking the payment with any activity on the federal land. (Individual, Bakersfield, CA - #974.93740)

Alternative 4 should be the selected alternative because of the perverse incentives inherent in the Forest Service's commercial logging regime. If stewardship logging is allowed, then the Forest Service will be encouraged to do timber projects in roadless areas using the same old tools that they have used for decades to mess up our forest. All of the off-budget accounts encourage the Forest Service to generate income that they can skim money from. Generating income requires big trees, precisely the trees that must be retained in the ecosystem to protect the values of the roadless areas. Helicopter logging and cable logging, since they are more expensive than ground-based logging, also tend to reward timber sale planners for taking the big trees and leaving the smaller trees, which is precisely the opposite of what stewardship of our forest currently requires. (Environmental/Preservation Organization, Eugene, OR - #55101.93300)

Public Concern: The government should not be in competition with private individuals.

Stopping logging in these areas will improve the price private landowners get for their timber. The government should not be in competition with private individuals. (Individual, Harris, NC - #5300.93000)

Public Concern: The Forest Service should consider that timber harvest plays a very small role in the economy.

I seriously doubt that building roads into roadless areas is hurting or going to hurt the economy. There is a very savvy economist here in Western MT, who can explain how the decrease in timber harvest has not hurt small Western MT communities. The population of these communities has actually increased by a healthy percentage over the last 14 or 15 years. He uses fractions such as total number of acres of timber, number of logs taken off public lands, and percentage of economy each log represents to show what a drastically small part of the economy these logs play. So, please keep what is left alone, before it is all gone! (Individual, No Address - #8690.93200)

Public Concern: The Forest Service should establish funding for seeding trees and restoration work.

Maybe as an incentive for logging companies a federal fund for seeding trees could be set up to promote sustainable logging procedures for previously logged areas. (Individual, No Address - #1732.93644)

There are two major reasons why restoration has had much discussion and little action. First, the Forest Service simply doesn't have the budget to do the necessary preparation work, and second, the required regulations and procedures are too cumbersome and complicated. What is most needed are adequate Forest Service budgets and a streamlining of procedures. (Individual, No Address - #6299.93630)

Public Concern: The Forest Service should examine the cost/benefits of revegetating, stabilizing, and maintaining logged areas.

Some of the potential benefits of the proposed rule are highlighted. Could another benefit be being able to concentrate efforts on revegetating, stabilizing, and maintaining logged areas to bring them to maturity more quickly? Agency savings are indicated "up to \$565,000 per year." Is this nationwide or by forest or how? What are some of the disadvantages? How do the benefits compare to the disadvantages? (Individual, Moses Lake, WA - #718.84600)

Public Concern: Costs of timber sales must include Environmental Impact Statements, road building and maintenance for the life of the road, loss of recreational revenues, and costs of water purification.

Private lumber interests should not be subsidized through below market sale of public lands. Costs of sales must include Environmental Impact Statements, road building & maintenance for the life of the road, loss of recreational revenues, costs of water purification. (Individual, Missoula, MT - #11065.93644)

Public Concern: The government must accept the responsibility for stopping extractive practices and find the money to pay for the damage already done to the environment.

The question of how to pay for this always comes up. The legislative and the executive branches of government have actively allowed environmental excesses in our national forests by loggers, miners, and livestock grazers for many decades. They must now accept the responsibility for stopping such practices and find money to pay for the damage already done. (Individual, Weiser, ID - #5183.84600)

Frankly I wish there were more Draconian laws that would limit the access of logging companies. Laws that would require you to pay all expenses related to the harvesting of timber as well as additional related costs. In addition, I believe that monies should be collected and kept in trust as a long-term environmental insurance to pay for environmental cleanup in the event that companies close up shop. One resolution might be to have the logging companies pay all fees for maintenance of, and public access to the national parks. (Individual, Carlsbad, CA - #2265.93000)

Public Concern: The General Accounting Office should perform routine inspections to keep the Forest Service “on track” and inform the public about the economic viability of Forest Service timber harvest activities.

Follow-up inspections by GAO should be routine to keep the Forest Service “on track.” The public has a right to be kept informed on the “economic viability” of the Forest Service timber harvest activities. (Individual, Sitka, AK - #26851.93600)

THE FOREST SERVICE SHOULD BE HELD MONETARILY ACCOUNTABLE FOR THEIR FINANCIAL REPORTING ACCURACY

We recommend that the Forest Service employ a new management direction, which would require the Forest Service to be held monetarily accountable for their financial reporting accuracy. We believe that accurate records should be made available to the public.

We recommend that the Forest Service employ a new management direction, which would require that funding for planned projects, connected activities and maintenance be guaranteed in advance of the project proposal. Promising or suggesting that future, necessary emphasis of projects will be done, even though funding is not available, does not constitute full disclosure. (Environmental/Preservation Organization, Weldon, CA - #16041.93600)

7.2.6.3 Subsidies

Public Concern: The Forest Service should eliminate subsidies for extractive industries.

I have been a homebuilder for decades. I know that lumber prices will go up under any type of cutting reduction. So be it! In reality the taxpayers of this country have subsidized timber companies and homeowners by selling timber for less than full value, at least when roadbuilding is thrown in. Worse, we have subsidized Japanese and other foreign interests by roadbuilding while shipping logs overseas so they can have cheap lumber. Often they process our logs and sell the product back to us. (Individual, Bandon, OR - #2910.93000)

The National Forest Service timber sales and resultant road building have been nothing but ‘corporate welfare.’ (Individual, No Address - #17.93300)

We also suggest that fees for companies harvesting trees in National Forests be increased. (Individual, Walhalla, SC - #7350.93000)

A prohibition on all logging in roadless areas, including those in the Tongass, would result in only a 7% reduction in the Forest Service's planned timber sale program. The wood harvested from these areas, most of which is shipped overseas with the absolute minimum of processing, is obviously not critical to the needs of this nation and is nothing but a subsidy for the large multinational timber concerns. (Individual, Springfield, VT - #7499.93340)

I'm questioning the logging now taking place all over America and especially in our national forests where logging practices are harmful but are actually costing taxpayers money. (Individual, Greenwich, CT - #924.93300)

I do not believe that the proposal goes far enough in preserving national forests. It has several flaws, among which are: IT'S COSTLY – we've recently seen that building such roads does not make economic sense; the revenues from logging do not even cover the roadbuilding costs. Why should private logging companies get a subsidy in order to harvest timber from lands they don't even own? (Individual, Seattle, WA - #203.93300)

I'm tired of the government, both federal and state, subsidizing logging, grazing, and mining for the benefit of a few, at the expense of the general public, who get a degraded environment plus the bill. (Individual, Alamogordo, NM - #1086.93600)

It is a great pleasure to see the Forest Service slowly recognizing that the American people no longer see its mission as subsidizing the timber industry. Road-building and other services to the timber corporations should be paid for; deficit operations must be stopped. (Individual, Berkeley, CA - #1005.93600)

THE BENEFICIARIES OF TIMBER HARVESTS SHOULD SHOULD THE MAJOR COST OF ROAD CONSTRUCTION, MAINTENANCE, AND RECONSTRUCTION

I believe the beneficiaries of the timber harvest should shoulder the major cost of constructing and reconstructing access roads to these areas. (Individual, Bozeman, MT - #320.21200)

I am concerned when existing roads are not maintained thus resulting in a bypass situation i.e. a new road (perfect example of this is the Monument Peak Area).

Has anyone ever attempted to have road construction for logging to be paid for (IN CASH) by those doing the logging but under ABSOLUTE control of the Forest Service? (Individual, Great Falls, MT - #6430.93610)

The Roadless Area Conservation Rule should include provisions for the removal of many of those roads which were bladed as subsidies to the logging industry at public expense. If possible, the logging industry should pay for their removal. (Individual, Albuquerque, NM - #10780.84610)

TIMBER COMPANIES RECEIVING SUBSIDIES SHOULD GO THROUGH THE OFFICIAL PROCESS OF GOVERNMENTAL REVIEW AND OVERSIGHT

The fact that road costs are paid for by the taxpayer for the benefit of logging companies is an unofficial subsidy. If timber concerns are to receive subsidies, it should go through the official process of governmental review and oversight. Withdrawing road expense support will also help the American lumber industry become more competitive. There are numerous examples, from automobiles to electronics, where industries have benefited in the long run from reduced government support. (Individual, Richmond, VT - #10718.93644)

Public Concern: The Forest Service should recognize that forest roads are not a subsidy to the timber companies.

The comments about the agency subsidizing logging on NFS lands need careful evaluation. The Forest Service is the only major marketer of timber that does so at "below cost." Agency activities are often far above the costs of others that sell timber. Forest roads were never a subsidy; purchasers paid more for timber where access was in place. A careful examination should be made to see if recreational use (90% of all forest road users – page 3-13) has been subsidized. (Business/Business Association, Washington DC - #29962.93300)

Public Concern: The Forest Service should address costs for recreational use of National Forest System lands.

It is said that this action responds to budgetary concerns and the need to balance forest management objectives with funding priorities. If it is the concern of the Forest Service to abandon costly and unrewarding ventures, then it is recreation that must be abandoned. The cost per recreational visitor day on the forest is \$1.07 while the revenue garnered by the Forest Service for this use is 14 cents per day. Annual losses due to recreation are estimated at \$355 million while losses due to logging are estimated at \$290 million. Any claim that the present initiative is budget based is hollow if there is not an accompanying reduction in recreation expenditures or an increase in revenues from that use. (Municipal Association, Price, UT - #85.93645)

Tenth, the purported agency cost savings rest on so patently false an accounting gimmick that it should be laughed out of sight. The roads in question are defined as expense entirely, and apparently almost all costs of administering the lands are charged against timber sale and road maintenance. When timber administration ceases, will the losses of managing public land then be charged against dispersed recreation? And when it is shown that each back-country hiker costs the Forest Service \$200 plus the costs of emergency evacuations, will dispersed recreation in its turn be banned? (Individual, Wolcott, VT - #17326.93100)

Public Concern: The Forest Service should encourage and subsidize the use of recycled rather than virgin fibers for paper production.

I would like to add a note about subsidizing the making of paper from virgin lumber when it would be better for the environment to make it from recycling. It does seem to me it would serve more people better to subsidize the recycling instead. (Individual, Minoa, NY - #4670.93350)

7.2.6.4 Cost of Roadless Area Conservation Proposed Rule

Public Concern: The Forest Service should analyze and disclose the amount and source of money used for the Roadless Area Conservation Proposed Rule.

I find it ironic that the USDA is stating that they have no money to maintain roads but has found the money to do this endowment of the Forest Service Roadless Area Conservation Proposed Rule to the tune of \$54 million across the nation. (Individual, Yellow Jacket, CO - #3295.93621)

COMMENT: General--The estimates in early spring of this year were that this proposed rule making was to cost between \$7,000,000 and \$10,000,000. The funding for this process has been passed on to local National Forests. Forests were required to return funds allocated by Congress for local resource management and planning. This has had a direct impact on local national forests' ability to provide goods and services for FY2000.

RELIEF: The Forest Service must completely disclose the actual costs of this rule making process and an accounting of how unappropriated funding was found to pay for it. Also, the Forest Service must disclose the effects of what resource and planning activities were not accomplished in Fiscal Year 2000 as a result of the Roadless Area conservation effort. (County Elected Officials, Basin, WY - #43980.93600)

I am in receipt of your useless, expensive two volumes of Draft Environmental Impact Statements on Roadless Areas. Who on earth would read those? As a taxpayer, a citizen of the U.S., a senior citizen, and a cabin lease holder, I want to know the cost of that publication: salaries, printing, the accompanying map, and the mailing. As most government expenditures I'm sure it is outrageous. I have a right to know. I'm sending complaints to my congressmen. (Individual, Livingston, MT - #3225.55300)

TO ACQUIRE PROPERTY AND RIGHTS-OF-WAY

We are confused as to how the Forest Service has overlooked the cost of acquisition of private property rights of access, rights of way and any land acquisition requirements for the implementation of this Roadless Areas Conservation policy. There would appear to be additional cost of road construction and maintenance shifted to counties and states, and therefore, to private landowners and local taxpayers. (Timber Association, Beaverton, OR - #52230.93600)

TO OFFSET THE COSTS INCURRED DUE TO LACK OF MANAGEMENT ACCESS FOR WILDFIRE AND FOREST HEALTH

A highlight of the lack of analysis of the environmental and economic cost of this proposed Roadless Areas Conservation policy relates to access to manage for wildfire and forest health treatment as identified in this DEIS as a "cost" of implementation of the Preferred Alternative. There is no funding proposal in the FY 2001 Forest Service Budget request or in the FY 2001 Interior and Related Agencies Appropriations that adequately addresses the high cost of such a proposal. We expect to see a full cost analysis of this aspect of funding in the next draft of the DEIS. (Timber Association, Beaverton, OR - #52230.93620)

Public Concern: The Forest Service has been budgeted too much money.

After reading and rereading Volumes I and II of the Draft Environmental Impact Statement, it is apparent that the Forest Service has been budgeted far too much money. Any Government Agency able to spend resources on this worthless claptrap obviously has access to more funds than it can deserve. (Individual, Gold Creek, MT - #8881.93600)

Public Concern: The Forest Service should not spend taxpayers' money on the proposed rule. It should be spent at a local level.

I have to admit that I am more than a little frustrated with the sheer amount of rules, regulations, regional plans, and other initiatives the Agency has undertaken. This frustration is compounded by a lack of coordination amongst these initiatives, and what I perceive must be a tremendous amount of fiscal resources tied to producing initiatives instead of work on the ground. Though we have requested information regarding the cost of these various initiatives we have yet to receive it. But I note that the Washington Office budget of the Forest Service has increased by \$200 million over the last three years. The Agency has increased spending on national priorities by 47 percent since 1998. Field staff within the Agency tell us that resources they should have in place on the ground are tied up because money is not being released from the Washington office. A good example of this comes from firefighting spending. The SAF worked diligently to explain to Congress that the Forest Service needed increases in funding for their fire programs. This is no doubt true, and will be for years to come. I am happy to say that the Congress responded last year by increasing appropriations for preparedness by \$33 million. The problem is that the money does not appear to be getting to the ground. In Fiscal Year (FY) 1999 the Forest Service had access to 865 engines, 86 bulldozers, 51 helicopters and 8160 firefighters. In FY 2000 the Agency has 10.2 percent fewer engines, 13.9 percent fewer bulldozers, 5.8 percent fewer firefighters, and one additional helicopter. Now either that is one expensive helicopter or the money is not getting to the ground. (Mining/Oil Company or Organization, Denver, CO - #29952.93630)

I have a cabin lease I've held for 42 years in western Montana. I'm being driven into selling it because the National Forest Service is increasing the cost of that lease by 400%. If you wouldn't spend money on publications like this, I'm certain you wouldn't need to steal my cabin. This is outrageous to appropriate money for such mailings. You could far better put it into forest management, wildlife management, ranger salaries, etc. (Individual, Livingston, MT - #3225.90330)

Why is this in my best interest? Why are you spending my tax money on any of this proposal, meetings, etc.?
(Individual, No Address - #153.93641)

The millions of dollars spent doing this DEIS would have be better spent on the ground doing road maintenance. (Individual, McCall, ID - #7575.93610)

As I read through the possible alternatives listed from the Federal Register extraction, I am wondering why we are wasting the taxpayers money on this process when there are facilities out there that need to be maintained so we can have our FS managers manage the lands as professionals. Public servants that represent the entire public. (Individual, Chico, CA - #10596.93610)

All we're doing is we're printing all these books and spending all the money. You can read everything in the book and all it takes you is around and around in a circle. The people of the Forest Service are wasting the taxpayers' money by doing all this. And it says the Administration is wanting all this. (Individual, Coeur D'Alene, ID - #21429.93600)

Public Concern: The Forest Service should consider tax-based funding in order to pass this proposed rule.

I personally would gladly be taxed to see that this proposal flies. (Individual, Garland, WY - #6558.93641)

7.2.6.5 Funding for Monitoring and Enforcement of Regulations

Public Concern: The Forest Service should explain where the money will come from to fund law enforcement and manage projects created by the roadless policy.

The Roadless policy will create more projects management, law enforcement requirement. Where will the money come from, who will fund this? (Individual, Tucson, AZ - #13310.90000)

Public Concern: Forest Service funding should be increased so that the agency can effectively manage and enforce existing laws.

It's my opinion that the Forest Service does a great job now with the diminished resources that it's been stuck with. If we would just give the needed resources to the Forest Service, I believe that they could manage and enforce the laws already on the books and almost make everybody happy. Over the years the Forest Service funding has shrunk to a point where their effectiveness has been seriously hampered. (Individual, Bonney Lake, WA - #1748.41200)

One of my friends in Lowman, Idaho is a Logging Administrator for the Forest Service, and tells me many stories of how difficult it is to enforce logging regulations on loggers. Of course there are good intentions of enforcement, but with continual budget cuts, these departments and people cannot actually enforce the regulations because they are spread too thin. (Individual, North Charleston, SC - #8277.93600)

Public Concern: The Forest Service should ensure adequate, regulated access in order to mitigate the costs of the enforcement required to prevent user created roads and trails.

If public lands continue to diminish, eventually, we will start seeing individuals just blazing their own roads and trails and making their own campsites....There is never going to be enough money to hire enough Forest Service personnel to make sure this does not happen. What are you going to do? Call out the National Guard! It will be

much less expensive to provide adequate, regulated public access in the first place. (Individual, Salem, OR - #6294.93611)

7.2.6.6 Cost and Funding of Forest Travelway Infrastructure Management

Public Concern: The Forest Service should explain whether the interim moratorium on no road building or maintenance saved money.

The interim moratorium of no road building or maintenance was supposed to save money, but has it? (Individual, Santa Fe, NM - #9442.92000)

Public Concern: The environmental analysis should include, at a minimum, a detailed accounting of the purported \$8.4 billion road maintenance "backlog."

The environmental analysis should include, at a minimum:

-a detailed accounting of the purported \$8.4 billion road maintenance "backlog" including how that figure was determined, how much of that "backlog" is on each of the national forests in Region 2, what items are included in that figure, and a comparison of the Forest Service's request for Road Maintenance funding and the Congressional Appropriations for Road Maintenance for the past five years. (Timber Company or Organization, Rapid City, SD - #15900.93611)

5th PARAGRAPH - \$8.5 billion on 386,000 miles is over \$21,000 per mile. On many forests, you could build brand new roads for less than that amount/mile. IS THIS THE BARE BONES NEEDS OR SOME KIND OF WISH LIST??? PLEASE EXPLAIN HOW THIS AMOUNT OF MONEY WAS ACTUALLY DERIVED AND TELL US WHAT IT REALLY INCLUDES AS MAINTENANCE AND RECONSTRUCTION? ALSO, HOW DO DETERIORATING ROADS THAT CAN'T BE TRAVELED BY CAR CONTRIBUTE TO WILDLIFE CONDITIONS -- DO YOU REALLY MEAN FISHERIES AND AQUATICS BECAUSE IF YOU DO THEN YOU ARE MISLEADING US WITH THE MORE GENERAL TERM OF WILDLIFE? (Individual, Darby, MT - #27855.93611)

Public Concern: The 8.4 billion dollar backlog figure is exaggerated and often used out of context.

The road maintenance argument sounds good on paper. However I believe that the 8.4 billion dollar backlog figure is flawed. I believe it is an exaggerated figure. I was personally involved in the road maintenance backlog inventories. My greatest fear was that the backlog figure would be taken out of context and used as a sound bite to further the political agenda in Washington, DC. Apparently that has happened. (Individual, McCall, ID - #7575.93610)

Public Concern: The Forest Service has the funding to maintain its 380,000 mile network of roads; it just need to set its priorities straight.

The original claim for the need for this roadless initiative was that the Forest Service does not have the funds to maintain its 380,000 mile network of existing roads. Yet over the last ten years the Washington Office budget (of the Forest Service) has increased 149% from \$121 million to \$302 million. During the same period nearly all forests' budgets have decreased, some more than 50%, and more than 5,000 jobs have been eliminated at the Forest and District levels. So the "money issue" is simply a matter of priorities. (Individual, Markleeville, CA - #13284.93610)

Public Concern: The Forest Service should address the Watershed Improvement Needs Inventory backlog.

Proposing to build any new roads for any reason when there is an \$8.4 billion dollar road maintenance and reconstruction backlog is unconscionable and an impossible situation to continue. Besides the \$8.4 billion dollar backlog for road maintenance, there is the Watershed Improvement Needs Inventory (WINI) which represents the backlog of rehabilitation and restoration projects needed to repair damage to the watershed and ecosystem, in the form of gullies, slides and hillside collapses. This ecosystem damage that the WINI projects would repair is a result of logging, roadbuilding, and other management and natural actions. The DEIS fails to disclose the massive amount of WINI backlog that is probably many times larger than the maintenance backlog. (Environmental/Preservation Organization, Weldon, CA - #16041.93611)

Public Concern: The Forest Service should assure funding for continued road maintenance.

I urge you to keep open and make available funds for the maintenance of roads and trails in public lands for use by responsible families. We enjoy riding motorcycles together as a family and support the maintenance of these roads. (Individual, No address - #2370.93610)

I would like to see the Forest Service maintain and improve the roads they have at present before they begin to build new ones. The Forest Service is always saying we cannot afford to keep these logging roads open to the public, they do not have the budget, and the roads are not safe, etc. – anything to just keep the roads gated so the Forest Service still holds the golden key – so when another sale comes along, they have a road ready to go. (Individual, Noxon, MT - #3405.93610)

We are a great nation that seems to always have lots of money for foreign aid – How about our own Forest Service getting the money they need to properly maintain our system as it is? (Individual, Buena Vista, CO - #3299.93610)

Public money would be better spent maintaining our current infrastructure rather than building expensive new roads into roadless areas. (Individual, Provo, UT - #8058.93611)

I am concerned about how the Roadless proposal will impact Los Padres National Forest. Explain to me why this proposal is not just a fluff cover-up to solve the problem of an inadequate road maintenance budget. I have no problem with banning new road construction, but strongly oppose the maintenance/reconstruction provisions. (Individual, No Address - #7662.93610)

We're looking into economic development. If the road's going in there, then we should have a toll. Not for the tribe itself, but for the forest and the roads and the maintenance of it. (Individual, Duchesne, UT - #21984.93610)

We suggest the agency use funds allocated through the Land and Water Conservation fund or other funding mechanisms to apply to the road maintenance backlog instead of buying and removing land from the tax rolls to add to the national forests. (Range/Grazing Organization, Olympia, WA - #28669.93611)

SPEND TAXPAYER FUNDS ON ROAD MAINTENANCE AND OBLITERATION

The FS is not maintaining the 380,000 miles of roads they are responsible for. I want NO NEW roads and I want the FS to spend the taxpayer funds they are allocated to both eliminate some current roads and to maintain others especially to minimize the destructive flooding that occurs when water collects on a roadway and then breaks through at a low spot. (Individual, Spokane, WA - #8989.83130)

ASK COUNTY, STATE OR FEDERAL HIGHWAY PROGRAMS TO MAINTAIN OR ACCEPT ROADS

The fact of not having enough money to keep up on road maintenance is not a reason to close or stop people using roads that were established years ago. A good way to provide funds for dirt road and trail maintenance is to get county, state or federal highway areas to maintain or accept roads. (Individual, Spring Valley, CA - #9729.93610)

With most of the States collaborating with the Forest Service in regards to off highway trails and programs either voluntarily (green sticker program) or mandatory (gas tax or other tax), what will happen with the fees and funds received from these programs? (Individual, Flagstaff, AZ - #18542.93640)

Public Concern: Lack of funding for road maintenance should not be used as an excuse to prohibit road construction or close roads.

The current lack of funding for road maintenance in itself is not sufficient reason to create 40-60 million acres where roads will be prohibited. (Individual, McMinnville, OR - #739.93610)

It's shocking to hear of the \$10 billion budget short fall needed to perform maintenance on existing roads. It is unfortunate that you are using the shortfall situation to help rationalize the elimination of roads as a management tool. (Individual, Boise, ID - #1044.93610)

THE MAINTENANCE BACKLOG CANNOT BE USED AS AN EXCUSE FOR THE AGENCY TO ABANDON ITS REPOSIBILITIES. The draft EIS and proposed rule attempt to cite the current maintenance backlog as a reason for the permanent road building ban. This is the same excuse that was given for the moratorium on roadbuilding that went into effect earlier. Even if for the sake of argument we concede that the lack of funds was a valid reason for the moratorium, it is not a valid reason for a permanent ban. As one possible solution to the agency's dilemma, we suggest the agency use funds allocated through the Land and Water Conservation Fund or other funding mechanisms to apply to the road maintenance backlog instead of buying land to add to the national forests. (Business/Business Association, Bozeman, MT - #43196.93611)

One of the foundations justifying this action is the lack of maintenance of the existing road system. This administration has let that system fall into disrepair by failing to ask Congress for adequate funding and virtually eliminating all logging activity, another major source of maintenance funds. They created the situation, then used it to leverage road closures and bans. (Individual, Salt Lake City, UT - #13528.93600)

Public Concern: Where maintenance costs are prohibitive, the Forest Service should consider posting some roads as unmaintained, with travel at one's own risk.

Maintenance costs may be prohibitive. If they are not part of a necessary transportation system, many roads could be posted as not maintained with travel at your own risk. Forest Service roads in our areas were recently graded. The roads were easily drivable and grading served little purpose, an example of wasteful use of maintenance money. (Individual, Noxon, MT - #3406.93610)

Public Concern: The Forest Service should acknowledge that in the past road maintenance was provided by timber sale purchasers.

The Forest Service bemoans the fact that they do not receive adequate road maintenance funds to maintain their established road systems. During the years that an active timber sale program was in effect, the Forest Service performed very little road maintenance. Timber sale purchasers provided the vast majority of maintenance on Forest Service roads as part of their contractual obligations. This maintenance was probably performed to a much higher standard than the Forest Service can provide with appropriated funds. (Individual, Kooskia, ID - #6765.93610)

Public Concern: The Forest Service should correct its estimate of the savings from reduced road maintenance to reflect recent expenditures on roads.

Among the many projected benefits of the proposed rule are anticipated Forest Service cost savings of up to \$565,000 per year from reduced road maintenance. This is an erroneous figure and highly misleading. Recent road maintenance cost expenditure has been significantly less than this figure due to lack of administrative recognition of need and funding for this important resource management item. (Environmental/ Preservation Organization, Twain Harte, CA - #50955.93610)

Public Concern: The Forest Service should address the relation between its lack of funding for road maintenance and continued funding for international forestry programs.

The purported lack of funds [for road maintenance] is also aggravated by the vast sums spent in foreign countries under the International Forestry Programs, and in setting up and implementing such programs as the UNEP's "Systematic Agenda 2000." (Global Biodiversity Assessment, UNEP, pg. 10) These types of preferences and expenditures are a significant part of the agency's fiscal and management problem, and in particular, the international programs and projects. This administration finds vast quantities to spend in foreign countries but cannot meet its domestic obligations. When these choices and actions are combined with inflation and the depreciated purchasing value of the existing paper and credit systems, it creates an absurdity which is destined to failure. The proposed rule(s) will not resolve these continuing management problems. (Individual, Douglasville, GA - #18185.93610)

Public Concern: The Forest Service should disclose the funds spent on road obliteration.

Road obliteration creates new roadless areas and wastes millions of dollars of construction investment as well as destroying portions of the National Forest Transportation System. How many investment dollars have been wasted to date? (Individual, Kooskia, ID - #6765.71300)

Page 3-16, Alternative 1--The discussion states that road decommissioning would continue to increase nationwide. The question is "How much funding is being spent on road decommissioning that could, instead, be used for road maintenance to offset the backlog identified?" This creates a perception that the Forest Service is more concerned about eliminating roads than seriously resolving the maintenance backlog problem:

RELIEF: The Forest Service must disclose how much funding is being allocated to road decommissioning and compare it to road maintenance needs. (County Elected Officials, Basin, WY - #43980.93600)

Public Concern: Closing roads or restricting motorized access would negatively impact the economy.

My husband and I own a service station in Challis [ID]. We are concerned about the economic impact on our business if you are allowed to continue to close roads. Our livelihood and the jobs of all the people who work for us are at stake. (Business/Business Association, Challis, ID - #6685.93730)

Without access by roads (plus no timber sales), our community cannot depend on the income from TOURISTS, especially if these roadless areas stop snowmobiling, hunting, ATV riding, and even mushroom-picking, etc. (Individual, Cascade, ID - #736.93700)

To hear environmental groups continually target us by saying we ruin the land is very misleading, and many trails that are in existence and are now used by all user groups were built and maintained by ORV clubs, and the ORV industry is a multi-million-dollar industry in the United States alone, and banning or severely restricting them would be a large economic loss. (Individual, Andover, CT - #933.91712)

We feel that the small communities and businesses in the areas we ride would be adversely impacted if parts of the forest were forbidden. (Individual, Grants Pass, OR - #931.93200)

Public Concern: The Forest Service should maintain trails to avoid hurting the economy.

And "yes" not maintaining these trails does hurt the local economy in small ways! (Individual, Dover, MN - #7663.93200)

Public Concern: If the Forest Service lacks funding, they should allow roads to decommission naturally, or by gating or placing ditches across them.

If there is no money to manage the forest roads then where is the money coming from to decommission roads and have a roadless proposal? It seems that one ditch, a gate, or just letting the roads grow back would be a much cheaper alternative for decommissioning roads. (Recreational Organization, Vancouver, WA - #11361.93600)

Public Concern: The Forest Service should consider the negative impacts of roadless area designations on usable Forest Service roads and the Purchaser Road Credit Program.

Listed below are negative effects that will occur from this [the roadless proposal] action. One of the principal ways to maintain the forest roads was through the Purchaser Road Credit Program (PRCP). The Roadless Area designation will mean a loss of useable Forest Service roads at a reduced cost. (Individual, Two Harbors, MN - #8392.93645)

Public Concern: The Forest Service should not spend funds building roads into all roadless areas just to make it easier to fight wildfires.

...since there are currently no roads into roadless areas, how could fire fighting be made any more difficult than it already is? Are we to expect the Forest Service to punch roads into all our roadless areas, to the tune of millions of dollars, just in case there's a wildfire? How absurd. (Individual, Idaho Falls, ID - #6836.84100)

Public Concern: The Forest Service should explain who finances the design and planning of logging roads.

Does the FS still finance all the design & planning of logging roads? If so, stopping this financing would end the road construction pretty quickly - and end the pollution of mountain streams with run-off from road construction & timber harvest methods. (Individual, Wendell, ID - #5849.93600)

Public Concern: Any funds saved by ceasing maintenance of roads should be used for other management activities.

FOR ALLEVIATING THE ENVIRONMENTAL IMPACTS OF ROADS

I...support efforts to end maintenance of roads in as many national forest areas as possible. Any USDA funds saved by ceasing maintenance of roads should be put into alleviating the effects of these roads (erosion, etc.). (Individual, Plano, TX - #2231.64400)

FOR FACILITIES UPKEEP

The money spent on road maintenance should be spent instead on facilities upkeep. (Individual, Salem, VA - #902.93610)

FOR UPGRADING EXISTING FOUR-WHEEL DRIVE ROADS AND EXPANDING FACILITIES FOR THE HANDICAPPED

Money not spent on new roads could be spent to upgrade existing 4WD roads for access by all vehicles and to improve and expand facilities for handicapped at currently existing recreation sites. This would do far more than building more roads to enhance and expand the opportunities of handicapped and elderly people to engage in an outdoor experience that is more genuine and satisfying than simply staring at the lakes and mountains through a windshield. New roads, without appropriate facilities, do not provide any meaningful new opportunities for handicapped people. (Individual, Lakewood, CO - #12965.93610)

Public Concern: The Forest Service should provide a comparison between the Forest Service's requests for road maintenance funding and congressional appropriations for road maintenance over the past five years.

Prior to making a final decision on this proposal, I request that you analyze the following items and make that analysis available for public review and comment:

...a comparison of the Forest Service's request for Road Maintenance funding and the Congressional Appropriations for Road Maintenance for the past five years. (County Elected Officials, Montrose, CO - #13993.93611)

Public Concern: Chief Dombeck should ask for funds to adequately support the Forest Service's recreation and trails programs.

Mr. Dombeck, ask for funds to adequately support the Forest Services recreation and trails programs. We don't need highly maintained roads through most of these lands. The bulk of them only need to be two tracks. (Individual, No Address - #6555.93610)

7.2.6.7 User Fees and Costs for Recreational Opportunities

Public Concern: There should be increased funding for support of recreational goals and uses of roadless areas.

I emphasize...increased funding for support of recreational goals and uses of the national forest roadless areas. (Individual, No Address - #2213.10110)

It is the responsibility of government and its departments and agencies to manage and provide proper funding for the management of these public lands for all people, and this includes the opportunity to use and provide for recreational vehicles such as snowmobiles, watercraft, and all terrain vehicles in National Forests. (Individual, Hastings, MN - #4684.93640)

Public Concern: The Forest Service should consider the benefits from fees and volunteer services contributed by users to maintain roads and trails.

Charging us a fee then closing the roads, isn't that defeating the purpose of the fees? (Individual, No Address - #423.93642)

Is the federal government willing to bridge the gap in the amount of money generated each year by the use of recreational trail riders? I seem to think that it will not, the government has too many other things to worry about, why change a system that works? Off-road riding generates a large amount of money for the park service. (Individual, No Address - #408.93642)

We are already having to pay more and more, with trail park passes and the like. (Individual, No Address - #1155.93642)

With the Forest Service now collecting fees to visit OUR forests, this proposal can only increase the costs of Forest Service operations. (Individual, Stevenson, WA - #2386.93642)

Charge sufficient fees to maintain the roads for those who use the existing roads, whether they are loggers or ORV. (Individual, Columbia, SC - #1942.93645)

I was informed today by some of my fellow riders that the next proposed closing of an OHV area will be in the "Prosser" area due east of Truckee, CA. I am writing to let you know that I'm strongly opposed to more closings due to what, as I understand it, the "Roadless" issue is. These are designated Off Highway Vehicle roads for the use of Off Highway Vehicles of course they are not for passenger cars. Our green sticker registration money along with the U.S. Forest Service provides maintenance for these roads. (Individual, Tahoe City, CA - #10945.91612)

Public Concern: Funding from the off-highway vehicle community may be terminated due to agency misuse of those funds.

The Forest Service in concert with the California Department of Parks and Recreation OHMVR Division has produced some maps of OHV routes through and about many of the NF's in California. The resource staff of many forests including the Cleveland, Angeles, Plumas, etc. does not feel obligated to keep any of those facilities opened for the OHV community. An OHV community that, through the OHMVR gives grants to the Forests to maintain roads and do rehabilitation of areas for OHV enthusiasts. This very constant and valuable source of funding for the maintenance of the forest road system is and continues to be misused and compromised and may soon be terminated as a result of that misuse. Resource staff continues to ask the engineering staffs to close off these routes and not open them when maintenance is needed. (Individual, Chico, CA - #10596.93640)

Public Concern: The formula for determining the share of the gasoline tax for off-highway vehicle recreation should be audited due to the adverse impacts caused by motorized users.

OHVs get an unlawful amount of money from gas tax. This formula should be audited. Gas tax money should go to purposes other than providing a minority of motor speed sports enthusiasts a playground on which to pollute our watershed, disrupt wildlife, displace other people and ruin local tourist economies. (Individual, Markleeville, CA - #236.91500)

Public Concern: The Forest Service should not make the public purchase permits or charge user fees to use public lands.

Many working people may only get one or two days to enjoy camping, fishing, hunting or whatever. They certainly shouldn't have to pay fees, and other revenue collecting tactics to enjoy what they should be able to do for free. (Individual, Dillon, MT - #18226.93642)

I would like to have the forest roads remain open without any fees, these are my forests and my taxes paid for the improvement that you have put into the forest camps and the road now you want to charge me a fee to use my facilities. This is double taxation and the fees usually only pay for the people to enforce and collect money. I strongly object to a fee system in the Forest Service. You are becoming money mongers, toll roads in national forests are a disgrace and should be banned. Keep access to my lands open so my family and I can recreate the way we want to without feeling like we are being raped every time we want to enjoy cool canyons. I have motorcycled and Jeeped and floated the country for years and now every time I turn around it is "Disneyland" congesting all the people in concrete sterile all alike campsites. (Individual, Sandy, UT - #13502.93642)

As roads are closed and the plethora of passes (i.e. Adventure Passes) increase, soon only a privileged few will be able to enjoy our forests and only on foot from the boundaries. Between the Forest Service's Adventure Pass, the state park annual passes, National Park passes, and local parking fees, an individual now must pay in excess of \$120 per year to enjoy the "public" lands of southern California. (Individual, Escondido, CA - #15965.93642)

DISCONTINUE THE TRAIL PARK FEE DEMONSTRATION PROGRAM

Please discontinue the trail park fee demonstration program. These are public lands! (Individual, No Address - #6541.93642)

DISCONTINUE THE ADVENTURE PASS PROGRAM

I also believe the "Adventure Pass" program should be abandoned. (Individual, San Luis Obispo, CA - #9745.93642)

Public Concern: The Forest Service should incorporate a fee or permit system for using certain areas of public lands.

The use of the trails for recreational purposes has been a big part of friends and relatives lives for many years. For those of us who are not into the regular sports of baseball, football, and basketball it gives us something to enjoy with our children and a connection/bonding with them. I would be more than happy to pay a fee to be allowed to continue using the area for these purposes and the money could go towards up keep of these areas. There are so few areas now where people like me and my friends can go camping and trail riding in the same area. Being a father of 3 I can say they enjoy and respect the forest and parks for what they are and it would be a tragedy if we were unable to enjoy the family bonding that these areas allow us. I can say I have seen people who abuse the use of the parks, usually younger people that don't appreciate them for what they are. I believe that incorporating a fee for use would tend to curb some of the irresponsible people from using these areas. (Individual, No Address - #6956.92200)

What about the question "I already pay taxes; therefore, aren't my uses of the national forests already covered?" My answer is that those who benefit disproportionately should pay disproportionately. An analogy exists in the public university system wherein the taxpayers subsidize the system. But students that utilize the system pay a fractional portion of that cost.

The difficulty in collecting such fees is presented as a huge barrier to such an approach. Entrance fees to use national forests, analogous to those charged for national parks, are of limited use due to differences in ease of access. Why not charge a federal land use fee good for entry to federal lands--ALL federal lands--and then charge additional fees for special uses such as hunting, fishing, campgrounds, etc? (Timber Association, Medford, OR - #13658.93642)

I know here in TN that anyone who hunts on National Forest lands has to purchase a wildlife management permit. But those who enjoy the forest by hiking, bicycling, horseback riding, or riding atv's do not have to purchase this permit. Maybe it's time for these groups to start paying for a permit to help with funding, to take care of the roads that we have. (Individual, No Address - #9722.93642)

CHARGE FEES BASED ON THE AMOUNT OF DAMAGE A PARTICULAR ACTIVITY CAUSES

If fees are used in national forests, then base them on the damage (all the damage i.e. siltation, pollution, noise, parking, sewage, litter pickup) they cause. Charge high fees for motorized vehicles and low fees for hikers, canoeists. Reserve our national parks for nature activities instead of noisy things like jet skis and snow mobiles. (Individual, Tallahassee, FL - #13710.93642)

IMPOSE A \$15.25 FEE ON BICYCLES AND CROSS-COUNTRY SKIS

How about a 15.25 fee for all these bicycles & cross-country skis. (Individual, Nathrop, CO - #8418.93642)

EXPAND THE TRAILHEAD PERMIT SYSTEM

Some areas should be managed for non-motorized recreation - hiking, cross-country skiing, snow-shoeing, horseback riding - with recreation areas, parking and trails paid for by users. The trailhead permit system is an excellent idea that should be expanded. (As an aside, I'm not sure why many hikers and self-proclaimed environmentalists haven't figured out that this permit system is their chance to demonstrate that hiking is a use of the forest that holds value for people. That paying to park their cars and maintain the trails is their opportunity to send a signal to the marketplace that cutting trees down isn't the only forest use with economic value.) (Individual, No Address - #6322.91700)

Public Concern: The Forest Service should address the "willingness to pay" principle.

The social benefits of natural areas need to be emphasized; not only use values but existence values. Can a "willingness to pay" principle be translated into extra assistance for the small proportion of the population adversely affected by this proposal? I would be willing to pay extra to protect these areas. (Individual, Leavenworth, WA - #15897.93200)

Passive use (PU) estimated benefits such as those cited on page 3-163 are often grossly exaggerated. For example, it was claimed in the Selway grizzly introduction EIS that PU benefits would be \$42 million, based on "willingness to pay" surveys. However, the actual willingness to pay is hardly ever assessed. An environmental organization in Montana did a willingness-to-pay survey in which the public was asked [their opinion] theoretically, and then asked to actually cough up membership dues and/or contribute to the stated cause. In a nutshell, it appears that PU benefits are overestimated by a factor of 60. For each 60 dollars of stated PU benefit, the actual cash-on-the-barrelhead amount is likely one dollar. The Forest Service should conduct a PU survey in which the "value" of roadless areas should be asked, accompanied by a follow-up request for a subsidy contribution to cover management of those areas. This is the only fair way to place an actual dollar value on passive-use value assessments. (Individual, Whitefish, MT - #30417.90010)