Summary of Public Comment

Roadless Area Conservation Proposed Rule and DEIS
2000

Prepared by:

USDA Forest Service
Content Analysis Enterprise Team
(801) 517-1020

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Executive Summary

Introduction

The following is a summary of comment received by the Forest Service regarding the Roadless Area Conservation Proposed Rule and Draft Environmental Impact Statement (Draft EIS). The comment period was May 9 to July 17, 2000. The Forest Service has received close to 1.2 million responses, over a million of which are form letters. Each response may contain anywhere from one to several hundred comments.[1] These comments have been analyzed using a process called content analysis. This involves a systematic method of compiling, categorizing, and capturing the full range of public concerns regarding the proposed rule. Information from formal public meetings, letters, emails, faxes, and other sources are all included in this analysis.

Although this analysis attempts to capture the full range of public issues and concerns, it should be used with caution. The respondents are self-selected; therefore their comments do not necessarily represent the sentiments of the entire population. However, the analysis does attempt to provide fair representation of the wide range of views submitted. In considering these views, it is important for the public and interdisciplinary team members to understand that this process makes no attempt to treat input as if it were a vote. In no way do the results of the content analysis attempt to sway decision makers toward the will of any identifiable majority. What the content analysis process does is ensure that every comment is considered at some point in the decision process.

Content Analysis Process

Content analysis is a method developed by a specialized Forest Service unit, the Content Analysis Enterprise Team (CAET), for analyzing public comment. This method employs both qualitative and quantitative approaches. It is a systematic process is designed to provide a mailing list of respondents, extract concerns from each letter, evaluate similar concerns from different responses, and identify specific issues. The process also provides a relational database capable of reporting various types of information while linking comments to the original letters.

Through the content analysis process the team strives to identify all relevant issues, not just those represented by the majority of respondents. Breadth and depth of comment are important. In addition to capturing relevant factual input, the Content Analysis Enterprise Team identifies the relative emotion and strength of public sentiment behind particular viewpoints.

Content analysis summaries and reports are not intended to replace original letters. The summaries attempt to capture all significant concerns and issues related to a project. However, they are only summaries and the database reports are vital for actual response to comments. As noted above, the database reports are linked directly to individual letters. The sample comments contained in this summary simply illustrate the various viewpoints submitted by respondents.

[1] Responses refer to single, whole submissions from respondents--e.g., letters, emails, faxes, presentations at public meetings, etc. Comments refer to identifiable expressions of concern made within responses.

Letter numbers are provided, enabling the reader to track and review the original letter, if necessary.

Overview of Document

This document contains nine chapters reflecting public sentiment on a variety of issues both diverse and interrelated. These issues range in nature from the strictly procedural to the technically specific. Public comment on these issues demonstrates the interest, strong feelings, and deep concern Americans have regarding the management of national forests and grasslands.

The Executive Summary begins with a general analysis, proceeds with identification and discussion of respondents' main areas of concern, and concludes with an overview of succeeding chapters. Within each chapter, each general section and major subsection begins with a narrative overview of the public concerns relevant to that topic. Following these narrative overviews, the public concerns are presented in a formal list, each accompanied with one or more supporting sample comments. A citation accompanies each sample comment identifying the respondent's organization type (e.g., individual, elected official, recreational organization, etc.), city and state, letter number, and category code assigned to that comment.

One point should be noted here. Not only are the organization types of respondents referenced in sample comment citations, they are sometimes referenced in the narrative overviews as well. Neither reference is meant to imply that only that respondent, or respondents of that organization type, expressed that concern. Public comment on this proposal is widely varied, and the sample comments which appear in this summary are purely representative.

General Analysis

The Roadless Area Conservation Proposed Rule and Draft EIS (referred to generically as the proposed rule) has inspired intense public debate. On the one hand, people are divided over whether roadless areas should be accorded any further protection[2] than they presently receive. On the other hand, both those in favor and those opposed to further protection are at odds with the Forest Service over the Preferred Alternative identified in the Draft EIS. Neither group likes it–those who favor protection because it does not go far enough, those opposed because it goes too far. Thus it should be clearly understood that when this document makes reference to proponents of the proposed rule, it is referring to those who favor greater protection for roadless areas and, for that reason, favor the proposal to further protect them. This reference, however, should *not* be understood as implying support for the Preferred Alternative as it is presently written. Out of all the some 1.2 million responses submitted, very few respondents support that.

The reasons for this almost unilateral opposition to the Preferred Alternative are best illustrated in the debate between those who favor and those who oppose roadless area protection. This

[2] Although the proposed rule is titled the Roadless Area Conservation Proposed Rule, very few respondents use the term conservation when addressing this issue; rather, most use the term protection. Because it is the purpose of this document to fairly represent the public's views, the term protection is often used.

debate is driven in large measure by competing sets of values and viewpoints. In general, those who favor the proposed rule and those who oppose it fall roughly into two camps in terms of background and way of life, in terms of how they see the forest, and in terms of how they see the role of government. Such differences are not always clearly defined, and indeed may sometimes be more apparent than real. Yet it is clear that those who express strong views on this subject–which are the majority of respondents–are motivated by certain assumptions and points of emphasis related to the above factors.

Those who favor the proposed rule are not easily categorized in terms of background and way of life, as they do not generally identify themselves in those terms. It is those who oppose the rule who tend more often to do so. Opponents often identify themselves as persons connected in some way with forest resource industries; as persons who engage in motorized recreation on public lands or who, due to age or disability, are dependent on motorized access; or as persons who are or have been involved in public land management in various capacities. While no firm assumptions can therefore be made regarding the background and lifeway of those favoring the proposal, it is clear that the life experience of many opponents is rooted in a certain kind of relationship to forest lands, a relationship which clearly motivates a certain way of looking at the land.

Those favoring roadless protection tend to see forest lands as whole ecosystems which human activity disrupts. Thus for these respondents, protecting roadless areas consists in leaving them alone to evolve naturally through their own dynamic processes (although some proponents would condone some, very limited stewardship activity). Persons holding this view place a high priority on protecting the environment. They believe roadless areas should be protected for their own intrinsic value as undisturbed wildland, for the benefit of wildlife, and for the benefits these areas offer to humans. These places are important, proponents note, as sources of clean drinking water and clean air, and as places of solitude and spiritual renewal. As such, they believe as well that their value as places for passive recreation–hiking, backpacking, etc.–far exceeds whatever value attaches to the commercial resources they contain. Indeed, according to proponents, satisfying human desires for forest products (timber, minerals, etc.) must take second place to satisfying the real human need for a healthy environment–both local and global–and for quiet, natural places to escape to for mental and spiritual regeneration.

Proponents stress the view, moreover, that humans are not the only species on the planet, nor are they the only species whose needs and desires deserve to be met. In this regard, proponents tend to hold a very inclusive view of all living things. In holding this view, they are not insensitive to the competing concerns of those whose sources of enjoyment and/or livelihood depends on more ‘active’ uses of forest lands. But they do believe both that the need for roadless protection outweighs those other concerns, and that those concerns can in fact be mitigated, for example, through retraining programs, development of alternative materials, and the designation of less sensitive areas for motorized recreation.

Opponents of the proposed rule see forest lands differently than do proponents. They see them in terms of the resources they offer for human use. It is not the case that these persons do not care about the environment. Indeed they care deeply. Where the two groups differ is in their perspectives on what the fundamental role of forest land is, and hence what is the best way to

care for these lands. As noted above, proponents of roadless protection see the forest primarily as an ecosystem whose long-term health depends on being left alone. Opponents see the forest as an ecosystem as well, but an ecosystem capable, under proper management, of providing a host of goods, including numerous recreational opportunities, for human well-being. For these people, protection consists in managing these lands, in a sense, as one would a farm for the purpose of maintaining sustained harvests. Hence roads are necessary to allow management activities (fuel thinning, treatment for insects and disease, etc.), to allow responsible, sustainable resource extraction, and to accommodate increasing recreational demands. The failure to actively manage forest lands, argue these respondents, would doom these lands to insect infestations and catastrophic fire. True protection, they insist, consists in actively and prudently caring for these lands, the benefits of such care being the many uses humans enjoy. Moreover, opponents argue, prudent management benefits wildlife as well as humans. A number of species, they contend, thrive on early successional habitats created by timber harvest, and indeed, they go on, wildlife in general is not harmed by human use of these lands.

Thus what separates the proponents and opponents of the proposed rule is an honest difference in perspective regarding the fundamental nature and role of forest lands. This difference in perspective, however, gives way to highly charged perceptions, on the part of opponents, regarding their status in this whole debate. Opponents defend activities that those favoring protection decry; and because they see proponents as well financed and highly influential, they see themselves as the underdog. They consider themselves looked down on by “wealthy, elitist environmentalists” who try to ban the very activities opponents see as genuinely necessary, and who try to ban further the forms of motorized recreation that, for many opponents, have become much loved family traditions. Opponents of roadless protection express a great deal of resentment over what they perceive to be a condescending attitude by “big money” environmental groups who, they believe, are really the ones driving this plan. These writers feel discriminated against and disenfranchised. They believe their voices do not count, that the only voices that do count are those of the environmentalists.

This sense of disenfranchisement, coupled with the view that environmental groups are really driving this whole process, accentuates the deep distrust many opponents harbor for government in general. Those who favor the proposed rule do not generally express the same level of distrust toward government. Proponents believe that the need to protect these areas is so great and the scope of needed protection so dispersed across the country that only a national directive will adequately protect these lands. These respondents fear that if left to the discretion of local planners, roadless values will be sacrificed to influential, local commercial interests. Thus it is local forest managers that proponents distrust. They believe that absent a centralized directive requiring local forest managers to protect these areas, they simply will not be protected.

Those opposed, on the other hand, tend to see centralized directives as an assault on their freedom. Many of these respondents believe the government–by which they often mean to include national Forest Service leadership–has imposed too many restrictions on the American people already. They believe that if the proposed rule is adopted it will only be the start of more closures. Next, they believe, motorized recreation will be banned, and then these places will be declared wilderness. These writers claim, in other words, that once restrictions are imposed, those restrictions will only grow. Often these writers do not oppose the proposed rule because of

what it actually proposes to do, but because of the further restrictions they fear will follow from it.

In summary, those favoring the proposed rule and those opposing it tend to hold very different assumptions and beliefs regarding the nature and role of forest lands and the role and credibility of government, the federal government in particular. It is not necessarily the case that proponents and opponents occupy diametrically opposed positions within American culture at large. It is the case that, in general, these groups lean toward different views on a number of issues. In other contexts these differences may not be significant. But in the context of the proposed rule for roadless protection, these differences take on sharp contrast. The one group sees it as a positive step toward protecting what wildlands we have left, ultimately toward improving human well-being and preserving the health of our planet. The other group sees it as an assault on human freedom, an attack on their way of life, and a recipe for forest degradation.

These competing views are expressed by respondents within the context of a number of issues relevant to the proposed rule. Following analysis of public response to the Notice of Intent (NOI) to establish national direction for roadless area management, the Forest Service identified six broad categories of concern to the public. These categories are access, identification of other unroaded areas, exemptions, environmental effects, local involvement, and forest dependent communities. Based upon comments received following publication of the Draft EIS, it is clear that these remain key categories of concern to the public.

Added to these concerns, however, are concerns over the adequacy of the Draft EIS itself and concerns over the cumulative effects of this and other recent policy initiatives. Concerns over the Draft EIS, together with concerns over local involvement, fall under the wider category of the public involvement process in general. Concerns over cumulative effects were expressed during the comment period for the NOI; with publication of the Draft EIS, however, they have become much more prominent and thus now merit their own discussion.

New to this round of public comment as well, of course, are concerns over the alternatives presented in the Draft EIS and development of the rule. In a sense, comments on the alternatives do not make up a separate category of concern, as these comments are tied inextricably to respondents' concerns over other major issues. However, it is just as true that all of the issues of concern to respondents are deeply interrelated and do not easily give way to independent discussion. Nevertheless, for purposes of analysis they are useful distinctions to make; hence these eight categories of concern--access, identification of other unroaded areas, exemptions, environmental effects, public involvement, forest dependent communities, cumulative effects, and alternatives and rule development–will each be discussed in turn. These discussions all reflect the competing views which, as noted above, are motivated by different assumptions and beliefs regarding the nature and role of forest lands and the role and credibility of government.

One final point is worth making before moving on to these major categories of concern. Of all the responses received by the Forest Service, by far the majority have been form letters; to many of these the respondent has only added his or her signature, but to many others respondents have added personal comments. In addition to original letters, these form letters represent some of the strongest positions taken by respondents. Form letters in favor of the proposed rule almost

invariably ask that the rule ban all extractive activities and motorized recreation from roadless areas 1000 acres or larger; that it accord such protection immediately on a case-by-case basis; and that it include the Tongass National Forest in southeast Alaska. Form letters opposed to the proposed rule almost invariably ask that continued access be maintained for forest management, resource extraction, and recreation (with a special concern for motorized recreation); in addition, these letters often point to the negative effects respondents believe the rule will have on forest dependent communities. The personal comments often added to such letters do not generally add to the concerns formally expressed therein; they do, however, often indicate the depth of emotion respondents feel over these issues. The fact cannot be overemphasized that the debate over the proposed rule is–for many, many respondents–a highly emotional one; and it is only fair to acknowledge that while the majority of responses have been form letters, they are not thereby devoid of the same genuine, personal concerns and feelings expressed in original letters.

Access

Among concerns expressed over the proposed rule, concerns over access are among the most prominent. Indeed other concerns generally have their basis in concerns over access. Those favoring the proposed rule believe that, for the good of the forest, access must be restricted. Because of the negative impacts human uses have on the environment, they claim, access for these uses should bow to the greater need for protection. These respondents call on the Forest Service to either ban or restrict a number of activities in roadless areas, including: timber harvest, mining, development of oil and gas reserves, grazing, motorized recreation including snowmobiles and, where applicable, watercraft. These activities, they argue, cause destruction and erosion and, in the case of off-highway vehicle (OHV)[3] use, cause excessive noise and pollution and leave behind piles of litter. Many respondents would like to see such outright banning or restrictions extend to all national forest areas, not just inventoried roadless areas.

Proponents offer a number of suggestions for limiting access. Some suggest that all roads not absolutely essential for forest management be closed. Others suggest that whole areas be closed routinely to all uses on a rotating basis. Some writers suggest that only the handicapped and senior citizens be allowed to use the road system. Many respondents specifically address OHV use, some saying it should not be allowed except for emergency situations. Quite a few suggest that certain areas be set aside and reserved just for OHV use. At the very least, many respondents note, the Forest Service needs to establish clear guidelines for the use of OHVs on National Forest System lands.

While many writers clearly wish to ban or restrict human activities in roadless areas or throughout the National Forest System entirely, some writers are quick to point out that the Preferred Alternative would not unduly limit people's use of the forests. Existing roads, many say, provide adequate access for forest management, recreation, and other uses. And as for the argument that the proposed rule would unfairly restrict access to all but the wealthy, young, and physically fit, a number of respondents–including those who are themselves elderly or disabled–

[3] Respondents refer to off-highway vehicles (OHVs), off-road vehicles (ORVs), and all-terrain vehicles (ATVs), usually in a sense which is interchangeable. To avoid confusion and preserve consistency, these vehicles are referred to collectively as OHVs in this document unless context requires a different usage.

point out that even with protection, numerous activities would still be available to those with limited mobility throughout National Forest System lands.

In short, proponents favor restricted access for human uses either within roadless areas or within the national forests at large. They point to the environmental damage done by these activities and the environmental benefits to be derived from limiting them (air quality, water quality, increased biodiversity, etc.). Finally, others note that the protection offered by the Preferred Alternative would not go so far as to unfairly restrict people, even senior citizens and the disabled, from using forest lands.

Opponents of the proposed rule, however, believe otherwise. Some point out, first of all, that natural phenomena cause greater environmental damage than do human activities–both recreational and commercial–so restricting human access would not be the panacea proponents believe it would be. Opponents point out further that where human activities do cause damage, the solution lies in stricter monitoring and enforcement, not in further restrictions.

On the whole, however, opponents' arguments against the proposed rule follow two lines of reasoning with respect to access. They argue, first, that active forest management activities are vital to maintaining healthy forests and that roaded access is essential to carrying out those activities. They argue, second, that a well managed forest is capable of supplying a number of goods to fill the legitimate needs of human beings–from forest products to recreational opportunities–and that roaded access is essential to taking advantage of those goods. These writers point out not only that well managed forests are capable of supplying such goods, but that a number of federal land use acts guarantee citizens the right to access them. Writers point to such acts as the Multiple Use and Sustained Yield Act, the Organic Act, the Federal Land Policy and Management Act, the Roads and Trails Act, the General Mining Law of 1872, and subsequent decisions surrounding RS2477 claims, as representing a body of legal protection for uses of federal public land which the Forest Service may not disregard.

Not only is concern expressed over access for extraction activities per se, but also over access to utilities and to water delivery systems for municipalities, etc. Concern is also expressed over access for public safety. Finally, much concern is expressed over access for all kinds of recreation, though particularly for motorized recreation. These writers often explain that OHV use has become a family tradition–one that family members of all ages and physical ability can enjoy, and one that provides young people a wholesome alternative to many of the problems besetting today's youth. It is also an activity, most of these writers point out, they engage in responsibly. They stay on approved trails and pack out their own litter, as well as litter left by others. While admittedly there are irresponsible OHV users, these writers point out that the vast majority, who are responsible, should not be restricted because of the actions of a few, and they greatly fear that that is exactly what will result from the proposed rule. Many, in fact, seem to feel that the proposed rule will close down a majority of the national forests to all use.

A number of opponents also point out that if access is restricted to some areas of the forest, then use will concentrate in other areas, thereby leading to greater environmental damage in those places. Writers also argue that access should be maintained to existing camping and recreational areas, as should access to roads of historical or scenic significance. In addition, a great many

opponents express the concern that roadless area protection will unfairly shut off these areas to the very young, the very old, and the disabled–that roadless areas will be open only to the physically and financially elite, those with the physical stamina and financial resources to allow for extended trips into the backcountry. Indeed, some respondents suggest that the Forest Service should do more to accommodate people with special needs, at least in some roadless areas, by providing senior citizen paths, wheel chair access, and short loops for sightseeing.

Finally, a number of respondents express concern over issues surrounding privately owned land. One such concern is access for inholdings. Another is access to federal public land through private land. Writers complain that as lands adjacent to national forests are bought up by private individuals, those individuals are closing and blocking access to longstanding routes into the forests. Writers report that this is a growing problem which the Forest Service must address.

In summary, opponents to the proposed rule are concerned that access must be maintained for forest management activities, extraction activities, and recreation. They believe not only that such activities, carried out responsibly, do not harm the forests (indeed in the case of management activities are good for them), but that established law is on their side. They are concerned that the proposed rule will unfairly shut out the elderly and/or disabled from certain areas of the forests, leaving those areas as “private playgrounds” for the wealthy, physically fit elite. Finally, these writers are concerned over legitimate access to private inholdings and over continued access to longstanding routes into the forests which now run through private property.

Identification of Other Unroaded Areas

The identification of other unroaded areas has to do with the criteria to be used for determining the roadless areas to be covered by the proposed rule. This is a topic of much confusion to many respondents. Many who oppose the proposed rule are concerned that the vague description of what constitutes an ‘other unroaded area’ or ‘uninventoried roadless area’ will lead to the inclusion of all sorts of areas, including many that have existing roads and are currently open to various uses. Many ask for more precise definitions, and request maps to show where these ‘other’ areas are located. A few mention certain areas that they particularly do not want to be considered roadless. Many of these are areas where ski resort expansions or other proposals are pending.

On the other hand, many of those who support the proposed rule voice concerns about how uninventoried roadless areas will be managed in the interim until they can be inventoried and considered for protection. Many ask that the inventories be done immediately, and include areas smaller than 5,000 acres. In addition to the unroaded portions of inventoried roadless areas, some proponents believe wilderness study areas should be included. Many suggest that the rule cover all remaining uninventoried roadless areas. These writers point out that uninventoried roadless areas certainly provide the same values as inventoried ones, and see the distinction between them as arbitrary and unwarranted. A number of writers suggest protection be extended to roaded areas of inventoried roadless areas as well.

Many respondents maintain that the roaded status of a given area should not be the determining factor for inclusion under the proposed rule, but the area's biological value. Quite a few writers argue that biologically significant areas of any size should be protected.

With respect to the minimum number of acres to be accorded protection, respondents' views vary. Some would prefer not to set any minimum acreage boundary, and suggest the proposed rule apply to all roadless areas of any size. Beyond that, respondents suggest a variety of acreage sizes be protected. By far, however, most proponents favor protection for areas of 1000 acres or more. Some say, at the least, that the minimum acreage should be 1000 in the eastern United States, where vast tracts of roadless areas do not exist as they do in the West. Some also suggest roadless areas of 1000 acres or larger be included when within 10 miles of another roadless area or a national park.

On the whole, most respondents favoring the proposed rule believe the Forest Service's suggested 5000 minimum acreage within inventoried roadless areas is inadequate. While writers make varied suggestions, the overwhelming sentiment is that roadless areas of 1000 acres, inventoried or not, be protected by this rule.

Exemptions

Respondents express a great deal of disagreement over the question of whether exemptions from the proposed rule should be allowed. Many argue that no exemptions should be allowed, others argue that they should. The most prominent issue of debate is the question of whether roadless area protection should be extended to the Tongass National Forest. Opinion on this issue parallels opinion on the proposed rule. That is, support for including the Tongass comes from those supporting the proposed rule; opposition to including it comes from those opposed to the rule. Concern about this issue, however, is not equally represented by those respondents favoring and those opposed to the proposed rule. Among proponents of the rule, the sentiment is very, very commonly expressed that the Tongass should be included, regardless of where these persons reside. Among opponents of the proposed rule, comments voicing objection to including the Tongass come almost exclusively from Alaska residents.

These writers argue that implementation of the proposed rule in the Tongass would have devastating economic impacts on Alaska's forest resource industries and rural, forest dependent communities. They also express resentment that people the whole country over, with utterly no knowledge of local conditions in southeast Alaska, are promoting the inclusion of the Tongass. In addition, these writers point to the years of work and public collaboration that have gone into the recently completed Tongass Land Management Plan, and say it would make a mockery of the whole forest revision process to simply override it by national mandate. Thus they feel the Forest Service should defer any action on the Tongass.

Those in favor of including the Tongass, however, point out that the Tongass is not the only forest with a recently completed forest plan and argue there is no legitimate, scientific reason for excluding it. Indeed, these writers assert, a decision not to include it could only be interpreted as a bow to political pressure from Alaska's congressional delegation. In that vein, a number of

Alaskan residents in favor of inclusion make a point of saying that Alaska's politicians do not speak for all Alaskans.

Not only do most proponents of the proposed rule favor including the Tongass, by far the great majority of these respondents argue that the Preferred Alternative, T3, does not go far enough. The Forest Service, they argue, should adopt Alternative T4. These writers emphasize the environmental benefits to be gained by including the Tongass, and the environmental degradation to be incurred by not including it. Thus they say the Tongass needs protection now, that adoption of Alternative T4 would put the Tongass in line with other national forests, and that in any case there are already sufficient roads to meet timber, recreational, and subsistence access needs. Writers also argue that given local sentiment on this issue, only a decision at the national level would suffice. As one person puts it, "Even if Tongass decision makers have the inclination to protect roadless areas, they may be unable to do so in the social, economic and political climate in which they live and work. If roadless areas are to be protected in the Tongass, local decision makers should be insulated from the fallout of that decision, and so the decision should be made *now*, at the national level."

In addition to comments regarding inclusion of the Tongass, respondents make a number of comments regarding areas or activities they do or do not want exempted from the proposed rule. For example, opponents ask that exemptions be made for mining, oil and gas exploration, utility maintenance, ski resort expansions, and special use permits for scientific research projects. Proponents ask that no exemptions be made for stewardship logging, salvage harvest, ski areas, and that exemptions from the ban on road construction in general be severely restricted. Some maintain that any exemptions from the rule should be subject to the National Environmental Policy Act (NEPA) analysis process and independent scientific review. As one respondent explains, "For far too long, [activities for 'forest health'] have led to the flagrant abuse and destruction of much of our remaining real forest." These persons insist that if exemptions are granted, the rule won't mean anything. Respondents also identify a number of specific areas they wish to see included or excluded from the proposed rule. These areas are listed in Appendix B.

Environmental Effects

Respondents differ greatly in their views on how the proposed rule will affect the environment. These differences are rooted in the views people have on the nature and role of forest lands. In general, those in support of the proposed rule see it as a necessary step to improving and preserving the health of roadless areas with respect to a number of factors; while those opposed see it as a barrier to forest health. Opponents argue as well that the proposed rule is grounded in a number of misconceptions about the nature of ecosystems and the effects of human intervention. These different views are discussed with respect to forest health, vegetation, wildlife/fisheries, biodiversity, watersheds, soil, and air quality.

FOREST HEALTH

Forest health is a broad term representing a wide array of more specific issues. In general, those favoring the proposed rule believe the result will be at least some significant amount of acreage

protected from development. They believe these areas will be much healthier if left intact and undisturbed, and thus much less vulnerable to catastrophic fire and disease and insect infestation.

Opponents of the proposed rule, however, believe that active management is essential to maintaining forest health. These writers argue that fuel management and fire suppression are necessary to prevent large, catastrophic fires, and that roaded access is needed to carry out these activities as well as to treat for insects and disease. A number of respondents point to the Los Alamos and other fires this summer as evidence of the need to actively manage forest lands.

VEGETATION

With respect to vegetation, many proponents of the rule cite the need to protect old growth from timber harvest. There is also a great deal of concern expressed over the influx and spread of noxious weeds. Most proponents do not believe active management is necessary to control invasive weeds; they believe the best prevention is to simply restrict human entry. One writer explains that "Invasive weeds are brought into areas by foot traffic, motorized traffic and livestock . . . . Robins, magpies and other weed wildlife follow the human routes into roadless areas. Weed plants and weed wildlife reduce the habitat of native species thereby pushing out native plants and animals." Another writes that "Weeds follow roads . . . . The areas of our forests that have yet to be invaded by noxious weeds are almost exclusively found within roadless lands. Building roads into them will only allow the weeds an avenue of spread."

Opponents see things differently. They believe, to begin with, that because forests are dynamic it is a myth to think single-aged stands of growth, e.g. old growth, can be 'protected' from change. Second, opponents believe active management is necessary to control invasive weeds precisely because they believe human entry into forest lands has little to do with the spread of weeds. To put the blame on human activity, protests one respondent, "shows an utter disregard [for] the forces of nature. The wind in conjunction with bird and animal droppings will continue to spread plants regardless of the whims of [some] bureaucrat." Further, some opponents point out, roads actually have a beneficial effect on forest vegetation, as they let in the sun.

WILDLIFE/FISHERIES

Those in favor of the proposed rule argue that active management negatively impacts wildlife and aquatic species. Most often they point to roads, motorized recreation, and all forms of logging as having the most detrimental effects on wildlife. Roads, many writers argue, fragment forest areas, thereby interrupting natural wildlife corridors necessary for maintaining genetic diversity. At the same time, they go on, road induced sedimentation in rivers and streams compromises water quality, and thus the viability of aquatic species.

Those opposed to the proposed rule argue not only that active management does not harm wildlife, but that it actually benefits it. As one writer points out, "Animals like managed forests a whole lot more than the wilderness areas which are overgrown with brush and messed up with fallen trees." Remarks another, "The harvested areas will be beneficial to wild game with the grasses growing in the area until the timber takes over again." A number of respondents point out that snowmobile use benefits wildlife inasmuch as it provides them a packed down trail to use in preference to surrounding deep snow. Some writers point out, further, that plants and

animals go through natural cycles of new species development and extinction, and these cycles occur in roadless as well as roaded areas.

BIODIVERSITY

Many proponents of the proposed rule point to the negative effects of roads, logging, and OHV use on biodiversity, and the positive effect of roadless areas in preserving and enhancing it. Notes one respondent, roadless areas are especially important "because they are a reservoir of biodiversity that we will need to draw on for medicines, food and other resources." Opponents of the rule, however, discount the assumption that the preservation of biodiversity requires undisturbed forest land. Believing as they do that human activity is not inimical to the well-being of plant and animal life, these respondents believe the proposed rule is simply not necessary to further that purpose.

WATERSHEDS

One of the most common environmental concerns respondents raise is the need to protect watersheds for the clean drinking water they supply. As with other issues, views on what that does or should entail differ greatly. Those favoring the proposed rule insist that protection of roadless areas is essential to maintaining high quality watersheds. A number of writers suggest as well that cattle and OHVs should be banned in riparian areas. These writers maintain that roads and logging lead to siltation of waterways, and so should be prohibited in roadless areas specifically to protect watersheds. Logging should be prohibited, these respondents assert, not just because of the erosive effect of the activity itself, but because of the importance of tree stands and attendant vegetation for water retention. As one person explains, "Just a few square feet of foliage can hold quite a bit of water." Says another, "Healthy watersheds soak up rainfall and snowmelt like a sponge and release it into rivers and streams slowly throughout the year."

Opponents of the proposed rule argue just as strongly that active management is necessary to preserve high quality watersheds. Specifically, a number of writers maintain that managed timber harvest improves stream flow. Asserts one writer, "Large trees use over 100 gallons per day to exist . . . . Our streams . . . need the water for stream flow that the mature trees are capturing before the water has a chance to even get to the streams." These respondents argue as well that damage to watersheds does not necessarily come from developed activities. "Where," asks one respondent, "is the discussion of the effect of fires–large ones–on the watershed as well as dying and diseased forests? . . . we have such large buildups of fuel and the fires that may occur now are going to have large effects on water and erosion that the Forest Service does not seem to be taking into consideration." Further, adds another, what is compromising water quality in some areas "is *not* roads and timber management, but acid rain. The acidity of the rain and snow is not a by-product of road construction and timber management, but is the by-product of industrial pollution from outside of the area."

SOIL

Proponents of the proposed rule point to activities–e.g., road building (particularly on steep slopes), logging, and motorized recreation–as leading to soil erosion. Opponents protest, as they do with respect to watersheds, that erosion is not necessarily the result of human activities. In

fact, some writers point out, lack of management, leading to heavy fuel buildup, leads to fire, which is itself a cause of soil erosion. Explains one respondent, "Several hundred acres of the Bucks Lake Wilderness [were] reforested after a wildfire. The trees are now over 20 feet tall. They are also so thick that if a fire starts the fuel loading will create a devastating heat and the area will become a brush field again. This area is prone to lightning. There will be a great amount of erosion as the granitic soils have a tendency to float away."

AIR

Those favoring the proposed rule point to the contribution trees make to clean air as an especially important reason to protect roadless areas from development. These respondents also point to the air pollution produced by certain activities, particularly OHVs and snowmobiles, as a reason to restrict these activities. Opponents of the proposed rule, however, respond, much as they do with respect to watersheds and soil erosion, that these activities are not necessarily responsible for poor air quality. Rather, an important cause of poor air quality is lack of management, which leads to fires. These writers argue, further, that motorized recreation does not cause that much air pollution, and that chronic air quality problems on national forest lands originate outside of those lands.

Public Involvement

A great many respondents comment on the adequacy of the public involvement process. It is through this process that individuals take part in and contribute to decisions made about national forest land management. Thus comments received on public involvement issues reflect people's perceptions about how fair the process is–how responsive the Forest Service is to the concerns of individuals and user groups, and how adequate the process is in eliciting cooperation and collaboration with affected groups and agencies. In general, those who support the proposed rule comment favorably on the public involvement process, while those who do not support it believe various aspects of the process are deficient.

It is in this context that trust and integrity issues arise. By far, most comments which touch on trust and integrity come from respondents who do not support the proposed rule and believe it is being pushed through either illegally or in a manner that wholly ignores the needs and concerns of large segments of the population. Because most comments touching on trust and integrity are of this type, they may give a skewed impression of public attitudes toward the Forest Service, the documents it produces, the decisions it makes, and its overall accessibility and responsiveness to the public. Thus it is important to point out that favorable comments are also expressed–not as often or, generally, with the same reference to circumstances and details as opposing comments, but they are expressed. Indeed, judging from the overall tone of all of the responses received, it is fair to say that, despite the (often severe) levels of distrust expressed by many respondents, there is among many respondents a high level of regard for the agency itself and for the efforts it makes, both as an organization and as individual employees, to manage public lands in a way that protects the environment yet serves the needs of the public.

Comments on public involvement will be discussed with respect to collaboration with governments/agencies, the role of citizens, local versus national decision making, decision

making process and authority, trust and integrity, adequacy of the Draft EIS, adequacy of resources, adequacy of public meetings, solicitation and adequacy of public comment, and adequacy of the comment period.

COLLABORATION WITH GOVERNMENTS/AGENCIES

A number of respondents remark that the Forest Service should make greater efforts to work collaboratively with other government entities and agencies. In particular, writers stress the need to work more closely with states and counties. A number of respondents believe states should have much more say than they presently have over the management of national forests. These writers feel decisions and initiatives coming out of Washington are unduly influenced by environmental groups and do not take into account local conditions and needs. Indeed some insist that management of these lands should be turned over entirely to individual states; others maintain it should be turned over to counties. At any rate, there is considerable consensus on the part of many writers that there is a need for better multi-agency collaboration on local levels. On the other hand, some respondents favoring the proposal ask that states not be allowed undue influence over management decisions. These writers believe local jurisdictions are too much influenced by corporate interests and cannot be trusted to do what is best for the land.

ROLE OF CITIZENS

Respondents on both sides of this issue believe citizens' voices should count–that is, that the Forest Service should take into account majority opinion. Respondents differ, however, on what they believe the majority opinion is. Those opposed to the proposed rule point to polls showing most people are against closing public land as evidence that most people oppose this rule. Those favoring the rule point to polls showing most people support protecting roadless areas as evidence that most people support the rule. And respondents on both sides question the accuracy of the other's polls. A number of writers suggest that in order to get a true picture of where the public stands, a nationwide vote should be held.

Just as respondents on both sides of the issue believe citizens' voices should count, they also believe some voices should not count more than others. Both sides express resentment over what they believe to be undue influence coming from special interest groups on the other side. Those in favor of the proposed rule insist that corporate interests should not be allowed undue influence over management decisions. Those opposed insist that environmental groups should not be allowed undue influence. This latter sentiment cannot be overemphasized; for opponents, this deep resentment over the perceived influence of environmental groups makes up one of the most prominent themes running through public comment.

Not all comments on this topic, however, are so partisan. A number of writers point out the great need for compromise and, to that end, suggest the Forest Service bring in advisors from all user groups to help in formulating management decisions.

LOCAL VERSUS NATIONAL DECISION-MAKING

One of the questions on which proponents and opponents of the proposed rule are most divided is the question of whether management decisions for national forest lands should be made at the

local level or at the national level. Opponents of the rule believe, categorically, that decisions should be made at the local level. They argue that a Washington based, one-size-fits-all approach is not in the best interest of individual forests; rather, decisions should be made by local managers familiar with the land, in concert with local public involvement, so that where there are problems solutions can be tailored to specific situations. A number of opponents of the proposed rule also believe that local citizens should have more say than others over how forest lands are managed, and resent very much a process that allows people living 3000 miles away a voice in the management of *their* forests.

Proponents of the rule, however, believe just as strongly that management decisions should be made at the national level. They do not believe local managers can be trusted to do what's best for the land in defiance of local corporate and political pressure to do what's best for business. As one writer puts it, "Though less federal involvement is preferable in other areas, the 'quick buck' will often win out when local managers are faced with decisions about recreational access and logging. Protecting what is left of our national heritage . . . is a job only [the] federal government can assure." Another writer explains the local forest manager's position in more human terms: "Most of them live in small towns and naturally are sympathetic to their local friends . . . . Of course they will be influenced by friends at coffee or church. What supervisor from a little town . . . could stand up to locals who need jobs? But national forests are not his forests. They do not belong to locals either. They belong to us all."

In a nutshell, opponents of the proposed rule do not trust the national leadership to be responsive to local needs; proponents do not trust local forest managers to adequately protect the land. And local forest managers often feel stuck in the middle of an impossible situation–a situation, some insist, only made worse by the way this initiative has been handled. This point is made especially poignantly by the Forest Service Council: "We Forest Service employees are caught in the middle. We are here to carry out government policy the best that we can. But we also live in rural communities affected by the Roadless Area Initiative. Because of the way this initiative was handled by the administration, the level of distrust toward the Forest Service and its employees has reached an unprecedented level. This is very sad, because a little bit of consideration by the administration for our diverse populations could have gone a long way toward diffusing the heated situation. As it now stands, the damage that has been done to our public relations and our community support may take years to repair and rebuild."

DECISION-MAKING PROCESS/AUTHORITY

Some proponents of the rule make a point to say they approve of the process through which the proposed rule is being considered, and they approve further of the role played by the President in initiating this proposal and of the Forest Service's response in formulating the proposed rule. Opponents, however, take a different view. Many of them complain that the whole decision-making process for this rule is moving too fast, and are therefore suspicious of the intentions behind it. These writers believe as well that it is not for the executive branch to be dictating public land management. Further, they argue, the Forest Service is itself exceeding its authority, since the agency must take its directives from Congress.

TRUST AND INTEGRITY

Opponents of the proposed rule *very often* express grave distrust in both the administration and the national leadership of the Forest Service. They believe the rule is politically motivated; that the whole public input process is a façade to hide the administration's attempt to build a favorable legacy; that the proposed rule was formulated in unfair, even illegal collusion with environmental groups; that it is an attempt to bypass Congress in creating de facto wilderness areas; that the real intent of the rule is to lock people out of public lands, indeed that it is, according to some, all part of a great conspiracy involving the United Nations to deprive Americans of the rightful use of their lands; and that the decision has already been made, hence nothing they say will matter.

Proponents of the rule, on the other hand, are appreciative of the administration and the Forest Service for initiating this proposal. When these writers express distrust it is over what they perceive to be a cave-in to corporate interests. Given that, according to most proponents, the Preferred Alternative does not go far enough, one writer asks whether the real goal of the Forest Service is to save ecosystems or to appease environmentalists (with *some* protection) while continuing to allow destructive activities. At the same time, a number of proponents assert the suggested exemption of the Tongass is merely a bow to political pressure from Alaska's congressional delegation and is intended only to placate logging interests.

ADEQUACY OF THE DRAFT EIS

Some proponents of the proposed rule remark that the Draft EIS is informative and well done. By far, however, most comments on it are negative. Respondents claim that the document contains contradictions between sections, as well as between the summary and the parent document; that statements should be supported with references; that its analysis rests on faulty assumptions (e.g., that areas free of roads must therefore be pristine); and that maps are inaccurate and/or lack specific detail. Both those favoring and those opposed to the rule express concern over statements they consider to be vague, subjective, and open to interpretation. Those in favor fear the vague language leaves open too many possibilities to local managers to continue to allow activities they believe to be harmful; those opposed fear the vague language leaves open the possibility that almost any area can be declared roadless and so subject to the rule. In this vein, writers make a number of references to specific pages or sections indicating inaccurate or unclear language or analysis they feel should be corrected.

ADEQUACY OF RESOURCES

Some respondents comment that the Forest Service website is helpful and well organized. Others complain that internet accessibility of documents is poor. Quite a few respondents complain as well that requested documents have not been sent in a timely manner.

ADEQUACY OF PUBLIC MEETINGS

A few respondents commend the Forest Service for the quality and informativeness of the meetings they attended. Many others, however, complain that the meetings were held at extremely inconvenient times and locations and that presentations were not sufficiently clear and accurate. With respect to public participation, both those in favor and those opposed to the

proposed rule argue that public comment in these meetings is not, and should not be seen as, an accurate indication of public sentiment. A number of respondents, on both sides of the issue, said the meetings they attended were dominated by persons and groups representing the other side, and they felt too intimidated to stand up in the face of so much opposition and express their own views.

SOLICITATION/ADEQUACY OF PUBLIC COMMENT

Some respondents compliment the Forest Service for its solicitation of public comment and are generally appreciative of the efforts made to be responsive to the public. A number of other writers, however, question the adequacy of both the public comment the Forest Service receives and the Forest Service's consideration of those comments. Some writers, skeptical of the whole process, ask the Forest Service to give assurance that the public's comments are even considered. Others suggest that the very validity of public input is in question. Notes one respondent, "This whole process is supposedly driven by public input, the problem is that the validity of the public input is not being addressed. Instead of valid public opinion surveys based on scientific methodology, what you are doing is akin to a call-in poll and has the same inherent fault in its lack of validity." Another respondent asserts that the content analysis process used to report public comment is inadequate inasmuch as it does not provide statistics to show the actual, quantitative strength of public opinion. Another respondent claims that, given the time frame, written comments from the scoping process could not possibly have been adequately considered. "There were only 27 weeks," this person writes, "from the Oct. 19, 1999 Notice of Intent date to the May 10, 2000 DEIS release. It would take 28 people working 40 hours per week to evaluate the 365,000 responses, *if* they spent only a menial 5 minutes per response . . . . Is this a comprehensive and reasonable review of such an important topic?" Many respondents comment, in addition, that public comment is inadequate for the simple reason that the Forest Service has not given citizens enough time and information to make informed comment.

ADEQUACY OF COMMENT PERIOD

A few respondents believe the comment period on the Draft EIS was adequate and should not be extended. The overwhelming sentiment expressed, however, is that it was woefully inadequate and should be extended. The most common reason given for requesting an extension is that the comment period, as is, does not provide sufficient time to read all of the relevant documents and consider the cumulative impacts of this and other recent Forest Service initiatives, and thus to provide adequate comment. Writers ask for various extensions: 60 days, 90, 120, until September, until the end of the year, and until the current administration ends.

Forest Dependent Communities

A great many respondents are very much concerned over the effects of the proposed rule on forest dependent communities. Most of the people who address this issue are residents of such communities and oppose this rule because, among other things, they believe it will have a devastating economic impact on both their community as a whole and on individual families, and that it will destroy a way of life that, for many, dates back for generations. Although not as numerous, quite a few comments also come from those favoring the proposed rule who maintain

that the consequences for these communities will not be nearly so dire as opponents claim, and indeed that the impact will be positive. The specific issues most often addressed are the economic impacts to forest dependent communities, the impacts on local employment, payments in lieu of taxes to counties, and a particularly volatile issue for many, many writers from these communities–the adequacy of the social effects analysis presented in the Draft EIS.

ECONOMIC IMPACTS TO FOREST DEPENDENT COMMUNITIES

A great many respondents write that the proposed rule will devastate communities; many communities, they insist, are supported solely by the timber industry and will simply be wiped out by further restrictions. Many writers are equally concerned about the restrictions on motorized recreation which they believe will follow from the proposed rule. They maintain that much of their local economy is grounded in the motorized recreational industry which caters to tourists to their area. Restrict this form of recreation, they charge, and there go the tourists. Wilderness areas, they insist, do not generate tourism; rather, the availability of lands to active recreation does. Further, a number of writers argue, not only will the proposed rule devastate rural communities in general which are dependent on forest products, it will unfairly affect communities in the West, since that is where most such communities are. In fact, some writers see this as a deliberate attempt to destroy rural, western communities.

Those favoring the proposed rule, however, do not believe these communities will suffer nearly such devastating effects. They argue that small, rural economies are increasingly becoming more dependent on aesthetic and (passive) recreation opportunities than on timber, and that such communities are attractive to new business developments. Thus the proposed rule will actually help these economies. As one writer points out, “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.” This latter point, that work in forest resource industries is not dependable over the long haul, is a point often made by those defending roadless conservation. As one writer explains, it is likely the case that no extraction projects produce enough long-term, high paying jobs to justify the environmental damage they cause.

IMPACTS ON LOCAL EMPLOYMENT

Opponents of the proposed rule charge that the Forest Service has grossly underestimated the job losses likely to follow from this rule. Not only will jobs in the timber industry be lost, so will jobs indirectly related to it. In other words, these writers argue, the proposed rule will have a domino effect: as people in the industry lose their jobs, there won’t be enough money in these small towns to support other businesses. These respondents argue as well that it is fine for others to tell them they should transform their economy from one based on resource extraction to one based on recreational tourism, but the fact is, jobs in recreational tourism do not pay as well. Further, they argue, less management of forest lands will increase their susceptibility to catastrophic fires–which can hardly be good for tourism.

What is often not said in these comments, but implied, is that the sort of changes being suggested to these individuals and communities are not so easily made. For many of these writers logging

is a way of life their family has pursued for generations, it is a way of life their community is built around and in which their very identity is grounded. Moreover it is, for them, a good way of life, a source of meaning and value. To suggest they move their local economy from one based on timber extraction to one based on tourism is suggesting much more than a mere job change. It is asking them to give up one 'culture' for another; and what is often implicit in these comments is a sense of helpless frustration that changes are being thrust on them to which, they fear, they may be incapable of adjusting.

Those favoring the proposed rule are not unsympathetic to the plight of timber workers and their families and communities. Many point out, however, that ultimately the Forest Service cannot control the destiny of rural communities; there are larger social and economic forces at work here. As technology has advanced, they argue, and social mores have changed, any number of industries have had to adjust or die out–fair or not, that is just the way the world is. In this vein, a number of writers suggest that it is technological advancement, not a reduction in land available for timber harvest, that is to blame for job losses in the timber industry. Several writers also suggest, however, that the government could do much to ease the transition for these workers by instituting retraining and/or relocation programs.

PAYMENTS IN LIEU OF TAXES

One issue that often comes up in the context of impacts to forest dependent communities is the issue of funding these communities receive from the Forest Service. Because the federal government owns land (in this case, national forests) which, if owned privately would generate tax revenues to counties and states, the Forest Service makes payments in lieu of taxes (PILT) based on 25% of timber receipts. Many opponents to the proposed rule argue that it will have the effect of ending or severely restricting timber harvest, thus ending or seriously curtailing an important source of revenue to rural communities. Since the greater proportion of these funds is often earmarked for schools, respondents claim children will be unfairly affected. As a consequence, many writers insist that these communities should be compensated for this projected loss of funds. Others argue, however, that such compensation would amount to welfare, and people in these communities–proud and independent as they are–would bristle at a government handout. Still others argue that this whole system of paying communities from timber receipts should be reevaluated; surely, suggests one writer, there must be a better way to fund rural schools.

ADEQUACY OF SOCIAL ANALYSIS IN THE DRAFT EIS

The social analysis of timber workers which appears in the Draft EIS (primarily the passages on page 3-190) has stimulated an extraordinary amount of comment–entirely and categorically negative. Respondents see it as biased, condescending, and indicative of a total lack of respect for workers in the timber industry. They see it as one more piece of evidence that the national leadership of the Forest Service has been infiltrated by "radical environmentalists" who have no regard whatever for the work and value they represent. They argue that sources used for the analyses were inadequate. They claim that the conclusion drawn from the analysis–that individuals and communities can adjust to any circumstances if only Forest Service timber management policies are consistent and reliable–shows how little the Forest Service understands their true circumstances. Many writers demand a public apology. Some acknowledge the

apology that has been made but say it is not enough. Most insist that an apology and retraction should be made in the Final EIS.

The intense level of emotional reaction to this analysis cannot be overemphasized. There is already such a strong sense, on the part of opponents to the proposed rule, that this whole process is being unfairly driven by environmental groups, and that it will unfairly deprive people of legitimate access to forest lands to engage in any number of legitimate activities. Timber workers especially, whose lifeway links them so closely with the land, take great offense that an activity which sustains their families and communities–which they believe represents a valued contribution to this country's goods and services, and which constitutes as well a needed method of forest management–should be touted by environmentalists as destructive and something that should be severely restricted or outright banned. Add to that now an analysis they feel belittles and demeans them. As a result, comments on this analysis are, without question, among the most intense and volatile of all comments received.

Cumulative Effects

A number of comments received during the scoping period touched on the need for an analysis of the cumulative effects of this and other recent and ongoing Forest Service initiatives and planning efforts. Without question, though, such comments have been far more prominent this time around. Respondents note that this is the fifth major national policy initiative issued by the Forest Service in six months, the others being the proposed planning regulations, the proposed road management and transportation system regulations, the draft Government Performance and Results Act (GPRA) strategic plan, and the unified policy for a watershed approach to management. Writers note that while "these proposed rulemakings and policies have been released separately, . . . all of them are in some way directly or indirectly related to each other and to this proposed roadless area protection rule." Adding to the confusion, they go on, is the fact that "the Forest Service has failed to provide any useful information on how the many proposed rulemakings and policies are related or their cumulative impact on management of the National Forest System."

Over and over again, respondents complain they do not have enough information about the combined effects of these many proposals to meaningfully comment on them. A common refrain is that "it is unreasonable to expect the public to read and fully understand the overall management direction of the agency by looking at the individual documents in piecemeal." Rather, "The public must be made aware of how these proposed [policies] relate to one another." Further, "We have grave concerns for the number of administrative and legal challenges that these interrelationships between your agency's current and proposed policies represent." Writers also want to know what the cumulative impacts of this proposal will be in conjunction with existing environmental legislation, e.g., the Threatened and Endangered Species Act, the Clean water Act, and the Wilderness Act, etc.

Most such comments do not attribute any sinister motives to the Forest Service for failing to provide what they consider to be an adequate analysis of the cumulative effects of this and other proposals. For the most part, respondents see it as a careless, but serious lapse in analysis that it

is essential to correct. Some respondents, however, do see sinister intentions at work. According to some, "The Forest Service has purposely divided this very significant action into several parts to avoid its legal responsibilities under the National Environmental Policy Act, the Regulatory Flexibility Act and the Small Business Regulatory Enforcement Fairness Act. By separating what is, de facto, a single action into subparts, and then refusing to properly document the resultant cumulative impacts in an adequately prepared Draft Environmental Impact Statement, Cost-Benefit Analysis, and Initial Regulatory Flexibility Analysis, the Forest Service has made it impossible for the public to provide meaningful comments on either the overall proposal or any portion thereof."

Alternatives and Development of the Rule

The Draft EIS presents four prohibition alternatives, four procedural alternatives, and four alternatives addressing management of the Tongass National Forest. This represents a large number of possible combinations, and many respondents do speak to a number of those possibilities. A discussion of all of those comments within the context of this summary would be unwieldy. This discussion therefore only points out general trends in respondents' preferences. Following that is a discussion of comments regarding the development of the proposed rule.

ALTERNATIVES: GENERAL TRENDS IN PUBLIC THOUGHT

In general, respondents opposed to the proposed rule believe the Preferred Alternative goes too far. They believe enough land has been set aside already, that they have a right to use forest lands responsibly for both resource extraction and recreation, and that any further restrictions on access will prohibit needed forest management activities and deny citizens the rightful use of their public lands. Thus they support the No Action prohibition and procedural alternatives. A number of respondents–primarily from Alaska–write in favor of the No Action Alternative for the Tongass; they believe the recently completed Tongass Land Management Plan represents an effective compromise between different interests, that it offers sufficient environmental protection, and that any further restrictions would hurt rural, forest dependent communities.

Of those in favor of the proposed rule, some report that the Preferred Alternative represents a reasonable compromise, and some support Alternative 3 on the grounds that it maximizes benefits while at the same time its economic impact does not far exceed that of Alternative 2. By far, however, the overwhelming majority of these respondents support the strongest possible protection for national forests. Many ask specifically for adoption of Alternative 4D or 4DT4, or for an expanded version of 4D that prohibits all activities they consider to be destructive. More commonly, whether proponents specifically mention the alternatives or not, many ask that all unroaded areas of 1000 acres or more be protected from road building, logging, mining, oil and gas development, grazing, and other activities they consider harmful, that this protection extend to the Tongass, and that it be implemented now, not put off to the forest planning process.

DEVELOPMENT OF THE RULE

Respondents have a number of concerns related to the development of the proposed rule, including the process through which it is being considered, decided upon, and (if adopted)

implemented. Many of these concerns relate to the authority by which it is being developed; the role of the Forest Service; the role of states and counties; the role of citizens and of special interest groups; local versus national decision making; and the adequacy of the document used to present the proposal to the public, the Draft EIS. In large measure, these topics have already been addressed in this summary under public involvement; they are covered in greater detail in Chapter 2.

In addition to concerns related to these topics, respondents also raise specific questions about the rule's applicability and relationship to other forest management decisions. Some, for example, are confused over the duration and statutory authority of the proposed rule. "The summary volume," one person writes, "would have led me to believe that subsequent forest plans could undo this rule's prohibitions. On more careful reading, especially of the rule itself, I was persuaded that the rule is intended to apply until it is superceded by another rule and could not be overruled at the forest level in forest plan revision." Thus further clarification is needed. Others ask whether the proposed rule will require changes in land use designations and/or amendments to forest plans. In this vein, many writers are concerned about what the proposed rule's relationship will be to existing forest plans and what effects it will have on them. In addition, many writers believe the proposed rule should call for site-specific evaluations of roadless areas; and a number of respondents say it should not be allowed to supercede projects which have already met all legal requirements for implementation. Respondents thus have a number of concerns regarding the development, implementation, and applicability of the proposed rule.

In summary, respondents voice a number of concerns relative to access, identification of other unroaded areas, exemptions, environmental effects, public involvement, forest dependent communities, cumulative effects, and the alternatives and development of the rule. Concerns are rich and varied, reflecting as they do the rich and varied perspectives of individual citizens and groups. For the most part, however, respondents tend to support or oppose the proposed rule depending on their beliefs and assumptions regarding the nature and role of forest lands. As pointed out earlier, proponents see the rule as a positive step toward protecting what wildlands we have left, ultimately toward improving human well-being and preserving the health of our planet. Opponents see it as an assault on human freedom, an attack on their way of life, and a recipe for forest degradation. These competing beliefs shape the concerns respondents raise relative to specific issues and inform the deeply emotional character of this debate.

Overview of Chapters

Due to the highly interrelated nature of the concerns expressed by the public, the following chapters represent broad, overlapping areas. Every effort has been made to organize respondents' comments into natural, clear, and accessible categories. However, due to the common, overlapping threads which run through these issues, similar concerns often appear in multiple chapters.

Chapter 1, **Purpose and Need**, addresses the general reasons respondents give for why the proposed rule should or should not be adopted, and concerns related to the Forest Service's mission and guiding policy. This latter topic includes concerns over needed clarification of the

Forest Service's mission; National Forest System land management and environmental protection; and multiple use management.

Chapter 2, **Consultation, Coordination, and Public Involvement**, discusses public concerns regarding coordination and cooperation with governments and agencies, including tribal consultations; the rule making process, including the authority by which it is proceeding and the role of various parties; issues of trust and integrity; and the public involvement process.

Chapter 3, **Legal Issues and Concerns**, addresses respondents' comments regarding general legal issues; federal environmental acts and laws; federal land management acts and laws; mining acts; proposed legislation and acts; and treaties and tribal laws.

Chapter 4, **Alternatives and Rule Development**, covers public concerns over the development of the alternatives; the range of alternatives; suggested new alternatives; the prohibition, procedural, and Tongass alternatives; alternatives considered but eliminated; additional areas to be included in the proposed rule; exemptions; and development of the proposed rule.

Chapter 5, **Environmental Effects**, addresses public comment regarding general environmental effects; forest health; weeds, insects, and disease; fire; biodiversity; vegetation; wildlife; habitat; connectivity and fragmentation; aquatic wildlife; threatened and endangered species; watersheds; soils; air quality; and global effects.

Chapter 6, **Human Uses and National Forest System Land Management**, addresses public comment regarding general management considerations; travelway infrastructure management; commodity, extractive, and commercial activities; wildlife-dependent activities; non-timber forest products; cultural and heritage resources; recreation and travel management; and land ownership.

Chapter 7, **Social and Economic Considerations**, covers respondents' concerns regarding the social and economic effects of the proposed rule. The former topic includes comments on the social value of non-commodity resources, community and family values, aesthetic and scenic values, and the bequest value to future generations; the latter includes comments about the economic effects on small businesses and forest dependent communities, the local tax base and revenues, grazing permits and fees, costs associated with mineral and oil and gas development, and agency costs and funding.

Chapter 8, **Cumulative Effects Analysis**, addresses concerns regarding the relationship of the proposed rule to other Forest Service planning processes and proposed rules; and cumulative effects. Under this latter topic are included comments on the cumulative effects of the proposed rule in combination with other policies, plans, and programs, and the adequacy of the cumulative effects analysis in the Draft EIS.

Chapter 9, **Technical and Editorial Concerns**, covers general technical and editorial concerns; concerns over clarity of terminology; contradictory concepts; identification of specific terms and concepts; requested changes; definitions; and adequacy of maps, tables, figures, and appendices.

Chapter 1 Purpose and Need

This chapter addresses two related topics. Section 1.1, General Reasons For and Against Adoption of a Roadless Area Conservation Rule, includes range of opinion submitted by the public regarding whether or not a rule should be finalized. Section 1.2, The Mission and Guiding Policy of the Forest Service, includes concerns addressing the overarching mission of the Forest Service. These include representative opinions offered by the public about the appropriate guiding policy for managing national forests in general and roadless areas in particular. The concerns presented in Chapter 1 are in fairly broad in nature; those of greater specificity are found in succeeding chapters in the context of particular affected resources or human uses and values of National Forest System lands. See Chapter 5 for more specific environmental concerns, Chapter 6 for in-depth concerns surrounding forest management and human uses of National Forest System lands, and Chapter 7 for concerns regarding specific socio-economic topics.

1.1 General Reasons For and Against Adoption of a Roadless Area Conservation Rule.

Overall, respondents are quite polarized in their opinion of the roadless area conservation rulemaking effort. This section is organized into the following subsections: 1.1.1 Why the Forest Service Should Adopt a Roadless Area Conservation Rule; 1.1.1.1 Access Considerations; 1.1.2 Why the Forest Service Should Not Adopt a Roadless Area Conservation Rule; and 1.1.2.1 Access Considerations.

1.1.1 Why the Forest Service Should Adopt a Roadless Area Conservation Rule

A great number of respondents believe the Forest Service should adopt a Roadless Area Conservation Rule. Those who favor this rulemaking effort believe that now is the time to act to protect the remaining intact ecosystems of National Forest System lands before more of these lands are altered by commodity extraction and other human uses. Some note that roadless areas should be protected for their intrinsic value, but most point to numerous positive benefits that are derived from these areas. Many feel that roadless areas are most valuable as a reservoir for biodiversity, for game habitat, for maintenance of water quality for humans and fisheries alike, and for dispersed forms of recreation. These benefits, writers assert, are threatened by roads. Roads are one of the greatest sources of erosion, some state. Many note that roads allow increased human access, which leads to such impacts as increased litter and wildlife disturbance. Roads can result in erosion, siltation of streams, stress to native species, increased off-road vehicle use, and the invasion of non-native invasive species, others comment. Still others assert that roadless areas are more fire resistant than roaded areas. “I am a firefighter for the Plains/Paradise Fire District. Here in Montana, a majority of timber/grass fires are ignited

adjacent to roads. The statistics in the EIS support the fact that fire frequency in the roadless lands is significantly less than that in roaded lands," writes one individual.

Often supporters of the rulemaking lament that many of their favorite special wild places have already been lost to road construction, timber harvest, mining activity and increased motorized use. Many feel that the native ecosystems of the vast majority of National Forest System lands have been significantly altered by management activities, and therefore remaining wildlands should be preserved. Others note the progressive loss of open space on private land to commercial and residential development and view protected roadless areas as a critical counterbalance to these trends.

Respondents often argue that more roads are simply not needed, pointing out that Forest Service lands are already extensively roaded and ample access currently exists. Indeed, supporters claim, polls demonstrate that most citizens support roadless protection. In addition, writers often charge that roads are a net money loser for taxpayers. Many state that Americans should protect their own National Forest System roadless areas before criticizing developing nations for unsustainable forestry practices. Moreover, some writers believe the agency should not wait for specific legislation to adequately protect these areas for we have little influence over what future legislators beholden to special interests might do. Rather, one writer suggests the agency should use its rulemaking authority to protect roadless areas now: "The most effective way to limit abuse of these lands is to make future abuse more difficult by not providing the 'foot in the door' that roads, even primitive roads, provide." Others hope that the proposed rule would prompt local administrators "to manage roaded lands better in the future, based primarily on environmental considerations." Many supporters of the rulemaking express distrust of local forest management and submit that "getting the cut out" has often overshadowed other considerations; therefore, these writers urge the adoption of a strict national policy to limit the discretion of line officers to enter roadless areas. "Local decision-makers cannot be expected to maintain the roadless values of these areas without explicit direction from a federal rule," asserts one environmental organization, a sentiment echoed by many individuals. Writers believe that work needs to begin now to direct consistent management of remaining roadless areas.

Prohibiting road building is the very least the agency can do, many conclude. Few, however, feel that the Preferred Alternative in the Draft EIS goes far enough toward effective roadless area protection. Many ask that the Forest Service protect all National Forest System roadless areas, both inventoried and uninventoried, of at least 1000 acres, from all activities they believe are destructive. This includes not only such as road construction but logging by any method, mining, livestock grazing, and motorized recreation, they say. Most also request that the Tongass National Forest be included in the final rule and that the Forest Service provide interim protection for other unroaded areas through project-by-project analysis as a transition to the forest planning process. Many proponents urge the Forest Service to remove recently built roads in order to enlarge roadless areas and restore inventoried roadless areas to their original RARE II size. Some writers suggest that roadless areas should be managed with guidelines similar to those of designated wilderness areas. While not all proponents suggest that level of restriction, there is a general consensus among these respondents that roadless areas should be strictly protected. Indeed, writes one respondent, "We do not know the effect of loss of biodiversity in these areas…Until [we do], the best long-term alternative is to not disrupt these remaining

natural systems in any way." Some writers also request that a time frame be added to the final rule to assure that roadless areas should be kept roadless essentially in perpetuity.

A number of critics believe that the alternatives presented in the Draft EIS do not meet the purpose and need described in the Notice of Intent. "You started this project off with a mandate from the President that would have allowed you to protect vast areas of our National Forest System unroaded lands, to preserve their unique characteristics over a long period of time. The Alternative that you have chosen does not reflect any portion of this vision," laments one respondent, an expression of dismay echoed by many others. They maintain that the scope of the rule should be returned to its original intent, to protect 60 million acres from all damaging activities. Most assert that road construction is only one of many such activities, and many feel that commercial timber harvest is far more detrimental to ecosystem integrity than road construction alone. Some respondents assert that logging promotes insect outbreak, reduces resilience to disease, and increases fire danger by removing the most fire-resistant forest components. Thus, given the Forest Service's failure to ban logging, this detrimental effect "immediately contradicts the Forest Service's stated reason for carrying out the project described in the purpose and need by creating the opposite effect," one writer charges.

Public recreational access is heated topic for most respondents, whether they are in favor of or opposed to the rulemaking. Given the dramatic increase in recreational use of the national forests, the public perceives a very direct personal effect from travel management decisions. Given that forest roads of all kinds are the primary means of access to the national forests for many recreationists, relatively few members of the public separate road infrastructure management issues from travel management decisions. As a result, some note, the rulemaking has generated a firestorm of opposition due to a perceived loss of access. Many proponents of the proposed rule therefore urge the Forest Service to clarify that this proposal would not lock anyone out of national forests or roadless areas. The proposed rule, they point out, does not close any existing roads or trails or limit access for recreation or other uses.

Finally, some respondents who identify themselves as senior or disabled citizens write in support of the proposed rule. They state that even if restrictions on road construction do limit access to roadless areas, it is more important to preserve them. "I am an older person, no longer able to get myself into remote regions on foot. It does not matter that I cannot personally enjoy roadless areas. Their existence is enough in themselves," writes one individual. Other respondents who identify themselves as seniors or disabled maintain that they still prefer to walk for health reasons and that the proposed rule does not hinder their enjoyment of national forests. Indeed, a number of writers claim the entire "senior citizen access" argument is weak, irrelevant, and lacks credibility. As one respondent notes, "If I have a desire to take a motorized drive through some of our public lands, I have access to thousands of miles of federal, state, county, and Forest Service roads that traverse the same types of areas and geography that is proposed to be protected from further road building. I think the excuse of being denied access because of age or impairment is a weak one." According to another respondent, the concern about access for senior citizens and the disabled "is a concern more often raised by those who have a special interest in motorized access to our nation's wild areas rather than any interest in addressing the full range of accessibility issues that are of greater priority for people with disabilities."

Public Concern: The Forest Service should adopt a Roadless Area Conservation Rule.

The proposal by the Forest Service last October to protect 60 million acres in our national forests represents a wonderful, bold and intelligent step in our national life. It will, of course, encounter enormous resistance but I think the majority of Americans can see far enough into the future to realize the time to take such a measure is now, not when roads, settlements, businesses, alluring but elaborate vacation spots have all been put in place by commercial interests. These enterprises have enormous tracts of land for scenic and recreational enjoyment. Please give your energetic best to support the possible regulations in favor of roadless areas. (Individual, Machias, ME - #998.10000)

I wholeheartedly support the Forest Service's initiative to protect up to 60 million acres in our national forests from road building, logging, and other activities that could harm their wild character. Such a step is vital if we are to protect critical drinking water supplies and wildlife habitat. (Individual, No Address - #353.10100)

I know that all this would be a huge change from the Forest Service's former (at least it appeared to be) mandate of helping loggers " get the cut out", but subsidized destruction of our forests isn't in our best interest anymore. (Individual, Hydesville, CA - #3524.93644)

Building roads to protect from fire is not justified. Human access and logging activities can increase fire danger. Larger, more mature trees are more resistant to fire than thin crowded stands of second growth after logging. And precisely because of natural fire, more natural areas need to be set aside to preserve them after one area burns. (Individual, West Linn, OR - #706.84200)

ACKNOWLEDGE THAT ROADLESS AREAS ARE MORE VALUABLE FOR THEIR NON-COMMODITY RESOURCES

The best policy for federal lands takes into account that they are owned by the public and thus subject to careful and respectful management just as someone would treat another person's property. Reverse incentives such as "purchaser road credits" and the Knutson-Vandenburg of 1930 degrade and destroy forests for short-term gain at the expense of long-term integrity. As reported by the American Viewpoint survey last January, 76% of the citizenry support roadless protection and I solidly stand among them. (Individual, Morrisville, VT - #911.10100)

There is no longer any valid economic reason (timber subsidies at taxpayer's expense) to build more roads. Roadless areas have much more value in the tourism, recreational and commercial fishing, and subsistence uses they will provide for future generations. (Individual, Sitka, AK - #18578.92300)

Preserving natural environments provides a wide array of benefits to society (Krutilla and Fisher 1975). Those benefits include on-site non-motorized recreation use, scientific research, biological diversity, and habitat for fish and wildlife, (U.S. Forest Service 2000). Although lands need not be formally preserved to provide these values, some form of land protection is needed to ensure that these values continue into the future. (Individual, Dickinson, ND - #16095.90200)

PREVENT THE DETRIMENTAL ENVIRONMENTAL EFFECTS OF ROADS

Roads have been a great environmental problem in our national forests, second only to clear cutting. They erode fragile areas, stress native species, invite off-road vehicles deep into pristine areas, and provide for the invasion of non-native species. Worst of all, they are proven money losers for taxpayers. We underwrite the expenses of logging companies that then proceed to destroy a prime national asset. There is far more value in our forests for their positive environmental impact, for their habitat, and for passive recreation like hiking and backpacking. (Individual, Normal, IL - #332.10100)

The quickest and most successful way to protect forests and watersheds is to stop roading in the forest. Study after study both private and public has confirmed that one of the greatest sources of erosion in forests is the road system. Further roads are not needed. The Forest Service now has one of the largest road systems on the planet. (Individual, Neosten, OR - #392.10100)

Preventing roads from being constructed that would run through the untouched areas is the least we can do to protect the forests. Building roads does not just mean building roads, it leads to buildings (bathrooms, gift shops, restaurants). It will also lead to increased litter on the immediate areas surrounding the road. (Individual, No Address - #328.10100)

LIMIT ENVIRONMENTAL DEGRADATION DUE TO GREATER HUMAN ACCESS

America is already covered with one of the most extensive and efficient networks of roads found anywhere on the globe. Over 386,000 miles of roads today crisscross our national forests, providing access to beautiful sites for recreation and other uses, including logging. Further road construction, or logging in currently roadless areas, will only degrade the precious remaining acres of currently roadless forest, diminishing water quality, habitat connectivity and other critically important wildlife values. (Individual, Sierraville, CA - #1491.83000)

During the past 35 years I have watched the Trappers Lake area in the White River National Forest fade from the once almost wild place it was to become like a city park recreation area. The fishery has steadily deteriorated and it will never be the same. One day the pure native cutthroat will be gone. And all of this was begun back in the late 60's so that "more people" could enjoy this experience. That experience has now been lost forever. Trappers Lake will never be the wonderful natural place it was. The lakeshore and water become more filled with trash each year. The native fish will in time be lost as the brook trout take over and interbreed. The campground is a den of noise with generators on RV's (which should be relegated to KOA campgrounds and not allowed in National Forests), four-wheel motorized vehicles and children riding around on their bikes just as if they were home. This is enjoying the great out of doors?? Everyone loses in this scenario. Making Trappers Lake very accessible to any and all has lessened the experience for all. (Individual, Grand Junction, OR - #7570.91600)

ACKNOWLEDGE THAT ROADLESS AREAS ARE LESS FIRE-PRONE THAN ROADED AREAS

[Opponents'] concerns were that if this land was set aside as roadless then how could it be managed without access? This is ridiculous; these lands survived just fine without roads prior to the white culture's arrival in the west. Another point was that a lack of roads would hinder fire protection. I am a firefighter for the Plains/Paradise fire district. Here in Montana, a majority of timber/grass fires are ignited adjacent to roads. The statistics in the EIS support the fact that fire frequency in the roadless lands is significantly less than that in roaded lands. . . . . Wilderness advocates are many, they pay taxes and want to save these lands not for profit but because it is what is best for the forest. (Individual, No Address - #18287.10100)

In the seven years I have lived in Montana, I have paid close attention to the impacts of unsustainable logging practices and roadbuilding on mountain ecosystems. The visible and undeniable consequences of these practices have been an everyday reality for me as a modern homesteader. . . . . The practices of recent history are neither healthy nor sustainable. The logging of the past has involved cutting the largest, healthiest trees which traditionally withstood fires and reseeded the forest for future generations. To this day logging practices place convenience over sustainability. If roaded areas had been sustainably managed, there would be neither the "need" nor desire to cut more roads . . . . and a moratorium on further roadbuilding is a long-overdue step in the right direction to a sustainable future. (Individual, Lolo, MT - #11083.10100)

HALT THE LOSS OF REMAINING INTACT FOREST ECOSYSTEMS

I grew up in East Tennessee and enjoyed truly wild areas in Cherokee and Nantahala National Forests. Almost all of the places we camped and hiked have been roaded, logged, and some clearcut. Let's not allow that in the tiny bit of roadless areas left. (Individual, Boise, ID - #10978.10100)

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)

In my youth, I think that most people sort of had a notion that there would always be plenty of wild country. A road here, a road there. Log this pristine drainage, log that one. But every time you build one of those roads, the

wilderness gets pushed back just that much more. And pretty soon, we were all looking at a place that had changed more than we expected. Wildlife habitat had been altered and fragmented. Security areas and travel corridors had been removed and cut off. Spawning areas had been silted in or rendered inaccessible because of poorly placed culverts. "Road hunting" became a favorite fall activity in the Swan. And conflicts between wildlife use and human use had increased dramatically. Today, that valley is not the same place that enriched me so as a kid. And that is only one valley. Similar changes have occurred all across the mountain country of Montana. Much of what was so recently wild, much of what has taught us, challenged us and sustained us over the years is no more. And of course, we cannot replace the wild country that we have lost. (Individual, Choteau, MT - #422.10100)

Please protect what is beautiful and natural in this country. Since YOU have the power and are making a decision that will affect ALL of US, I beg you to conserve ALL the wildland WE have left. I can't tell you how many of my friends and family that are in agreement who want YOU to continue…keeping OUR forests the way they are and improving, in some cases. Please protect OUR UNROADED areas. (Individual, No Address - #1324.10000)

I have been to many National Forests during my life, and I have seen many beautiful places. Unfortunately, I have also seen too many places devastated by logging and other destructive activities. (Individual, Boulder, CO - #7599.93300)

END THE NET LOSS TO TAXPAYERS OF ROAD CONSTRUCTION

The value of using the forest for hiking, camping, fishing and hunting, plus old growth ecosystem protection are all more important than losing taxpayer money and ruining the landscape with below-cost timber sales. (Individual, Marion, AR - #938.90000)

I also object to the fact that my tax dollars have been used to subsidize access for the timber and mining industries who clear cut our national forests, pollute our streams, and further endanger wildlife species. (Individual, Atlanta, GA - #19482.90000)

Economics enter into the argument. Let us talk money. Subsidies for road building cost the taxpayer three times: $ to build the road, $ to maintain the road, $ to mitigate the direct and indirect damage they cause to our environment (loss of water quality and species diversity). (Individual, Bellingham, WA - #1954.93000)

SET AN EXAMPLE FOR THE WORLD

The United States has been blessed with a multitude of beautiful, wild places. It is our duty as forward thinkers to set an example to the rest of the world of the importance of protecting these precious resources. (Individual, Portland, OR - #4368.10100)

If we are indignant about the Brazilians destroying the rainforest--we need to clean up our own act first. Cutting ancient forests is a crime of enormous magnitude. (Individual, Bayside, NY - #1424.10100)

ENCOURAGE IMPROVED STEWARDSHIP OF ROADED AREAS

In most western states, about half of the national forest lands have roads and will be under no management restrictions. In addition to protecting the roadless areas, [the proposed rule] will hopefully also serve as a reminder to local administrators to manage roaded lands better in the future, based primarily on environmental considerations. (Individual, Providence, UT - #4016.10100)

You and the timber companies need to better manage those areas already affected. How about a more rigorous effort to regrow and harvest trees in all those clearcuts on the Clearwater and Panhandle National Forests? Manage your timber needs from the roads that already exist, and leave the roadless lands alone. NO MORE ROADS! (Individual, Boise, ID - #7732.84600)

DETER FUTURE LEGISLATIVE ABUSE OF PUBLIC LANDS

A problem with attempting to limit use/abuse of these lands via legislative means only is that we have little control over what future legislators will do to try to satisfy the particular interest groups to which they are beholden. The most effective way to limit abuse of these lands is to make future abuse more difficult by not providing the 'foot in the door' that roads--even primitive roads--provide. We have too many roads in formerly pristine areas now that should never have been built. (Individual, Boston, MA - #2337.41300)

LIMIT THE DISCRETION OF LOCAL PERSONNEL TO ENTER ROADLESS AREAS

This policy is of particular interest to me and many of my friends and colleagues here in Wyoming because our local Forest Service officials are so obsessed with cutting timber that they cannot even be trusted with these special areas. . . . . For years, the people of southeastern Wyoming have begged and pleaded with these officials to spare some of our forest from the chainsaw, and they have answered our request with nothing but more clearcuts. (Individual, Laramie, WY - #9244.10100)

Local decision-makers cannot be expected to maintain the roadless values of these areas without explicit direction from a federal rule. (Environmental/Preservation Organization, Chapel Hill, NC - #52231.64240)

Your 1995 proposals first emphasized ecosystem goals and scientific understanding. Only five years have passed! Your work on habitat and watershed preservation has hardly begun! . . . Do you realize that when these local officials were getting their educations, there were no classes in eco-sciences? Local control will favor exploitation and careless economics. The Forest Service must go forward with its eco-management. Please immediately halt all road-building in the inventoried roadless as well as the un-inventoried roadless areas. Then as you do on-going planning, insure this protection from any further exploitation. (Individual, Cottage Grove, OR - #54552.64250)

We are frustrated, angered and disgusted when we drive, hike, ski, bike etc. in our National Forests and see the devastation and aimless destruction of clear-cutting and excessive roadbuilding, and then realize it is supported by our tax dollars. Now we have all heard the arguments on both sides of this political, environmental and social issue: jobs, forest fires, disease, bugs, water, air, habitat, our children and grandchildren, etc. We are reasonable people and we wish there was a way to come to a compromise, but it is too late for that. Unfortunately due to decades of mismanagement and abuse of our public lands and mistrust of the Forest Service and the timber industry it has come down to an ALL OR NOTHING SITUATION. AND WE AS CONCERNED CITIZENS VOTE FOR NOTHING!! (Individual, Portland, OR - #53057.10100)

Public Concern: The Forest Service should strengthen the Preferred Alternative to prohibit all destructive activities and include the Tongass.

Please provide immediate and lasting protection for all national forest roadless areas, both inventoried and uninventoried, of at least 1000 acres. Prohibit all roads, logging, and other destructive activities associated with roads, such as off-road vehicles on those lands. Please do not exclude the Tongass National Forest i.e., no loopholes, exemptions, or waivers. Provide interim protection for other unroaded areas through project-by-project analysis as a transition to the Forest Plan process. Thank you for your kind attention to this matter. Our roadless areas are very valuable to us. (Individual, No Address - #45.10100)

From your public statements, it seems that you have interpreted this mandate as narrowly as possible. The whole point of preserving a roadless area is protection from any destructive activities, not merely protecting it from roads. (Individual, Aloha, OR - #890.10110)

I am studying the roadless DEIS and, though I'm encouraged by the direction the FS is heading, I don't think the protection your preferred alternative offers is enough. Commercial logging should not be allowed in roadless areas. The separation of the Tongass Forest from the rest of the system concerns me. Roadless areas of that northern wilderness should remain roadless and should exclude mineral exploration and logging. Logging and roads have done more to damage our precious landscape than any other human activity. Please take advantage of the popular

citizen desire to preserve the ecological integrity of our public lands by installing the highest level of environmental protection possible. (Individual, Chico, CA - #506.10110)

Mining, logging and cattle grazing have no place in these precious forests. (Individual, Eugene, OR - #157.10100)

While I am thrilled at your upcoming proposal to end road building in our national forests, I am concerned that your proposal does not go far enough. Banning new roads is very important in protecting wilderness; it is also vital to stop logging completely. How do you expect to protect something if you're removing bits and pieces from it?? Also, why not ban ATV recreation in sensitive areas that need extra care to recover? These destructive practices need to be banned right along with road building in order to grow healthy forests. (Individual, Playa Del Rey, CA - #428.10110)

I would like to see you go further and ban road building, logging, mining, off-road vehicles and, if you have lakes, personal water craft. (Individual, Greenbrae, CA - #973.10110)

Because of the triple impact of logging, mining and urban sprawl, our "wildlands" are quickly disappearing. Once roads appear in these areas it automatically leads to more roads and the environment is permanently impacted. If nothing else the PLAN is actually TOO limited. It still does not prevent INDIVIDUALS and ATV users from creating their OWN roads. (Individual, Helena, MT - #2631.10110)

The Forest Service should go further than just securing these roadless areas into a permanent roadless state. Especially in the eastern and other high population areas of the U.S. Recent roads should be closed making these areas larger. Then no logging by air or any other method should be allowed. (Individual, Talking Rock, GA - #800.10110)

I support the following position: THE FOREST SERVICE MUST PROVIDE STRONGER PROTECTION FOR BIODIVERSITY THAN IS PROPOSED IN ITS DEIS "PREFERRED ALTERNATIVE." THE TONGASS NATIONAL FOREST AND SMALL ROADLESS AREAS MUST BE PROTECTED IMMEDIATELY, AND LOGGING AND OTHER ACTIVITIES MUST BE EXPLICITLY EXCLUDED IN ROADLESS AREAS. Here's why: We do not know the effect of loss of biodiversity in these areas. We can make some pretty good claims about the effects of deforestation on water quality as well as loss of biodiversity. Until we can answer these concerns adequately, the best long-term alternative is to not disrupt these remaining natural systems in any way. (Individual, Waverly, IA - #1332.10100)

I support the immediate and permanent protection of all 60 million acres of the last unprotected wild forests found in our National Forest System, especially those in Alaska's Tongass Rainforest, from all logging and road building. These wild forests are important for biological and watershed protection, and they are also places for spiritual solitude and prayer. Once they are gone, they're gone forever. (Individual, Elma, NY - #50636.10100)

I write to IMPLORE you to extend the President's directives to include the Tongass with 60 million acres of roadless National Forest. (Individual, No Address - #44232.10110)

I support…much stronger roadless area protection than is currently provided for in the Roadless Area Conservation DEIS. Remaining roadless area regulations should be much the same as are currently applicable to Wilderness Areas. (Individual, No Address - #865.10110)

Public Concern: The final rule should assure that roadless areas are protected in perpetuity.

Keep roadless areas roadless in perpetuity! Repair/maintain existing park roads instead! (Individual, La Jolla, CA - #2152.71300)

As an American citizen who understands how our future economic prosperity entirely depends on the common sense of sustaining the earth's environment, I support the greatest possible amount of remaining roadless acreage to be protected in perpetuity. (Individual, North Bennington, VT - #16715.10100)

If it is to be roadless then prohibit any change of designation for say 200 years. (Individual, No Address, - #25308.64252)

Public Concern: The scope of the final rule should be broadened to meet the stated purpose and need.

You started this project off with a mandate from the President that would have allowed you to protect vast areas of our National Forest System unroaded lands, to preserve their unique characteristics over a long period of time. The Alternative that you have chosen does not reflect any portion of this vision. The result of your regulation will mean that MOST of the late-successional/old growth forest remaining on national forests would still be unprotected. You cannot successfully protect the tattered remains of the forest ecosystems that you administer by establishing a series of 5,000-acre islands amidst seas of clearcuts, and deforestation. Indicator species across the national forest system are in decline. You can only protect what remains on national forests by ending all destructive activities including logging, mining, and grazing in these last remaining wild areas. You have failed to meet the mandate of the President, you have failed to meet the stated purpose and need for this action. You should reissue a Draft EIS on this policy--one that actually takes a "hard-look" at what is necessary to protect these areas. (Environmental/Preservation Organization, Pasadena, CA - #29927.10110)

The scope of the study should be returned to the original 60 million [acres], no roads, no logging. (Individual, Olympia, WA - #538.64150)

I urge you to amend the draft plan for protecting our nation's forests. The draft plan fails to reflect the forest protection vision articulated by President Clinton last October and embraced by the public. It contains some glaring loopholes that leave millions of acres of forest wilderness vulnerable to logging and other destructive activities. While the draft plan would prohibit road building in roadless areas, it still allows logging in these areas. Timber companies are very adept at logging in roadless areas using helicopters, skid trails and other creative methods. Allowing logging in these areas, even while prohibiting roads, will not provide any real protection for the last of our wild forests. It is important to protect these irreplaceable lands as wild forests provide places to hike, camp, and fish for millions of Americans, habitat for wildlife and sources of clean water for communities. (Individual, Redwood City, CA - #4759.10110)

Logging will have the effect of reducing canopy cover in the stands, reducing canopy layering and vertical diversity and reducing the potential for snag and downed log recruitment in all size and age classes. Logging will have the effect of serving as a mechanism to promote insect outbreak…or to reduce resilience to insect outbreak…. This immediately contradicts the Forest Service's stated reason for carrying out the project described in the purpose and need by creating the opposite effect and contradicts the statements regarding the effects of managing and not managing. This points to three failures on the part of the agency: (1) The failure to describe a purpose and need to which the agency is responding. (2) The failure of the documentation to mention a single piece of this scientific evidence that contradicts the agency conclusions. (3) The failure, with a poor quality of scientific information and justifications, to acknowledge that any controversy around their conclusions exists. (Environmental/Preservation Organization, Weldon, CA - #16041.54100)

1.1.1.1 Access Considerations

Public Concern: The Forest Service should clarify to the general public that the proposed rule does not close any existing roads or motorized trails or limit public access to national forests.

I keep hearing folks say that the intent of the proposal is to "deny access." I don't see it that way. For example, here in Idaho there are already about 24,970 miles of forest roads in Idaho, and an additional 11,677 miles of motorized trails for dirt bikes and all-terrain vehicles. Nationwide the forest road system is some 380,000 miles in extent. The President's proposal would not close any existing roads or motorized trails, or limit recreational access to our public forests. (Individual, Idaho Falls, ID - #6836.91000)

Opponents of the proposed policy assert that it will lock the public out of the forests, ban off road vehicle use, increase the threat of wildfire, degrade wildlife habitat, and threaten timber supplies. None of these claims is true. The proposed policy closes no roads. It bans no public uses of forests. (Environmental/Preservation Organization, Eugene, OR - #19306.10100)

Access is not a problem on the National Forests, due to 400,000 miles of roads which already exist. I use the National Forests extensively and while one can't access every ridge and every tree from a vehicle, access is quite good. In some cases one might have [to] walk as far as five miles but usually much less than that. A recent study showed that the furthest point from a road was 20 miles. (Individual, Spokane, WA - #19743.10210)

Public Concern: The Forest Service should dismiss the "senior citizen and disabled access" argument against the proposed rule.

THE NEED FOR PRESERVATION OUTWEIGHS THE NEED TO PROVIDE ACCESS FOR THE ELDERLY AND/OR DISABLED

It is time for public lands to be preserved for future generations, even if this means limiting access to people like myself who have a disability and cannot hike (old polio) like they once managed to do. (Individual, Waynesville, NC - #1321.10213)

I cannot attend the Public Hearing on Roadless Areas in Grand Junction on June 27th because I am housebound in a back brace. I can no longer hike in roadless and wilderness areas but certainly do not want roads to be built for me. (Individual, Hotchkiss, CO - #6885.10110)

By the way, I am a physically disabled person who STILL prefers to walk in pain rather than pollute my outdoor experience with the noise & smell of ORVs. (Individual, Idaho Falls, ID - #18251.10213)

I am an older person, no longer able to get myself into remote regions on foot. It does not matter that I cannot personally enjoy roadless areas. Their existence is enough in themselves. (Individual, San Fidel, NM - #5122.90200)

IT IS NOT A VALID ARGUMENT

If I have a desire to take a motorized drive through some of our public lands, I have access to thousands of miles of federal, state, county, and Forest Service roads that traverse the same types of areas and geography that is proposed to be protected from further road building. I think the excuse of being denied access because of age or impairment is a weak one. (Individual, Preston, ID - #7648.10213)

On the forests that I frequent in Wyoming and Colorado, we already have too many roads. I cannot see how anyone, including the disabled, can claim that they do not have adequate access to our forest lands for recreation with the roads that we have now. (Individual, Laramie, WY - #17892.10110)

I think it's a big myth of the general public that people with disabilities are going to be locked out of wilderness if a road is not present. I like to think that where there's a will, there's a way. I for one can be very creative about coming up with ways for handicapped children to access roadless areas, wheelchairs or not. (Individual, Salt Lake City, UT - #21978.10100)

I'm…VERY tired of the old saw: "My mother (grandmother, whatever) can't get there unless I drive her." Too Bad! She should have thought of that while she could still use her feet, get off her duff, & WALK. I'm 80 years old & can still hike a mile or two & I DON'T want anybody MOTORING me into our forests. (Individual, Jerome, AZ - #13455.10213)

I would like to feel that, when the time comes, I will be gracious enough to say that I've had my turn and enjoyed it immensely. HOWEVER, I prefer to LEAVE THE SAME BEAUTY AND EXPERIENCE FOR OTHERS TO ENJOY AFTER ME, not to whine to have someone ruin more acreage just to get "me-me-me" up into the mountains. I feel that "senior citizen access" is a red herring, and a self-centered argument that should be dismissed as irrelevant to the conservation issue. (Individual, Buffalo, WY - #12161.10213)

The concern that full protection of roadless areas would deny seniors, families, and people with disabilities access to our public lands does not hold up to scrutiny nor does it represent our views. It is a concern more often raised by those who have a special interest in motorized access to our nation's wild areas rather than any interest in addressing the full range of accessibility issues that are of greater priority for people with disabilities. Currently people with disabilities are faced with numerous barriers because of the inaccessibility of facilities, accommodations, developed campsites, and the front-country trails enjoyed by most of the visitors to our national forests and other public lands. Similarly, motorized access in roadless areas itself would act as a barrier to persons whose disability stems from a sensitivity to pollutants or poor air quality. (Professional Society, Rockville, MD - #29109.10100)

1.1.2 Why the Forest Service Should Not Adopt a Roadless Area Conservation Rule

Respondents' arguments against the adoption of a Roadless Area Conservation Rule fall roughly into two categories: arguments which focus on the overall need for such a policy or advisability of limitations on management activities in roadless areas; and arguments which focus on the public's right to access National Forest System lands and growing frustration over what is perceived to be an ever-increasing number of restrictions.

With respect to the advisability of a national set of prohibitions, some respondents argue that this approach to roadless protection is unnecessary and is poor policy. Many feel that the detrimental effects of roads are greatly exaggerated, and that modern road building techniques are environmentally sound. Many others feel that there are already enough portions of National Forest System lands set aside under protective classifications, and thus a special designation for roadless areas is unneeded. Others claim that because many roadless areas are adjacent to designated wilderness areas, the proposed rule would not likely provide additional benefit. Further, opponents claim, many roadless areas have already been evaluated for and released from wilderness designation and thus have been determined to be more suitable for other purposes.

Many writers view national forests from a utilitarian perspective, and feel that the highest and best use for these forests is as a source of lumber and raw materials. Diseased and dying trees are therefore seen as wasted and lost to human use, or worse, a source of increased risk of catastrophic fire. "Given that inventoried roadless areas comprise more than twelve-percent of the 24 million acres of National Forest land in the Intermountain West that have been identified

to be at high risk of catastrophic fire, I am concerned that the rule as proposed may unwisely limit the agency's management options," remarks a concerned Minnesota resident. This is a view held by many opponents of the proposed rule. Many feel that the Forest Service has failed to adequately consider forest health issues in the Draft EIS, and cite the recent fires in Los Alamos and throughout the west as justification for this view. Many opponents of the rulemaking argue that actively managed forests are healthier than forests where natural processes are allowed to predominate. Many feel that implementing the proposed rule would only lead to more management problems than it would solve. The Forest Service should be able to adapt to changing circumstances, they believe, and this rulemaking could restrict agency personnel from being able to respond adequately to management needs in the future.

In short, opponents of the proposed rule argue both that neither is further protection warranted nor is it in the best interest of the land itself. Many respondents go on to question the stated purpose and need for such action and often express the belief that there are already enough laws and regulations in place to adequately protect roadless areas. For example, notes one writer, "All actions on national forest property are subject to the provisions of the National Environmental Policy Act, the Clean Water Act, the Endangered Species Act, and Section 106 of the National Historic Preservation Act." Adherence to these existing laws and regulations "would ensure continued environmental protection within the boundaries of national forests." Furthermore, people assert, roadless protection is an issue already addressed in forest plans; this rule, therefore, would only add another needless layer of bureaucracy to the whole system.

Opponents also claim that the Forest Service has failed to identify a compelling need to limit certain activities. "A statement that certain activities *can* degrade certain characteristics," asserts one writer, "does not represent a compelling need to limit these actions." Opponents write, further, that the proposed rule won't really solve any problems. Humans are part of the environment, these writers note, and it is naïve and unrealistic to think we can "revert to what America was like in pre-Columbian times." Some writers believe that the Forest Service faces more pressing management issues than roadless areas and suggest that the agency focus its resources on other priorities.

One major reason cited by many respondents for their opposition to the proposed rule is the belief that it will limit access to public land. They claim that the American people are entitled to reasonable access; that this rule will affect access to places that have been historically accessible by road, that it will cut off access to adjacent lands, or that it will deprive future generations of use of the national forests. Opponents also claim that the proposed rule will limit access for recreation and for the elderly, the disabled, and virtually all persons who are not wealthy. As one writer argues, "Only the wealthy can afford the gear, professional guides and outfitters, horses, and even time required for forays into wilderness. Otherwise one must be young, healthy and unencumbered by family to make backpacking an option." In either case, this writer concludes, "The vast majority of us are denied access to anything but the perimeter of wilderness areas."

Many opponents express significant misgivings regarding the current direction of policy-making at the national level by the Forest Service. Many simply feel that forest management decisions are most appropriately made at the local level by decision-makers using site-specific information. However, many others express strong distrust in the federal government and

believe that the real intent of this and other recent proposals is to deny American citizens legitimate access to public lands. While not all opponents see a sinister motive, most opponents of the proposed rule are concerned about access and many insist in unequivocal terms that as taxpaying citizens they have a right to access these lands which neither the federal government nor the Forest Service may infringe upon. It should be noted that some of the most emotionally-laden responses in opposition to the proposed rule are those which focus on the public's right to access. The fear that access may be curtailed elicits an intense reaction many citizens, self-identified motorized users in particular. Many opponents of the rule frame their opinions in the context of the principles of individualism and freedom they feel are enshrined in the Constitution of the United States.

Public Concern: The Forest Service should not adopt a Roadless Area Conservation Rule.

I'm opposed to the President's roadless initiative because it bypasses the local forest planning process and eliminates/reduces recreational use of the forest by the public (except for the FEW hikers/backpackers). In a time when we should be MANAGING our forest resource for multiple uses, this policy proposes to lock up additional land, effectively creating additional wilderness. This flies in the face of the laws which govern our National Forest Management. (Individual, Hotsprings, VA - #1224.10220)

And as a State Land Board commissioner for the past ten years, I have learned a fair amount about the management of forests, forest ecosystems and forest life cycles. I pride myself on keeping abreast of the issues affecting Idaho's natural resources and environment. When I learned of the proposal to set aside approximately 9 million acres of Idaho's forest, I was very concerned. My first priority has always been with preserving the livelihoods of the working families. However, this was not my only worry. I was also concerned about our nation's need to preserve beautiful wilderness areas. However, after reviewing the plan, I determined the potential negative impacts that would ensue are obvious and far reaching, particularly for Idaho. This action is contrary to sound forest management and practices and it is monumental policy shift from current procedures without proper due process. It jeopardizes the economy of working families and places millions of acres of Idaho's forest at risk of catastrophic fire. As a western state, Idaho is impaired by the percentage of land owned by the federal government. (Individual, No Address - #21156.10200)

I am opposed to the roadless Draft EIS. I think these public lands should be available for use by vehicle, both logging and recreation. This is a land grab that far exceeds the need to keep America's taxpayer-owned lands pristine and undisturbed. Please, do not adopt this plan. Leave things the way they are now.
(Individual, San Antonio, TX - #2206.10200)

MODERN ROADBUILDING IS NOT HARMFUL TO THE ENVIRONMENT

Modern road building techniques do not damage our forests. Research not only shows the new roads are better but also benefit both the ecosystem and those who use them. (Individual, Spokane, WA - #3293.10200)

Roads have been and can continue to be constructed and maintained in a manner to reduce or eliminate any measurable effects to water quality. (Individual, Lake George, MN - #2209.10200)

THERE IS ALREADY ENOUGH DESIGNATED WILDERNESS AND PROTECTED LAND

Most of the roadless areas are adjacent to existing Congressionally Designated Wildernesses. Not building more roads into these areas or maintaining existing roads will not have many benefits that aren't already present due to the established Wildernesses. Wildlife habitat requiring no roads, solitude for people, and natural areas are present in sufficient amounts within the existing designated Wilderness areas and the network of Research Natural Areas. (Individual, Lake George, MN - #2209.10200)

Nobody gains by locking anybody out. We have enough wilderness areas, and ending road building is not going to solve anything. Whether we like it or not, man is a part of the environment. Environmentalists believe that by restricting access, we can revert to what America was like in Pre-Columbian times. This is naïve and unrealistic. I firmly believe [there] is nothing wrong with the current policy. (Individual, No Address - #207.10200)

SOCIETY SHOULD MAKE USE OF RENEWABLE TIMBER RESOURCES RATHER THAN ALLOW THEM TO BE WASTED

It seems ludicrous to me to even contemplate the thought that the resource these dead trees represent might be wasted. (Individual, Manti, UT - #44314.10200)

The forests need to be managed and logged. We have dead & dying trees from disease & insects & a threat of fire is just waiting to happen. We already have many miles of forest roads gated and closed to vehicles. We had a ballot poll on the Roadless issue and nearly 16,000 people said "NO" to federal forest policies. (Individual, Columbia Falls, MT - #13350.10200)

We as taxpayers and users of national forests are convinced that trees are a renewable resource. The Forest Service Roadless Area Conservation Draft EIS and proposed rule doesn't address this. Trees are going to die whether we log or let nature take its course.
In your report to the public why are we not told what the future will bring to the unroaded areas? With many of these areas having as many as 1000 trees to the acre, they are not suitable wildlife habitat, and the trees are too close together for people to walk through. People should also be informed that this land is not growing marketable timber. The trees are subject to premature death from insects, disease, and catastrophic fire when there are too many stems per acre. When trees are killed by fire or pine beetles, all the trees in the area are the same age again, with too many stems per acre, growing less desirable trees and then this useless cycle starts all over again. (Individual, Omak, WA - #1065.10200)

ACCESS IS NEEDED TO REDUCE FIRE HAZARD

Given that inventoried roadless areas comprise more than twelve-percent of the 24 million acres of National Forest land in the Intermountain West that have been identified to be at high risk of catastrophic fire, I am concerned that the rule as proposed may unwisely limit the agency's management options. Certainly, there are times and places where the necessary management actions, such as thinning or prescribed burns, can be accomplished through means that do not require temporary road construction. However, if constructing a temporary road is the only viable means to restore healthy forest conditions, the agency should do so. Of course, such roads should be constructed so as to avoid or minimize to the maximum extent possible any adverse environmental impacts and should be immediately obliterated, re-contoured and re-vegetated upon cessation of needed management activities. (Individual, Northfield, MN - #12976.10211)

In September 1998 the General Accounting Office testified before the House Resources Committee on forest health that 31 million acres of Forest Service land east of the Cascade Range were in imminent danger of catastrophic fire, while adjacent private timberland did not pose such a threat. The reason given was lack of harvest and lack of roads on the federal lands. (Individual, Coos Bay, OR - #1710.10200)

The Forest Service mission, caring for the land and serving the people. Does this policy really do that? Can we really care for the land as stewards if we can't even access it, if we can't get to it? Forest Service maps show that millions of acres in Montana are at risk to catastrophic fire because they're infested with insects and disease. Many of these same lands are in roadless areas, and we're not going to be able to manage them. (Timber Association, Helena, MT - #11165.10210)

Many of the roadless areas are primed for catastrophic fires. One of the best tools to reduce those hazards is carefully designed timber harvest. By eliminating all possibility of roads, even temporary ones, this tool is effectively lost to managers. Helicopters logging sounds good, but isn't economically feasible in most situations. Modern logging equipment can reach the most remote areas with a minimum of impact on the land and few roads. A minimal road system provides access for management, facilitating actions to assure healthy forests, such as well managed prescribed fire. Under current forest conditions, following years of fire suppression, may of our

unmanaged wildlands are doomed to experience catastrophic fires, such as the Los Alamos fiasco. These fires can spread into surrounding managed forests, private property and communities. This rulemaking and DEIS fail to adequately address this important issue. Los Alamos was a wake-up call they had best heed. (Individual, Colorado Springs, CO - #59459.90000)

ACCOMMODATE ACTIVE MANAGEMENT OF FOREST HEALTH FOR LONG-TERM BENEFIT

The impracticality and conflicts created by wilderness and roadless designations in western South Dakota have already been demonstrated many times:
-Because of wilderness management restrictions, the Norbeck Wildlife Preserve has become so overgrown that it no longer provides good wildlife habitat.
-Because of wilderness management restrictions, materials to rebuild the Harney Peak fire lookout had to be hauled up on pack animals. Quaint, but hardly efficient. This could have been handled more efficiently--and with less physical impact--if 4-wheel drive trucks, a skycrane helicopter or power tools could have been employed.
-because of wilderness management restrictions, an infestation of thistles in the Badlands' Sage Creek Wilderness Area now is spreading to private neighbors.
-New federal criteria protecting dead snags from firewood cutters seems to go way beyond the real need to preserve some snags for wildlife habitat. (Business/Business Association, Rapid City, SD - #7865.10211)

As with anything, there needs to be a balance. We need set-asides, and we need ECO-SYSTEM based managed forests. If we can get main-stream commercial tree-farmers (G.P. and Weyerhauser) to manage in an eco-system based manner (such as Collins Pine), we would have a larger base of NATURAL forests, which would continue to evolve over time. And if we had a large base of naturally based forests, we would not need as much set-aside. In other words, sustainable harvesting and roadless areas work hand in hand for both maintaining a sufficient lumber supply and maintaining a natural state of healthy forests. (Individual, No Address - #43650.22200)

I don't believe that not putting in roads, banning motor vehicles and stopping the timber industry from all logging will save the forests in the long run. (Individual, No Address - #3957.10200)

Modern forest management needs to be flexible and dynamic. It needs to be able to adapt to change. I think the blowdown crisis on the Superior should demonstrate that to us all. When management is restricted, options are simply lost. When options are lost, the ability to meet objectives are lost. When that happens, the fate of management is lost to a law in a book with no ability to adapt or respond. At that point, we have all lost, no matter what our values and objectives might be. For this reason, I do not support any regulation which generically restricts forest management. (Individual, International Falls, MN - #22589.10211)

We are concerned by risks of unnatural fire and erosion threatening the National Forests, and we are disturbed by the gridlock in our community that prevents professional foresters, wildlife biologists, and other specialists from doing their jobs. In Idaho, 3.7 million acres of roadless forests are at risk to catastrophic wildfire. Signs of neglect are becoming evident in the forest as they become choked with too many of the wrong kind of trees, increasing the risk of dangerous wildfires. (Business, Coeur D'Alene, ID - #43175.10200)

This Proposed Rule would virtually eliminate the opportunity to carry out important forest and wildlife habitat management by prohibiting roaded access to over 179,000 acres of National Forest land in West Virginia. (Environmental/Preservation Organization, Beckley, WV - #43408.10210)

Public Concern: The Forest Service has failed to identify a compelling purpose and need to adequately justify the proposed action.

The statement that: "Road construction, reconstruction and timber harvest activities CAN DEGRADE the characteristics of IRA's" is true. "Can" being the operative word; these same activities CAN ENHANCE the characteristics of IRA's in many circumstances. A statement that certain activities CAN degrade certain characteristics does not represent a compelling need to limit these actions. (Wise Use Organization, Salt Lake City, UT - #16190.10200)

Failure to adequately consider forest health issues calls into question the purpose and need for the proposed action. How can the Forest Service seriously identify the purpose and need to protect roadless areas without considering the likely possibility that they will burn up? (Timber Association, Eugene, OR - #14879.55200)

I attended one of your informational meetings. During that presentation I was told that in the last five years we have lost 16 million acres of open lands to urban development. Number one on your list of lost land was "cropland." How much cropland is publicly owned? Cropland is owned by farmers. Remove cropland from your equation and your number one reason for this proposal is gone. (Individual, Sumpter, OR - #2735.10200)

On the Clearwater National Forest, over 250,000 acres are managed as Wilderness and almost an additional one million acres are classified as inventoried roadless areas. If all the inventoried roadless areas on the Clearwater were to be left roadless, this would mean that 70% of the Clearwater NF would remain roadless. Over the past 13 years, only 1.6% of the inventoried roadless areas have been developed. Currently, a moratorium is in place preventing any further road building in roadless areas. On the Clearwater NF, there is absolutely no threat to develop roadless areas and any attempt to pass any further restrictions is completely unnecessary. (Business/Business Association, Princeton, ID - #417.10220)

The benefits of road prohibition to the water quality of streams serving as municipal water sources are exaggerated. When compared to private lands, there is not enough difference in drinking water quality from a managed forested watershed versus a roadless forested watershed to justify the extreme approach of a NATIONAL roadless policy. A more balanced review of effects would lend greater credibility to the EIS. The section on Recreation, Scenic Quality, Wilderness, and Recreation Special Uses (pages 3-166 to 3-172) provides an example of a balanced, detailed analysis. (State Agency, Social Circle, GA - #13974.83140)

Page 3-15 cites the clean Water Action Plan (CWAP) as one of the reasons for initiating this roadless policy. The use of the CWAP as a guideline is inappropriate and in violation of the National Environmental Policy Act (NEPA). The CWAP represents a significant Federal action that requires an EA or full EIS under NEPA, and these have not been completed. Use of the CWAP as a guideline should be held up until a judgment has been rendered in the lawsuit filed against its implementation and its impacts have been analyzed under NEPA. (Individual, Carlsbad, NM - #53453.54100)

I would like the Forest Service to eliminate the current plan and devise another one. The new plan should include methods to evaluate the significance of roads for recreational uses, fire protection, fuel removal, emergency access, and well-founded forest management. (Individual, Houston, TX - #17435.60000)

Public Concern: The Forest Service should abandon the rulemaking because existing laws and regulations already provide adequate protection for roadless areas.

We all know that there are enough laws on record currently to protect the area from devastation. We need the flexibility to use the resources available if needed. (Individual, Whitehall, MT - #2333.10220)

I was told that the purpose of this Proposal is "no new roads." The government already has plenty of rules and regulations that would prevent road building on public land. So we don't need this proposal unless, of course, we are not being told the whole truth. (Individual, Sumpter, OR - #2735.10200)

We believe additional rulemaking would be redundant and unnecessarily burdensome because there are existing laws and regulations to address the environmental protection of roadless areas in the National Forest System. All actions on national forest property are subject to the provisions of the National Environmental Policy Act, the Clean Water Act, the Endangered Species Act, and Section 106 of the National Historic Preservation Act, and the implementing regulations of each of these laws. Strict adherence to these existing laws and regulations would ensure continued environmental protection within the boundaries of national forests. (State Agency, Richmond, VA - #87.54000)

Close to ½ of all the roads in the Umatilla Forest have been closed already under the existing forest plan. The Forest Service has the power already to require that any logging that takes place be done by air--resulting in no new roads. If the stated objective of this "rule" is truly no new roads, then we already have laws and rules in place to take care of this. (Individual, Sumpter, OR - #2749.10220)

This proposal is redundant, the current Forest Plan already addresses these issues and this will just add another layer of bureaucracy. It would supercede the current plan, which establishes criteria and procedures to ensure social and ecological values of inventoried and uninventoried roadless lands are considered and protected. (Individual, Orofino, ID - #3589.10220)

The management areas already in use provide planners with adequate tools to protect roadless areas without any of the proposed rule's restrictions. The net effect of the proposed rule will be a reduction of land available for timber harvest when in fact this may not be in the best interest of balanced use. The land under consideration has already been evaluated for and released from Wilderness designation. (Individual, Weston, WA - #1340.10200)

What will be gained by the Roadless Area Conservation that is not already being accomplished by the current environmental statutes? The preservation of clean drinking water sources is being accomplished with the Clean Water Act. Providing habitat for rare plants and animals in already being done through the Endangered Species Act. The preservation of landscapes can be achieved through proper land use management plans. Why does the government feel the need to impose further restrictions on public lands? Why can't the current environmental statutes already in place be used to accomplish these goals? (Individual, Challis, ID - #7265.10220)

Public Concern: The Forest Service should prioritize more pressing issues than the protection of roadless areas.

We as snowmobilers believe that there are other issues that the Forest Service needs to address instead of attempting to lock up the roads of the forest. Fire management, diversified recreation management, stream and river management and cave management to name a few. (Recreational Organization, La Pine, OR - #6739.10200)

1.1.2.1 Access Considerations

Public Concern: The Forest Service should not restrict public access.

Until we have more level headed and realistic leadership from our federal government, the status quo is bad enough. We need no more restrictions on forest access until such time as a fair and equitable discussion of the issues that involves everyone, not just the environmental left, can occur. (Individual, No Address - #474.10200)

We believe that the American people are entitled to reasonable access to their national forests, regardless of the management prescription assigned to the land within the forest boundary. After all, even Designated Wilderness, the most restrictive of prescriptions, includes the direction that Wilderness Areas shall be managed for the use and enjoyment of the American people. We also believe it is the responsibility of your agency to provide that reasonable access, and to discourage exclusive use of our national forests. (Wise Use Organization, Billings, MT - #3830.10210)

I object to the proposed Forest Service Roadless Area Conservation plan that allows the Forest Service to continue to build new roads and use existing roads for logging yet denies the public access to the roads. (Individual, Noxon, MT - #3406.10210)

This decree would affect the public access to areas that have been accessible by existing roads for over a century. (Individual, Las Vegas, NV - #926.10210)

This new proposal will not only lock [up] unroaded wilderness but there will be adjacent land that will not be accessible even though it is not classified as roadless wilderness. (Individual, Spearfish, SD - #1609.10210)

Maybe what you do not realize is that the road system is exactly what has allowed the people to have access to the forests they love and use. Locking up more areas with no new roads will deprive future generations of the opportunity to enjoy and use the forests. (Individual, Grants Pass, OR - #1714.10212)

FOR RECREATION

I do not support any plan that reduces even by one foot the number of miles of recreational trails open to mechanized travel (including motorcycles and bicycles) in our national forests. In fact, I strongly suggest that you increase the number of miles available to mechanized travel. (Individual, Boise, ID - #29245.10200)

I am writing to you for your support in blocking Clinton's Roadless Highway bill. This bill is unlawful to the citizens of these United States and would deny families the privilege of utilizing our national lands for off-highway vehicles. As we all know our lands must be kept pristine in order to preserve them so generations following us may also enjoy their use. People now using this land are fully aware of the consequences and strive to take the utmost care when using these parks and forests. I urge you to think it through and do the right thing. Please do not back this travesty. The citizens of the United States deserve to be able to carefully utilize their land and parks. (Individual, No Address - #340.10200)

FOR THE ELDERLY, DISABLED, AND ALL BUT THE WEALTHY

This will severely restrict access for the elderly and handicapped. (Individual, Casper, WY - #43176.10200)

I am against the Roadless Area Conservation Proposal. It is unfair to many because of age or disability, they won't have access to these areas. (Individual, Tucson, AZ - #13835.10213)

If there are no roads or off road motorized accessible trails anywhere in the forests, and existing logging roads are closed to motorized travel, I, and a great majority of older U.S. citizens will never be able to enjoy those lands, as has been our traditional right, lands that we are joint owners of. (Individual, Blaine, WA - #28090.10210)

Page S-38 states that people with disabilities could use guides and outfitters to access these areas if alternative 2, 3, or 4 was chosen. This discriminates against low income people with disabilities who cannot afford to hire guides and outfitters. These alternatives also discriminate against native American elders who are traditional healers. They will not be able to collect traditional culture non-timber forest products because of the difficulty of walking long distances. (Timber Company, St. Maries, ID - #28102.10213)

Instances of exploitation should be curbed by law but creating more wilderness areas effectively denies access to some of our most scenic land to most of us (which is the obvious Clinton administration agenda). This is self-evident if one considers the implications of venturing into wild and primitive country. Only the wealthy can afford the gear, professional guides/outfitters, horses and even time required for forays into wilderness. Otherwise one must be young, healthy and unencumbered by family to make backpacking an option. Either way the vast majority of us are denied access to anything but the perimeter of wilderness areas. (Individual, No Address - #2232.10210)

I live in Wyoming where you would think that I have unlimited access to our public lands. However with each year that passes, I find fewer and fewer access routes to the Forest. The reason is private landowners are shutting down access across their lands and the Forest Service continues to shut down existing roads. The Forest Service should be buying access routes and building new roads on the Forest to replace the private access routes that are being closed. Instead, you are proposing that no new roads will be constructed. At the rate this trend toward no access is progressing, it will only be a matter of one generation and the rich will have the Forest as a playground because their lands adjoin the Forest and the rest of us will be restricted to a few existing corridors. (Individual, Cody, WY - #43831.10200)

The forests are not a park or playground for the elite. Access and use should be broadly permitted, with a modest number of exceptions. Please get back to SERVING the ordinary people, such as ranchers, lumber workers, sportsmen--not the elite and big money easterners. (Individual, Broomfield, CO - #1611.10200)

FOR TAXPAYING CITIZENS

I am very angry with Clinton's legacy locking up all our roadless areas and national forests. All citizens have the right to log, use vehicles on the land, hunt and fish, and homestead on the land, and gather edibles, and go out target shooting and whatever. (Individual, Missoula, MT - #43391.10200)

This Roadless Area Proposal is invading our rights as citizens of the USA, this is public land which means it should be for all citizens to use and for the benefit of all people, not the select few who think it is not to be used at all. (Individual, No Address - #25640.10210)

US Forest & Federal lands should be kept open to the public as they are paid for by the people through taxes. (Individual, Kiel, WI - #19365.10200)

As an AMERICAN TAXPAYER, I am furious about the Roadless Area Conservation Proposed Rule. How dare you try to make roadless areas when the American Public pays for public lands with tax dollars. We the public, have paid your salaries while you dream up ways to keep us off our public lands. (Individual, No Address - #28122.10210)

Public Concern: The proposed rule will deny the American people legitimate access to their public lands.

The Roadless Initiative combined with the Transportation Plan and the revised Forest Planning Rules is just a part of a bigger plan to deny the American people legitimate access to the lands they own. (Individual, Las Vegas, NV - #8925.72200)

The U.S. Constitution severely restricts the government ownership of land. That being the case, the federal government has no authority to deny the use of public lands to the people of this nation. (Individual, Wolcottville, IN - #13768.10200)

As OHV enthusiasts I consider my wife and myself to be the true environmentalists in this struggle to keep our public lands open. We crave the beauty of the lands God and our forefathers have provided us. We demand the right to enjoy them without Big Brother and the environmental elitists controlling our access to & the enjoyment of what we have rightfully earned under the Constitution of the United States. You must stop the enactment of unjust rules and restrictions through executive orders and the whims of those that would restrict access to themselves and their ilk. This circumvents due process which our founding fathers have fought and died for. We will not be deterred. (Individual, Corpus Christi, TX - #8254.10210)

My friends, neighbors, and myself are vigorously opposed to this further incursion into the rights and welfare of the American citizenry. It is a scheme to exclude rightful entry into federally owned (our) forests and multiple use of an immense and now virtually unmanaged resource. (Individual, Chehalis, WA - #25907.10200)

Stop closing the roads. As a taxpaying citizen of the United States of America I deserve access to my country. If you want to deny access of the wilderness and federal parks land to anyone deny it to foreigners. Not the citizenry of this country. Do not let foreign interests buy it up. Do not let developers buy it up. The federal government was only ever meant to be the custodians of our public lands not the dictators thereof. (Individual, No Address - #7660.41500)

1.2 The Mission and Guiding Policy of the Forest Service

This section addresses a number of general concerns respondents raise regarding the mission and guiding policy of the Forest Service. Some discuss public land management in general while others address roadless areas in particular. Concerns are organized in the following subsections: 1.2.1 Clarification of the Forest Service's Mission; 1.2.2 National Forest System Lands Management and Environmental Protection; and 1.2.3 Multiple Use Management.

1.2.1 Clarification of the Forest Service Mission

Some writers believe that the Forest Service needs to clarify its mission as it enters the 21st century: whether the agency's purpose is to maintain a timber supply to serve the needs of private business, or to preserve a broad array of ecosystem values. "In my opinion, today, the USFS is an agency that is largely floundering to find its way back to a meaningful mission. . . . The USFS has gotten itself into the hot seat it is stuck with today because past leaders of the agency failed to have any vision for the future. I believe the Roadless Area Rulemaking process, if it results in long-term conservation of roadless areas, will ultimately bring the agency back to the stewardship role it once played in this country," concludes one individual. With respect to the rulemaking, other writers request that the Forest Service more clearly articulate the overarching goal of the proposed action. Without clear understanding of the long-term objective of this proposal, these writers maintain, they are not in a position to support it. Many provide their own suggestions as to the appropriate goal of the rulemaking, with some proponents advocating that the agency take action to increase the effective size of wilderness, wildlife corridors and core habitat conservation areas. Others consider that the central role of the Forest Service should be to provide dispersed and primitive non-motorized recreation; to this end, greater protection of roadless areas is necessary.

Public Concern: The Forest Service should clarify its mission as a public land steward for the next century.

I want to applaud you on your vision for the Forest Service in the 21st century. I'm writing this letter in support of President Clinton's initiative to protect wild forests and I'm sure it is a tall order in light of the past mission of the Forest Service for the last 100 years. (Individual, McMinnville, OR - #1847.10100)

The Forest Service has long been confused about its mission. Is its purpose to upkeep a large farm of trees for America's business interests, or to preserve wild land and its many benefits (water, wildlife, etc.) for future generations? (Individual, Portland, OR - #3691.20000)

Forty years of USFS "multiple-use" management (which never was much more than federally subsidized logging, mining and grazing) has pretty much gotten the Forest Service to where it is today. In my opinion, today, the USFS is an agency that is largely floundering to find its way back to a meaningful mission. The days of punching new roads into pristine country is over and everybody knows that. The buffalo won't be coming back and neither will the days of aggressive timber harvests and new roads. Unfortunately, over the last forty years some communities have come to expect unrealistic levels of timber harvest from our USFS lands, which simply can't be reasonably sustained at the past level. The USFS has gotten itself into the hot seat it is stuck with today because past leaders of the agency failed to have any vision for the future. I believe the Roadless Area Rulemaking process, if it results in long-term conservation of roadless areas, will ultimately bring the agency back to the stewardship role it once played in this country. Commercial logging and grazing will always have a place in National Forests, I hope.

However, roadless areas have become a more valuable commodity, IN AND OF THEMSELVES, than they will ever be able to give this country in board feet, AUMs, or minerals. The value of these areas as wildlife habitat and as places where people can go to escape our ever-growing society will continue to increase. Over the last 15 years or so Americans on both sides of this issue may have temporarily lost their respect for the USFS, but they still love the National Forests. (Individual, Helena, MT - #1229.10110)

Public Concern: The Forest Service should clearly state the overarching goal of the proposed rule.

I think the following question is critical and needs to be answered, yet the subject is never even mentioned in the DEIS. What is the goal? I mean the ultimate, overarching goal? Claims are made in the DEIS that resources need to be protected. The authors make it clear that this means from people because human activities are what is depicted as bad. Well, we now have 104 million acres "preserved" as Wilderness Areas, which apparently is not enough. The proposed action will add another 54 million acres of wilderness-like restrictions. Even that is not enough because the proposed action will also add undisclosed "unroaded areas" with wilderness-like restrictions. So how much is enough? The entire North American continent? That's not going to happen. As the DEIS states, the areas targeted by the proposed action are disproportionately in the west and represent relatively few types of ecosystems. So what is the long-term large objective this action supports? I want to know before I will support it. (Individual, Fort Collins, CO - #19429.33100)

We request that the Forest Service revise and reissue a draft Strategic Plan that is comprehensive in scope, prior to closing the public comment period of any proposed rulemakings or policies. The revision plan should include a comprehensive mission statement, general and outcome-related goals and objectives, and various descriptions and evaluations designed to clarify the long-term goals for implementing the agency's mission, including the resources needed to reach these goals. This revised plan will allow forestry professionals and the public to understand how these various proposals might effect the agency's goals and objectives, the sequence in which they will be adopted, how they relate to each other, and how much they will cost. (Professional Society, Portland, OR - #29752.70000)

Public Concern: The goal of the proposed rule should be to increase the effective size of wilderness and core habitat conservation areas.

Increasing the "effective size" of wilderness and "core" habitat conservation areas should be a major goal of the rulemaking process. It is no coincidence that IRA's are found near/adjacent to currently protected areas. Areas need to be considered as to how they complement each other and what ecotypes they encompass, not just how much acreage they contain. (Individual, Leavenworth, WA - #15897.71120)

If biodiversity and ecological integrity are characteristics of roadless areas that are to be sustained for the long term, then the core habitat found within roadless areas, free of exotic invasion, roads and mechanized disturbance, must be permanently and effectively protected. In summary, we have learned from the scientific studies of Island Biogeography and Conservation Biology the importance of maximizing the size and integrity of roadless areas, which serve as core habitat for native species and as bulwarks against the spread of exotic species. Further study of terrestrial ecosystems has revealed that protecting and restoring connectivity between roadless areas is the key to sustaining biodiversity and ecological integrity for the long term. (Environmental/Preservation Organization, Albuquerque, NM - #43737.80000)

As you are well aware, the roadless areas of our forests are a small percentage of the total National Forest areas, and the National Forests themselves are a small percentage of the land area of the U.S. Thus, even combined with the National Parks, only a very small proportion of our once extensive wilderness area is relatively free from human impact. These small, often disconnected areas are all that is left to provide wildlife habitat, natural, undisturbed scientific study areas, critical ecosystem functions, and a living legacy of our nation's natural heritage. (Individual, Ashland, OR - #8279.83000)

Public Concern: The Forest Service should recognize that its central role is to provide dispersed and primitive backcountry recreation.

The Forest Service must recognize the obvious, that the central role of the Forest Service is to provide dispersed and primitive recreation to the American People. (Individual, Walhalla, WA - #10891.41200)

I am writing in favor of the Roadless Area Conservation Proposed Rule that would protect important undeveloped areas in the National Forests. We have used these areas for recreation (hiking, cross-country skiing, etc.) and especially value their undeveloped state. Nowhere else can you appreciate the beauty and serenity of the wilderness. (Individual, No Address - #1591.10100)

1.2.2 National Forest System Lands Management and Environmental Protection

Many respondents favoring the proposed rule contend that today's forest management should emphasize environmental protection. Some suggest that national forests be managed like national parks, thereby protecting old growth and encouraging dispersed low-impact forms of recreation. One person suggests the Forest Service follow the example of Isle Royale in preserving national parks as "islands of wilderness" which are open mainly to walking. This respondent represents the confusion a number of persons have over the various jurisdictions of public lands; but the person's point nevertheless is that some areas deserve stronger protection than they are presently receiving. Many opponents of the proposed rule contest this, and note that Congress established quite distinct public land management agencies in order to meet different goals. The differing management regimes of each agency should be maintained rather than blurred, many assert. Some continue to state that commodities extraction and watershed protection are the two uses of national forests specified in the enabling legislation of the agency, and should still take precedence. A few recreationists object to the increasingly controlled and sanitized visitor experience found in many National Parks, and urge the Forest Service to continue providing the public as unregulated a backcountry experience as possible.

Proponents of a roadless area conservation rule feel that the agency in the past has not adequately considered ecological science and research in its management decisions. Scientifically sound decision-making, they say, is necessary to maintain the complexities and interrelationships within forest systems. To this end, respondents often emphasize the need to protect whole ecosystems. As one writer puts it, "Economic and so-called recreational considerations must…bow to the health and sustainability of forest ecosystems at large." Another writes, "The health of our forests, animals and watersheds must be a priority for the Forest Service." Some comment that the Forest Service should continue with its current Natural Resource Agenda. Finally, many respondents believe the proposed rule should be based on what's good for both the environment and the economy, and this, they believe, is greater protection of roadless areas. Some also remark that the Forest Service should promote wise management on forests internationally. Finally, some suggest that future forest management should focus on habitat restoration activities. "We need to establish a policy that allows us to fix our past problems instead of just creating new ones," asserts one respondent, a concern echoed by many proponents of roadless area conservation.

Public Concern: The Forest Service should consider whether National Forest System lands should be managed like national parks.

MANAGE SIMILAR TO NATIONAL PARKS

I think the management of our national forests should approach that management that we see with respect to the national parks. That is, these wilderness areas are sanctuaries, and violations of such should be minimal. We do certainly want to enjoy them in forms of acceptable recreation. We can define such recreation in terms of walking, camping, hiking, sightseeing, photography, peace and quiet, escape-from-the-city, solitude, study, reflection, aesthetic enjoyment, and even in the knowing that the deep forests still exist somewhere. There is a definite distinction in the classifications outlined above. Many people don't see this distinction and the debate just gets confused and the issue historically had difficulty in getting sorted out. I've seen people in Michigan look around and say there are plenty of woods around and what is the problem? But, of course, it is not this woods or plantation classification that we seek to protect. It is the unequivocally old-growth forest and other pristine wilderness areas that are now scarce. Many of these areas are already in national parks. In the national forests there exist such old-growth areas, too. However, most have already been cut and destroyed since the Forest Service has pursued a road-building and extraction policy, unlike the National Park Service. We seek to prevent this destruction on those remaining pockets of forest within the national forest lands. All I ask is that the Forest Service throw out the term "timber" as it no longer applies to the lands over which the Forest Service controls. This term should be relegated to the plantations. (Individual, Belding, MI - #2886.22000)

With national parks, I think decisions can and should be made clearly in favor of preservation and conservation. Let people adapt to what the park itself needs, so that the park is preserved. Isle Royale is maybe a good model of what a national park should be like, and we need to take steps in the other parks to make them similar islands of wilderness, open mainly to walking. (Individual, Allentown, PA - #2976.23000)

DO NOT MANAGE SIMILAR TO NATIONAL PARKS

Finally I feel that our national forests are & have been well managed. They should continue to be managed for the basic purposes outlined by Congress in the Forest Service's enabling legislation: timber and watershed protection. We have national parks for preservation. (Individual, Norris, TN - #11633.22000)

This Administration's desire to preserve a majority of the National Forest System for primitive recreation and for the elements of biological diversity found in older growth forests (SEE 65 Fed. Reg. 30276) blurs the distinction between the National Forest System (which is to be managed for multiple uses, including timber) and conservation-orientations like the National Park System and the National Wildlife Refuge System. Even if the Forest Service had the legal authority to change the orientation of the National Forest System (which it does not), the blurring of roles makes it more likely that the Forest Service will lose its land base and have the conservation-oriented areas transferred to the National Park Service or U.S. Fish and Wildlife Service. (Timber Association, Eugene, OR - #15879.21200)

With the rapid growth in designated Wilderness proposals, the President's rash of unilateral National Monument designations and the "aggressive decommissioning" of roads that this alternative advocates, the principle visitors to NFS lands will be concentrated into very small, highly sanitized areas with little opportunity for any true backcountry experiences. This is the path the National Park Service appears to be following at many of their public land areas and is often employed by commercial parks where all the visitors are herded into small enclave and toured through select areas by tram. We believe that, while that approach may have its place, our NFS managed lands deserve to be fully experienced and enjoyed by responsible recreationists. (Individual, Beaumont, TX - 50613.21400)

Public Concern: The Forest Service should rely on sound science in its management of National Forest System lands.

There is such a great need for scientific study of our grand forests in order to have a better understanding of its complexities and interrelationships--so that we (Forest Service) can make adequate decisions in its use. Certainly, any policies to be incorporated today, should be solely based on our current scientific knowledge. (Individual, McMinnville, OR - #1847.22000)

Please adopt a policy that relies on scientific study, not politics, to set policy. (Individual, No Address - #2215.23000)

The negative impacts and irreversible commitment of resources through errant practices of the past are forcing us to adopt new management techniques based on the best science available. Roadless conservation will provide the control element required for developing future scientific management methods. (Individual, Klamath Falls, OR - #17583.10100)

I support the proposed initiative and believe that it is based on sound science and will also greatly benefit the U.S. public as well as our nation's water quality and national forests. (Individual, Houghton, MI - #993.10100)

Public Concern: The Forest Service should give environmental and recreational uses of National Forest System lands the same consideration as commodities uses.

We realize this is a giant step for the Forest Service, but it is time to start placing environmental and recreational uses of our forest on the same playing field with timbering. (Individual, Dunwoody, GA - #1322.20000)

All too often, the Forest Service, and other government agencies, are far too condescending with the large timber, ranching, and mining corporations at the expense of the American public, and lesser animal life that is forced out of their habitat as the timber companies clear-cut our old growth forests and hasten the loss of topsoil by the action of erosion. Mining companies extracting petroleum, natural gas, and hard rock ores, leave large ruts, tailings, and toxic poisons at their backsides as they move on. Congressional policies that frequently legislate for low, low rentals of lands managed by the U.S.D.A., all to the favor of stockholders owning shares in large cattle ranches, gas, timber, and mining companies, is an impediment to the legacy the present generation must pass on to their children and grandchildren, if future generations are to enjoy pristine forests and the grandeur of our park system. (Individual, Bellingham, WA - #6900.41720)

There is an overriding emphasis on timber harvest at the expense of recreational uses. I am in support of sustainable timber harvests in the national forests but I am also appalled at the over-harvest mentality that does little to protect the species that rely upon the forest ecosystem. (Individual, Kenyon, MN - #1057.21600)

The economic interests of a small number of loggers and others who seek to exploit the National Forests for personal gain is greatly offset by the…number of people who wish to use the National Forests for recreational pursuits. (Individual, Atlanta, GA - #19476.21600)

As we move into the next millennium we are at a turning point with how we manage our public resources. I believe that the indefinitely sustainable practice of tourism is a much wiser usage of land than the logging or mining of our national forests. (Individual, No Address - #2794.71220)

Public Concern: The Forest Service should prioritize protection of forest ecosystems.

The time is past wherein we have the luxury to view our national forests as a resource to be exploited. To the contrary, we have an obligation to the present and future generations to preserve them for all time. In the broader context of impending global warming, economic and so-called recreational considerations must necessarily bow to the health and sustainability of forest ecosystems at large. (Individual, Chico, CA - #658.22000)
One of the things that we need to do in natural resource management is return to common sense. Let ecological imperatives mandate action, not economic gain. Think about whole ecosystems and the effects of human activities on them. In the Sierra Nevada Ecosystem Project science finding I believe that it was reported that logging was the most disruptive thing that could be done to a forest stand, and the highest indicator of where places will burn out of control. (Individual, Pittsford, NY - #3334.22000)

The majority of Forest Service lands that are not already managed as roadless areas are grossly over-roaded. Forest Service land management should shift away from road-oriented recreation and industry, toward non-motorized recreation and habitat improvements, especially for sensitive and endangered species management. (Individual, Hagerman, ID - #2110.23000)

Please continue with your natural resource agenda! (Individual, Red Lodge, MT - #4919.24000)

Public Concern: The Forest Service should promote sustainable forest management internationally.

Please let me know if you have any ideas on how the Forest Service can play a role in wise use of resources internationally. Can the FS somehow use its international forestry program to help stop the mining of Siberian timber by private companies, timber which eventually ends up in American products? (Individual, La Grande, OR - #13327.41200)

Public Concern: The Forest Service should re-focus forest management on habitat restoration activities and ecosystem health goals.

Forest management actions in roadless areas should be combined with habitat restoration actions. Previously roaded areas that have high potential for timber production and low erosion potential, should be considered for a sustainable wood product industry. Large scale industrial forestry should be confined to areas with low fish and wildlife potential and efficient timber plantations in the Southern U.S. (Individual, Kalispell, MT - #1580.21000)

This proposal is one that speaks to the future instead of the past, and it is completely consistent with the Forest Service's mission which is, in fact, to be a steward of our public lands. The future, which is being led, and I think appropriately enough, by the Helena National Forest, in one arena in particular, to move from the destructive pattern of road building and everything that goes with it to reclamation and restoration of past mistakes is, in fact, the future and not the past. It is the way the Forest Service should be going, and I applaud you all from the very top to the very bottom for taking this initiative. (Individual, Helena, MT - #11168.10100)

As with other uses on our public lands, the Forest Service must ensure that ALL IMPACTS of road building, road maintenance and even road obliteration are addressed. The health of our forests, animals and watersheds must be a priority for the Forest Service. The Forest Service must have a very clear policy, which outlines when any new road construction or road improvements may be made on public lands. In this policy the health of the ecosystem must take priority. Our past history of over-extraction of resources, extinction of plant and animal species and degradation of our watersheds should be our guide to set strong policies in place to ensure that we do not allow this to continue to occur. All current proposed actions must be put on hold until a new policy ensuring the health of the ecosystem is put into place. We need to establish a policy that allows us to fix our past problems instead of just creating new ones. (Environmental/Preservation Organization, Seattle, WA - #958.22000)

I am concerned that we design for human convenience rather than to assure long-term ecological quality. Currently we follow a traditional paradigm that stipulates we will manage the landscape to achieve a broad spectrum of human values/uses. I encourage you to cast a preferred alternative that shifts that paradigm so we are managing human occupancies of the land to encourage landscape recovery and health and preserve pristine American wilderness areas. (Individual, Phoenix, AZ - #1109.22300)

1.2.3 Multiple Use Management

Many respondents support a general policy of multiple use management for the national forests. However, there are widely divergent opinions as to the proper types and balance of uses on national forests in general and roadless areas in particular. Opponents of the rulemaking often express the view that it is a repudiation of multiple use management; comments to this effect are addressed in Section 1.2.3.1. Some writers cite the Forest Service motto, "Land of Many Uses," and claim that by elevating preservation above other considerations, the proposed rule violates that mission. Many writers use phrase "multiple use" to mean that commodity extraction and motorized use are permitted without restriction. Supporters of this view rarely consider non-commodity values or ecosystem preservation as a part of the multiple use spectrum. Therefore these individuals frequently express the opinion that land management designations that emphasize these values are contrary to multiple use. Many respondents argue that non-use amounts to non-management, leading to declining forest health. They believe that traditional multiple use represents a balanced approach to forest management. Writers point out, further, that national forests belong to the people, not the agency, and should continue to be managed to meet the needs of all users.

In addition to these general remarks regarding the need for multiple use management, writers make a number of more specific points. Some writers claim that the Forest Service has lost its vision, that it is no longer a world leader in resource management. This, they allege, is due to increasingly top-down management and political pressure that has supplanted science-based timber harvest and resource extraction. One individual believes the Forest Service should support the tenets of the Wise Use movement. In a similar vein, another respondent asks the Forest Service to clearly differentiate between "conservation" and "preservation" of roadless areas in the Draft EIS. "The proposal, alternatives, and discussion," this writer points out, "all lead to the concept of 'preservation' and not 'conservation.' Conservation is more appropriately defined as the 'wise use' of resources, not withdrawing them from use." The proposed rule, many of these writers feel, would reduce the percentage of land available for multiple use. One writer points out that despite the claim that this won't affect multiple use management, a ban on new road construction will mean that local forest managers will decline to open areas to commodity extraction for fear of litigation.

Opponents of the proposed rule often argue that active management is actually better for the environment than allowing natural processes to predominate. One writer claims that in multiple use management may actually foster the development of wilderness quality lands, since environmental organizations identify more and more acres each year which qualify for wilderness designation. Many writers point out that the Forest Service should consider the future raw materials needs of the population for forest resources, and fear that the proposed rule would

decrease the agency's ability to meet these demands. Many respondents stress that multiple use management as applied to roadless areas should include commodity extraction. Indeed some of these writers believe forests should be managed like farms with timber being viewed simply as an agricultural product. A few writers suggest that the Forest Service should look to Europe for forest management guidelines, noting specific examples that appear to protect the environment while meeting the needs of users. Finally, many opponents of the proposed rule argue that multiple use management should include motorized recreation.

Proponents of a roadless area conservation rule argue that traditional multiple use management has not sufficiently protected National Forest System lands. These viewpoints are addressed in Section 1.2.3.2. They believe that the Forest Service should not manage roadless areas for traditional multiple use that emphasizes commodity extraction. A large number of proponents point out, moreover, that on many public lands recreational values already outweigh commodity values and that this trend will continue. Therefore, they conclude that the Forest Service would do well to encourage tourism and recreation over traditional resource extraction.

A number of those favoring the proposed rule do not believe that multiple use management should be ended per se, but rather that the concept itself should be restricted or redefined. Many feel that the Forest Service has been too narrowly focused on timber harvest in the past and that the agency must now better balance non-commodity uses and ecosystem benefits as legitimate multiple uses. Writers claim that multiple use management should take into account the overall vitality of the ecosystem; they argue as well that the concept of use should be disconnected from that of consumption or harvest. They argue that multiple use management does indeed include protection of roadless areas, noting that the mix of uses in roadless areas is just different than it is in areas open to other activities. One writer notes that multiple use management does not mean every use should be available on every acre. If all lands were roaded, logged, or mined, another points out, then that would not be multiple use. While many opponents of the proposed rule fear that needed commodities will be locked up, a few writers take the opposing view that natural resources in roadless areas should be set aside now in order for them to be available in the event of future national need or emergency.

Some writers argue that multiple use management of roadless areas should not include commodity extraction activities, because the non-commodity value of these lands for recreation and intact wildlands are most important to today's society. Many others feel that multiple use management of roadless areas should emphasize wildlife and habitat values. As one respondent notes, all too often the interests of wildlife are not valued as much as development activities, yet they're "an important natural resource to our future and to the long-term health of our forested ecosystems." Many proponents of roadless area conservation feel strongly that multiple use management of these areas should not include motorized recreation. Indeed, argue some, a strong national policy is needed which will place ecological values above the interests of motorized recreation in roadless areas.

1.2.3.1 Commodity Values and Multiple Use Management

Public Concern: The Forest Service should manage all National Forest System lands for traditional multiple uses.

Please uphold the United States Forest Service motto, “Land of Many Uses.” (Individual, Breckenridge, CO - #17431.21000)

The proposed rule elevates preservation over all considerations of multiple use, in violation of USFS’ mission. (Individual, Albuquerque, NM - #16182.21000)

We need management to FACILITATE MULTIPLE USES OF OUR PUBLIC LANDS so as to maximize its value to everyone. Public land is just that, “PUBLIC,” it’s your land, it’s my land, and it’s every citizen’s of this nation land. Each one of us should have access to use our land with the least restrictions possible. These public lands do not belong to the Forest Service, B.L.M. or any government entity, they belong to us the public. The land is only managed for us by these government organizations. It should be managed to accommodate all of us not just one or two of the special interest groups. That means we need more roads, trails, and other means of access wherever it’s possible, not less. At the very least the accesses (roads trails etc.) we now have should remain open. (Individual, West Point, UT - #4008.21200)

Public lands should be for multiple use. The lands and the forests should be used for the enjoyment of the public, as well as serve as an economic base for supporting communities close by. (Individual, Klamath Falls, OR - #2909.21300)

As a stock user on the forest lands, I am committed to having these public lands open for recreational use for stock users (horse and mule) for future generations. I do not want to see recreational use eliminated or restricted in these inventoried roadless areas. I support a movement called “The Wise Use Movement.” This movement believes in the use of public lands in a responsible and “leave no trace” manner. Public lands can be used wisely while being protected and managed for future generations. (Individual, Arlington, WA - #10798.92300)

We should all be able to use the forest as it was intended to be used. THE LAND OF MANY USES. It should be just that, because my uses may be different than yours, doesn’t make yours or mine wrong. Plus this is not a good economical decision, instead we should work together. Loggers, miners, sportsmen, and environmentalists. We all have our place in our National Forest. (Individual, No Address - #10367.21000)

Conserving our forests is of utmost importance, but control of mining, lumber cutting, and grazing can be done on a conservation program which still allows citizens to enjoy the beauty and recreation of the national forests, without jeopardizing the industries aforementioned. (Individual, No Address - #43187.21000)

Public Concern: The Forest Service should return to decentralized management with an emphasis on scientifically-based resource extraction.

The USFS used to be a world leader in resource management but now, at best it is middle of the pack, worldwide. This isn’t because of ecosystem management or lack of good USFS people. It is because leadership has lost its vision of what a well-managed forest is and it is because the agency is now driven by large scale, top-down, political corruption that has driven out both good art and science in its practices—and this roadless area DEIS and its underpinnings are a good example of that corruption. (Individual, No Address - #13243.44300)

Since retiring in 1980 I witness in my judgment the deterioration of national forest management based upon sound scientific established principles. Multiple use plans have been supplanted with often emotionally inspired wishes and demands leading us down a path that precludes use and protection of the forests in the long run. This latest non-use proposal to close and/or preclude roads in the national forests is another BIG mistake--not management! (Individual, No Address - #541.21000)

Public Concern: The Forest Service should distinguish between "conservation" and "preservation" of roadless areas in the Draft EIS.

The document repeatedly references the "Conservation" of roadless areas. In reality, the discussions in all chapters refer to protection and preservation of roadless areas. The proposal, alternatives, and discussion all lead to the concept of "preservation" and not "conservation." Conservation is more appropriately defined as the "wise use" of resources-- not withdrawing them from use. The Summary, Page S-2, defines the importance of roadless areas for watershed and ecosystem health only. The resources in roadless areas must be identified as being important to community health in regard to stability, dependency, jobs, income, payments to states, etc. The proposed action leaves little discretion for management of resources in roadless areas. (County Elected Official, Sheridan, WY - #16187.31300)

Public Concern: The Forest Service should not significantly reduce the percentage of National Forest System lands available for multiple use.

With the Forest Service managing 192 million acres and 42 million, or 22%, of those acres in wilderness designation, the addition of 52 million acres more, or 28%, that are now being considered as roadless…will bring the acreage to 50% that will not be managed as multiple use. (Wise Use or Land Rights Organization, Bend, OR - #6727.21000)

Under this plan, public lands designated as multiple use areas would be reduced significantly. In Alaska for example, multiple use area would be reduced from 62% to 7%. Montana's reduction would be from 79% to 45%. Many other states' multiple use area would be affected in similar sweeping fashion. (Individual, Thornton, CO - #11264.21000)

I disagree with the statement that this initiative will provide additional protection for the inventoried areas and other smaller unroaded areas through forest planning. On the contrary, this proposal will remove more acres of Federal land from multiple use management practices. (Individual, Clarendon, PA - #8374.10200)

We have been told it will not affect multiple use. But with no roads being allowed developed or improved upon, new forest plans are going to opt out of opening areas to logging. Any such attempt to open areas would undoubtedly bring lawsuits by groups who oppose any logging on "public" land and one of the reasons you give for pursuing this roadless initiative is to avoid lawsuits. (Individual, Mimbres, NM - #8734.43000)

The legislature…points out that the White Mountain National Forest was established by the Weeks Act almost a century ago to ensure watershed protection, a sustainable and continuous supply of timber and recreational opportunities. In short, an application of the principles of resource protection and multiple uses. This balanced approach is not achieved by permanently removing up to 40,000 acres of productive forest. (Business/Business Association, Glen Falls, NY - #2755.21000)

Public Concern: The Forest Service should consider that active multiple use management including commodity extraction is better for the environment.

I have spent considerable time in the national forests, as well as on land owned by Weyerhauser and other forestry companies. Frankly, these companies maintain their forests in such a way that the fire safety, wildlife population, accessibility and general appearance are all substantially superior to the national forests. (Individual, No Address - #510.22000)

The enviroliars put out this nonsense that the users (logging and mining especially) have done irreparable harm to our wildlands. Nothing could be further from the truth, modern regulations and practices treat the forests better than doing nothing at all. The forests need professional multiple use management. (Individual, Red Bluff, CA - #2341.21500)

Current management under the multiple use mandate must be working, the wilderness lobby "finds" tens of millions of acres of public land every year that now qualify for designation; multiple use must foster that growth of wilderness quality lands, restriction may jeopardize that success. (Recreational Organization, Los Alamos, NM - #5663.21000)

Public Concern: The Forest Service should abandon the proposed rule to maintain flexibility to meet the future resource needs of society.

Our country needs & will need in the future resources from a well-managed forest system. Roadless area conservation will end with more wilderness & National Parks being a goal. Management options are needed for the public's best interests. We don't need lock-outs or set-in-stone rules. We don't need more wilderness … we may need resources from our National Forests due to a national emergency in the future (Individual, Sheridan, WY - #7404.21000)

The proposal is a retreat from the basic and sound principles embodied in multiple use and sustained yield management. A basic tenet of multiple use is to manage the forests not according to an unchanging rigid prescription but to serve the changing needs of a changing society, those uses ranging from timber harvest to wilderness preservation. (Individual, Juneau, AK - #8099.21000)

The national forests have been mandated to provide sustained multi-use for the American public. One of the identified multiple uses includes the silvicultural management of the forests' primary renewable resource, timber. Much of the pulp and paper and forestry industry relies on the sustained management of the national forest resources as a source of wood pulp and products. (Business Association, East Lansing, MI - #1043.21300)

To make this rule a viable one for our area, it must not impinge upon the needs of our local commerce, business, and recreational purposes. Our economy is simply needful of these forests for these many uses. I would urge this rule to be created in such a way that these lands can be "reserved" yet not allow for lands already in use to be converted from their present use. I understand this will be a large undertaking but feel it is imperative for our local economies that as much flexibility as possible be maintained. (Individual, Park Falls, WI - #2757.21300)

Our National Forests belong to all Americans and should be managed to provide for their needs. The Forest Service should be mindful of its motto of "Caring for the land and Serving the People," not Serving the Environment at the Expense of the People. Meeting the needs of the public, while maintaining forest health and protecting the environment are not mutually exclusive. Proper management can and should achieve both. (Business, Arlington, VA - #43882.10200)

Public Concern: The Forest Service should manage the national forests like farms.

On the farm where I was raised, after seventy-five years of its yielding wood, water, wildlife, and recreation, our forest is as beautiful and productive as ever. It helped support our family as its skid roads, soon to be overgrown, gave access to wildflower gardens, berry patches, ever flowing springs, scenic vistas, special camping sites, and the trees that we harvested to heat our home or for lumber. Never was there a rule that said "no roads allowed." Our farm forest in miniature, is what a national forest should be. (Individual, Juneau, AK - #8099.10200)

When did the US Forest Service change from its function to manage the forest as an agricultural product? As a subdivision of the Department of Agriculture, was it not created to manage the forest as a renewable crop, to be harvested and replanted like all other crops? (Individual, Bigfork, MT - #10834.20000)

Public Concern: The Forest Service should adopt European forest management practices.

During an extended visit to Europe, and principally in Switzerland, we had the opportunity to HIKE some of their MANAGED forests. They very SELECTIVELY cut OLD and/or diseased trees and label and stack them in the forests for subsequent transport to the mills. They also reduced the undergrowth fire hazard. Motor vehicle access was limited by permit and dated decals. The roads served multipurpose including hiking for picnics and other recreational uses, as well as for harvesting and transport of timber. Some permanent cabin living quarters served a watchdog capacity for security much like that observed in Canada's National Parks. We encountered very little traffic during our hikes and NO off road vehicle roughhousing! While I realize Switzerland is quite small compared to your jurisdiction, I believe they furnish us some possible guidelines for managing our forest lands. (Individual, Bozeman, MT - #320.21000)

For examples of excellent forest management for multiple uses, I recommend the Forest Service study the practices which have been utilized for centuries in Europe, especially in Germany and Finland, which could be adapted and applied to the areas now being considered for closure. Abandonment of scientific management of these lands would not only be wasteful of natural and recreational resources, it would be patently foolhardy. (Individual, Escanaba, MI - #18499.23000)

Public Concern: Multiple use management should include motorized recreation.

I am writing to express my support for the principle of multiple use management of our public lands. Allowing responsible motorized and non-motorized recreation on our public lands. (Individual, Bellingham, WA - #352.21400)

There are far too few places to participate in off-road activities now, and this will make matters much worse. There is room for MULTIPLE USE in the Nation's forests, this plan calls for single use, and it stinks. (Individual, Fort Bragg, CA - #19847.21400)

1.2.3.2 Non-Commodity Resources and Multiple Use Management

Public Concern: The Forest Service should not manage roadless areas for traditional multiple use that emphasizes commodity extraction.

Roadless areas are not safe when left open to "multiple use." (Individual, Olympia, WA - #540.21000)

While I do not prefer total roadless areas I feel that logging, mining, cattle grazing and other destructive types should not be allowed in these areas. There are many persons who are unable to hike into these areas who would like the opportunity to see these beautiful places. Therefore some roads are necessary, but only to view the areas. We have too many tree lots now that are no longer forests. We do not need more. The logging companies can continue to use their tree farms. (Individual, Tucson, AZ - #2068.21000)

Preventing road construction in remaining unroaded areas is wonderful, but this landmark issue is more than just roads. It is about preserving more wild areas from all destructive aspects of the multiple use doctrine. Logging must not be allowed in these remaining wild areas as well. Neither should mining or damming. (Individual, No Address - #1952.21300)

We would now like to turn our attention to the management concept of "multiple use objectives." Historically, this management practice has decimated Pacific Northwest's beloved ancient forests, [and] muddied our salmon-bearing streams and rivers. In a recently published study by Dr. Thomas Michael Power of the University of Montana titled "The Economic Impact of Preserving Washington's Roadless National Forests," he calls multiple use "a fantasy built around ignorance of unavoidable damage, that road building and commercial extraction causes to other forest values." WE IN THE SEATTLE AUDUBON FIRMLY BELIEVE THAT THE MANAGEMENT CONCEPT OF "MULTIPLE USE OBJECTIVES" IS DIRECTLY AT ODDS WITH THE INTENT OF THIS ROADLESS INITIATIVE. It is time that the FS should abandon this destructive and unsustainable management philosophy. (Environmental/Preservation Organization, Seattle, WA - #44259.21200)

Public Concern: The Forest Service should shift its management approach of roadless areas to recognize that recreational and ecosystem values outweigh commodity values.

This bank of undeveloped land is more valuable than all of the mineral and timber wealth it contains. Over the years recreational and wildlife uses will be [the] more important commodity due to development pressures in the rest of the country. It is our future. (Individual, No Address - #31.22300)

In the overall planning for management of national forests, it is important to include roadless areas where the values of biodiversity and quiet recreation can be upheld. I am not opposed to best management practice timbering on portions of national forests, but as the population of the U.S. increases, more and more folks look to the forest lands for places of solitude, self-renewal, and quiet recreation. Here too, in roadless tracts, we can protect biodiversity for its value to tourist-based economies, wildlife habitat, and as sources of plant genetic material. (Individual, Eagle River, WI - #1583.22000)

Protection of these roadless areas not only makes ecological sense, it makes economic sense. It is time to put a stop to the wasteful and destructive practices of the past and protect our national heritage. This land belongs to all the people, not just the few who want to exploit it for quick profits with no thought to the costs, both ecological and economic, to the vast majority of citizens and taxpayers. They have had their 90%, save the rest for the people of this great nation. (Individual, Springfield, IL - #7499.41500)

Public Concern: Multiple use management in roadless areas should emphasize non-consumptive uses and values.

I strongly support President Clinton's Roadless Area proposal. The vast majority of America is blanketed by roads. The National Forests have thousands and thousands of miles of roads. What's rare nowadays is an area without a road. Forests are managed for multiple use. Ecosystem protection and non-motorized recreation are key uses. We should stop building roads in the National Forests to advance these uses. (Individual, Hampton, VA - #5236.10100)

Most National Forest land has been dedicated to a single purpose - logging. Please preserve what few roadless areas we have left as it is obvious that these areas will be critical for the wilderness and recreational needs of a growing population. (Individual, Chicago, IL - #1336.90000)

Roadless areas do indeed support multiple use. It is just that the mix of uses is different from the mix found in areas utilized for motorized recreation. Habitat for certain endangered species and primitive recreation in a quiet, natural setting are uses that cannot be accomplished in areas laced with roads. Multiple use does not mean every use on every acre. This is simply not possible. It certainly does not mean motorized vehicles on every acre where it might be feasible to drive them. (Individual, Lakewood, CO - #12965.21000)

I am confused by the concept of “multiple use” which I can only assume allows timber harvest, ATV use, and other destructive, impactful uses. I think the concept of multiple use is only valid if “USE” is disconnected from “CONSUMPTION” or “HARVEST.” Those varieties of “use” are destruction, fragmentation; “SENSELESS USE” in a nutshell. (Individual, Minneapolis, MN - #1887.21300)

If all lands end up roaded, logged & mined etc., then our forests will not truly be MULTIPLE USE. (Individual, Standard, CA - #9721.2100)

Some of the worst clearcut areas are not on private land, but public land that we as taxpayers and citizens own and expect protected. One area that comes to mind is the southern approach to Olympic National Park. How could you allow such desecration? We trust that multiple use will come to mean more than use and destruction by mining and lumber interests. We need to preserve what little you have left us. (Individual, No Address - #2945.21300)

EMPHASIZE WILDLIFE AND HABITAT VALUES

Wildlife and habitat for wildlife is one of the multiple use objectives of the Forest Service. Too often, habitat for wildlife does not seem as valued as much as development activities are valued. Yet, wildlife are an important natural resource to our future and to the long-term health of our forested ecosystems. (Individual, No Address - #5197.22000)

As a Forester and a believer in multiple use of forests, we still need wilderness areas for the protection of wildlife and native plant life. Wildlife requires some tranquility and they can't get this in small areas. (Anonymous - #9825.21500)

CONSIDER THE OVERALL VITALITY OF THE ECOSYSTEM

The concept of “Multiple Use” needs to be adjusted enough to insure continued vitality of what remains--enough to perpetuate for continuing use and for acting as seed-bank for organisms of a balanced ecosystem. (Individual, Medford, OR - #16968.10100)

The highest and best use of our public lands in the coming century will be to maintain the processes and functions required for ecological integrity, the protection of our priceless watersheds, and the preservation of our wildlife heritage. The protection of large roadless areas across the broadest possible range of landscapes will be essential to this effort. (Individual, Cody, WY - #9386.22000)

Public Concern: The Forest Service should adopt the proposed rule to preserve commodity resources for the needs of future generations.

If a national emergency occurs in which we need the resources provided in these wild lands, they will still be there, available for our national needs. They won't have been ripped out and sent overseas to the highest bidders. Nor will they have been taken for granted and wasted on nonessential expansion. Just as we need our petroleum reserves, we need these "reserves" of wilderness. (Individual, Idaho Falls, ID - #6876.63000)

Public Concern: Multiple use management of roadless areas should not include motorized recreation.

I feel multiple use should not be a free-for-all, nor use by the loudest or most intimidating pressure group. There should be opportunity for quiet hiking or observation without the distraction and worse of motor powered devices of any sort. Other areas should allow motorized recreation, but be regulated so as to limit injury to plants and animals. (Individual, Springfield, VT - #2234.21400)

I understand the Forest Service's mandate under the Federal Land Policy Management Act (FLPMA) to manage for multiple uses, including off-road vehicles. However, on the national forests in central Utah alone there are already over 1,700 miles of ATV trails. Ample acreage must also be set aside for non-motorized recreation including backpacking, hiking, and bird watching. These too should be considered as important multiple uses, for which we desperately need permanent protection of roadless areas. (Individual, Las Cruces, NM - #19477.21400)

We urge the Forest Service to take the strongest possible action to protect all roadless areas under 1000 acres within its jurisdiction. This must include barring access by any off road vehicles or machines, whether for recreation, fire control or any perceived need temporary or otherwise. Allowing just a chosen few, including Forest Service personnel, to violate roadless areas negates the whole purpose of protection. (Individual, Loomis, WA - #9203.10110)

DEVELOP A NATIONAL RULE TO PROHIBIT OFF-ROAD VEHICLE USE

We are concerned about off-road vehicle (ORV) use in existing roadless areas and believe such use should be curtailed and in a great many cases eliminated because these machines are incompatible with the fragile ecosystems found there. Roadless areas should not be subjected to uses that degrade their wild character. The draft policy (Roadless DEIS) fails to provide a national rule on off-road vehicle use in roadless areas, instead leaving it to be decided locally, by Supervisors of each National Forest. To preserve the integrity and wild character of roadless areas, we believe it is necessary to greatly restrict off-road vehicles in roadless areas, subject to only very limited local variance. While some discretion might be allowed the Supervisors, particularly in cases of life-threatening emergencies and in areas where limited subsistence use might be provided for isolated communities, we believe that strong direction should be given in the national policy that places the ecological values above the destructive and frequently annoying use of motorized recreation. (Environmental/Preservation Organization, Seattle, WA - #10788.91612)

I am disappointed that the Forest Service has apparently determined that regulation of Off Highway Vehicle (OHV) use is an inherently local issue. I disagree and feel that the agency should establish national guidelines to assist local Forest Service officials make sound management decisions regarding when and where use of OHVs should be permitted. I do not feel that unroaded portions of inventoried roadless areas are an appropriate location for such an activity, particularly given the roadless area characteristics that the proposed rule is designed to protect. The Forest Service should either incorporate nationwide restrictions on OHV use within the proposed roadless area conservation rule, or expeditiously initiate a separate rulemaking proceeding to regulate the use of OHVs. (Individual, Brighton, IL - #50615.21400)

Chapter 2 Consultation, Coordination, and Public Involvement

This chapter covers public concerns about the processes used by the Forest Service to obtain and consider the informed input of interested individuals, groups, tribes, and government entities. While some respondents praise the Forest Service for its efforts, many complain that, in the case of the proposed rule, the process is biased, opaque, rushed, and politically motivated. The result of these perceptions, evident in many responses, is a substantial lack of public trust in Forest Service decision-making processes at both the national and forest level.

Issues of Coordination and Cooperation are treated in Section 2.1, Rulemaking Processes in Section 2.2, Issues of Trust and Integrity in Section 2.3, and Public Involvement Processes in Section 2.4.

2.1 Coordination and Cooperation

Many respondents believe there is a general lack of coordination and cooperation by the Forest Service, both internally and with entities outside the agency. Comments regarding these issues come from other government agencies, especially states and counties, special interest groups, and individuals. On the whole respondents urge the Forest Service to create a compatible, open environment that promotes shared solutions within land management decisions. Comments specifically addressing Coordination with Government Entities are covered in Subsection 2.1.1, and comments addressing Tribal Consultations are reported in Subsection 2.1.2.

Public Concern: The proposed rule should call for continued efforts in creating compatible working arrangements among the Forest Service, special interests, and the general public.

Locking up our forests is not caring for them. It is not responsible forest management. We were getting so close to "getting it right" in the management of Forests and Wildlife; and in a compatible working arrangement between the Forest Service, the public, sportsmen and industry. (Individual, No Address - #6375.41000)

Somehow raise the discussion out of the "we-them" that loggers seem to sense—need the wisdom and experience of conscientious and responsible timber folks, no doubt loggers for the most part have deep respect and love of the forest-somehow the cause is poorly communicated. (Individual, Ferron, VA - #9610.41720)

More national direction is needed to help define roadless areas and how to protect them. (Individual, Ashland, NH - #43178.41000)

There is room for all users out there. My son and I would like to recreate responsibly on the PEOPLES' land. Why won't the "enviros" WORK WITH US not against us? (Individual, Hampton, NH - #7672.41700)

We also urge the agency to use advisors from all user groups in future rulemaking. (Individual, Klamath Falls, OR - #13671.41700)

2.1.1 Coordination with Government Entities

A number of respondents share concerns over the Forest Service's coordination efforts with local conservation districts, counties, states, tribes, and elected officials. Many note the need for increased local involvement in the decision-making process for the final rule. Others urge the Forest Service to address the impacts of the proposed rule on other agencies' coordination efforts, with specific reference to the Unfunded Mandates Executive Order of 1995 (see Chapter 3 for legal concerns relative to this order). A number of respondents believe the Forest Service should collaborate with individual state and county governments regarding local jurisdictions. One county specifically notes that the Forest Service "did not take into account the ecological and resource use factors that other agencies contribute through their management for biodiversity, eco-regions, etc." According to this county, "If the Forest Service does not want this analysis on a national scale the agencies to collaborate with are the individual county governments concerning each individual case."

A number of government entities express a need for more information on how the proposed rule would affect management access for state and local agencies to carry out their responsibilities for e.g. the abatement of noxious weeds, wildland fire suppression, and developed water infrastructure and wildlife management. One individual suggests a Memorandum of Understanding (MOU) between the Forest Service and county commissioners outlining road management strategies for roads within county jurisdictions. Another individual suggests, in addition, that more cooperative planning is needed between the Forest Service and state and local agencies to address community concerns.

In addition to concerns over coordination with respect to management, respondents also voice concerns over coordination with respect to analysis. One county, for example, asks why the Forest Service did not include local conservation districts in its analysis for this proposal, nor even include them in its distribution list for the Draft EIS. Others cite the need for the Forest Service to do a better job of involving all federal land management agencies in its analysis, as "natural resources…do not recognize administrative boundaries." Finally, a number of individuals believe the federal government should coordinate the expansion of roadless areas onto non-National Forest System lands.

Public Concern: The Forest Service should increase local involvement in decision-making process for the final rule.

The 2nd round of decisions on further roadless areas for consideration this fall/summer needs multi agency collaboration on local levels to establish criteria for those decisions. (Individual, Grand Rapids, MN - #671.40000)

The Proposed Rule Is Contrary to Law Because It Evades Statutory Requirements of Public Participation In the Planning and Management Process (including administrative remedies) and Requirements of Coordination with Local Government. Stewards of the Range members have reviewed the comment submitted by the Modoc County (California) Board of Supervisors, agree with the content of that comment and urge compliance with the recommendations of that comment. Stewards incorporate herein by reference all contents of that comment, and particularly emphasize herein the comments related to dilution of public and local government involvement. The Modoc County comment states: "The new Rule eliminates the mandatory requirement of Service [Forest Service] to

coordinate planning with state and local governments are notified considered and may participate in Service planning. While on the one hand the Service says one of the goals of this new rule is to increase collaboration with the public it replaces mandatory involvement with discretionary input, left solely to the whim of the decision offer to 'provide opportunities for involvement.' This is unacceptable. It ignores the record of success that has always followed full cooperation and coordination between the Service and local government. It also sharply reduces the public opportunity to be involved through the NEPA process. [The public's] NEPA rights will be reduced to the project level where the management sideboards will have already been decided (without their full input) at the broad assessment level." Members of Stewards of the Range have witnessed the success of county government involvement in land use planning through the coordination mandated by Congress in various statutes. Current Forest Service regulations require such coordination, as do BLM regulations. The proposed rule departs from this course set by the Congress. (Individual, Las Vegas, NV - #15882.54100)

Public Concern: The Forest Service should address the impacts of the proposed rule on other agencies' coordination efforts.

This DEIS and the associated proposed rule amendment violate the Forest Service Agency Directive that resulted from President Clinton's Unfunded Mandates Executive Order of 1995. All language in the DEIS that does not adequately address the availability of funds, and all changes in the Forest Plans that are to be revised and/or amended through the Decision resulting from the final EIS requiring additional funds, must be funded for implementation through appropriated funds. Otherwise, all such unfunded mandates must be removed from the documents in deference to this Order and subsequent Agency Directive. (Business Association, Beaverton, OR - #52230.55500)

The manner in which the Roadless Area Initiative is being implemented violates the National Forest Management Act and the Wilderness Act. The Roadless Area Initiative itself violates the Multiple Use Act, and is another unfunded mandate, which Washington D.C. bureaucrats are attempting to force on rural citizens who live in, use, and depend on the forest. (Individual, Mercer Island, WA - #10319.53000)

Public Concern: The Forest Service should collaborate with individual state and county governments regarding local jurisdictions.

The Forest Service did not take into account the ecological and resource use factors that other agencies contribute through their management for biodiversity, eco-regions, fragmentation, size, open space, roadless recreation, etc. The Bureau of Land Management, National Park Service, Fish and Wildlife Service, all should be considered. Since this analysis is on a national scale all agencies need to be considered for their contribution to the numerous ecological and resource use factors. If the Forest Service does not want this analysis on a national scale the agencies to collaborate with are the individual county governments concerning each individual case. (County Elected Official, Goldfield, NV - #16085.82000)

If there is to be local control, which on the surface seems to be the best way to go, I would like to see a memorandum of understanding [MOU] between the Forest Service and the county commissioners, who ultimately are in control of the roads within their counties. The MOU should outline which roads can be counted on to remain open, which ones would likely be seasonally closed, the date they can be expected to be reopened and which roads would be permanently closed. There should be a moratorium on road closures in the Big Horn Mountains until such time as all roads previously closed without public comment are either reopened or remain closed with the blessings of the county commissioners. Without the involvement of the county commissioners, I am not clear as to the legality of the roadless area moratorium. (Individual, No Address - #22023.40200)

Terrestrial and Aquatic Plant Species Comment: Entire Section--States and local governments have concurrent jurisdiction over many issues, and primary over many others, that are interwoven and incapable of separation from any realistic examination and disclosure of effects. In this case, states and county weed boards have jurisdictional responsibilities for the containment and control of invasive non-native plants, e.g., noxious weeds. This includes

land administered by the Forest Service. Again, no consideration or discussion is given of how this proposal could affect local control of noxious weeds in these roadless areas. Will there be increased costs associated with noxious weed management incurred because of the proposed restrictions on roads in current roadless areas? These issues need to be discussed and disclosed. (County Elected Officials, Worland, WY - #16185.71100)

The Forest Service must consult with local communities to adequately evaluate and disclose the effects of catastrophic wildfire on public safety, health, and impacts. (County Elected Officials, Worland, WY - #16185.41600)

While USFS is a federal institution more cooperative planning is needed with state and local agencies to handle other employment revenue matters which are in discussion here such as: other transportation alternatives, and developments, tax codes, wage initiatives, etc. (Individual, Corvallis, MT - #9400.40200)

The Forest Service should explain why the local conservation districts were not included in the analysis, nor included in the distribution list, as mandated by the 1996 Farm Bill.

Comment: General--The 1996 Farm Bill signed by President Clinton expanded the role of local county conservation districts in resource management, including lands administered by the federal government. The local conservation districts need to be included in decisions affecting soil, water, noxious weeds, etc. Nowhere in the document have their roles and responsibilities been acknowledge or defined.
Relief: The Forest Service must explain why Conservation Districts have not been included in this analysis. In addition, Conservation Districts were not included in the distribution list (Page 4-9 through 4-11) and never mentioned in the entire document. (County Elected Officials, Worland, WY - #16185.40200)

Public Concern: The Forest Service should do a better job of including and involving all federal land management agencies in its analysis.

There needs to be more information in the Final EIS on other roadless areas of other federal agencies which may be relevant in assessing the management of inventoried roadless areas and unroaded areas on the National Forests. Natural resources, of course, do not recognize administrative boundaries. For a true understanding of the significance of any roadless area on the National Forests, it is necessary to not only examine their context with regard to other lands on the National Forests, but also to adjoining lands of other federal agencies. At the very least, the Final EIS should include a map of Wilderness Study Areas of the BLM.
Such an analysis of adjoining roadless areas on other federal lands is also consistent with a current management trend of coordination between the BLM and the US Forest Service. Examples include the shared administrative facilities between the BLM and the Fremont National Forest in Lakeview. Additionally, it was recently announced that there would be a consolidation of management among the Ochoco and Deschutes National Forest and the Prineville BLM. Such coordination among the agencies is long overdue. This Proposed Rule and EIS would go a long way in advancing this kind of coordination by providing information in the Final EIS of the location of the BLM WSAs. (State Elected Official, Salem, OR - #18661.40110)

Public Concern: The federal government should coordinate the expansion of roadless areas onto non-National Forest System lands.

I am in support of adding more roadless areas to the National Parks and other Federal lands.
There are too many people using these areas now and we don't need more ATV's, Bikes, etc. on them. (Individual, Thermopolis, WY - #8616.91600)

I think the Federal Government should work with states like Maine, New Hampshire, Vermont and others to preserve roadless areas on the State and private lands. (Individual, Burlington, VT - #421.40200)

Does the rule only apply to the Forest Service and not to other agencies? (Individual, Pocatello, ID - #2959.63000)

2.1.2. Tribal Consultations

Several respondents emphasize the need for tribal consultations. One tribal representative maintains that the Forest Service should continue to consult with tribes if the decision falls outside the proposed action or preferred alternative. Another individual points out that the Forest Service "needs to come to Standing Rock Reservation to consult with [the] Tribal Government on [the Draft] EIS. There are roadless areas within the boundaries of the Standing Rock Reservation, therefore consultation will be needed." Finally, an environmental group points out that "the Black Hills is holy sacred land to the Lakota. The Forest Service should 'bend over backwards' to fully include Lakotas in any discussions about the future of this sacred landscape." (See Chapter 3 for additional tribal concerns.)

Public Concern: The Forest Service must consult with each effected nation if the final rule and record of decision goes beyond the proposed action.

The Tribal Committees are requesting that the following items be considered when adopting the Rule: Continue to consult with The Native American Tribes regarding any future proposals or decisions other than what has been proposed as the preferred alternative for the "Roadless Area Conservation Proposed Rule." (Tribal, Grand Ronde, OR - #29958.73100)

USFS needs to come to Standing Rock Reservation to consult with Tribal Government on EIS. There are roadless areas within the boundaries of the Standing Rock Reservation, therefore consultation will be needed. (Individual, Ft. Yates, ND - #3407.40300)

The Lakota maintain they have legal claims to most of western SD, which was once part of the Great Sioux Reservation. In 1980 the United [States] Supreme Court acknowledged that the Black Hills had been illegally taken from the Sioux people and that they have a standing unsettled legal claim to the Black Hills. However the Supreme Court ruled differently on the taking of the rest of western SD. The Black Hills is holy sacred land to the Lakota. The Forest Service should "bend over backwards" to fully include Lakotas in any discussions about the future of this sacred landscape. (Environmental/Preservation Organization, Rapid City, SD - #52237.56000)

2.2 Rulemaking Process

In a very general sense (which is expanded upon in Chapter 3) there is a perception among many respondents that the Forest Service is using the rulemaking process as a means to circumvent the local planning process, existing laws, and the will of Congress. According to one respondent, the rulemaking process "will undermine the cooperative dialogue that occurs during forest plan revisions and will cancel years of research, and scientific analysis, collaboration and compromise." Another respondent charges that "this rulemaking process is politically driven, and is not science-based. It blatantly circumvents both the forest planning process and the Wilderness Act." Many advise, therefore, that the process should ensure fairness by using an open decision-making process. Some respondents believe such a process could be achieved by using advocacy groups who are immune to political pressure. Others suggest that what is really

needed is for "interested parties across the country to put aside their differences and submit proposals for protecting roadless lands based on a cross section of interests and a balance of viewpoints."

Another concern is the speed at which this proposal is moving forward. Many respondents express suspicion over the motives behind "rushing [this process] through," noting that much smaller projects can take two to three times as long to plan and implement. As one respondent states, "How can this happen so fast when USFS cannot put up a salvage timber sale in less than 3 years?" Others say this proposed rule should be delayed until the other rules pending are finalized.

Finally, some respondents believe the Forest Service should have better defenses against groups that try to hold up decisions and management activities by filing local appeals and litigation. As one individual puts it, "The Forest Service should be able to do [its] work without interference from outside political and environmental groups who care nothing about the people who are affected at the local level."

In addition to the above concerns, respondents raise a number of concerns over the rulemaking process with respect to the authority for carrying it out and the parties who are or should be involved in doing so. Concerns are further divided into the following subsections: Subsection 2.2.1 Authority; Subsection 2.2.2 Role of the Forest Service; Subsection 2.2.3 Role of States and Counties; Subsection 2.2.4 Role of Citizens; Subsection 2.2.5 Role of Special Interest Groups; and Subsection 2.2.6 Local versus National Decision-making.

Public Concern: The Forest Service should use the land management planning process, instead of rulemaking, to make forest level land use decisions.

In commenting on the Roadless Area Conservation rule, PVOA had to weigh the benefits of the fisheries habitat protection that would be derived from a road prohibition versus the principle of invoking a new national mandate that would override a long term existing planning process, i.e., the Forest Plan process. The existing forest plan process (such as TLMP) is a process in which many parties have participated with considerable time and energy in good faith. As tedious and time-consuming as the Forest Plan process might be, PVOA supports that process over a one-size-fits-all proposed rule such as the roadless initiative. The present Forest Plan process seems to provide more opportunity to use science and specific local knowledge in land management designations and decisions as opposed to a broad national policy that is based on general philosophy. (Business/Business Association, Petersburg, AK - #7542.72230)

One of my greatest fears is by some stroke of a pen in Washington, D.C. my future use of our public lands will be greatly and adversely impacted. (Individual, Sun Valley, NV - #8192.41100)

The Forest Service's rushed scoping also violated NFMA regulations. The final rules would constitute DE FACTO amendments to the forest plans, since they alter the multiple use allocation of currently roadless areas made in forest plans. There are powerful legal arguments that the NFMA and implementing regulations only allow multiple use decisions to be made through a public forest planning process at the individual national forest level, and do not allow the publicly-prepared forest plans to be cast aside through national rulemaking. See 16 U.S.C. 1604(d)-(k); 36 C.F.R. 219.4. The only national-level planning that Congress has authorized is the RPA Program that only applies at the forest level to the extent specifically incorporated into an individual forest plan. See 16 U.S.C. 1602, 1606, 36 C.F.R. 219.4. (Mining Organization, Reno, NV - #15907.44410)

There is no need for this roadless area initiative. It is a top-down, one-size-fits-all administrative fiat that negates the existing local-level forest planning process. It undermines the cooperative dialogue that occurs during each forest's plan revision and will cancel years of research, scientific analyses, collaboration, and compromise. It will veto the decisions on roadless area management that were developed for every inventoried roadless area in existing forest plans by agency personnel, industry representatives, environmentalists, elected officials, and community activists through an open public process--decisions made by the people most knowledgeable about the national forest lands. (Timber Association, Washington, D.C. - #29962.41240)

Public Concern: The Forest Service should not use the rulemaking process as a means to circumvent existing laws.

This roadless proposal is a back door attempt to circumvent existing laws and the will of Congress to create more wilderness areas. This is not in the best interests of the people, the forest or the environment. This proposal is clearly based on the political agenda of the lame duck president catering to a few well-financed radicals who claim to be environmentalists. (Individual, Youngsville, PA - #8285.41000)

I believe that the proposed roadless areas are the administration's way of circumventing the law to put more land off limits to resource management. VP Gore has already said that there will be no timber harvesting in these areas before the people have spoken. (Individual, Susanville, CA - #3585.41100)

The only appropriate venue for considering land allocations on any national forest is through the NFMA-mandated individual forest plans in which all multiple use considerations and social and economic impacts must be considered. The basic premise of a nationwide roads prohibition is counter to the existing Forest Service planning process and its current set of proposed planning regulations. Both the current forest planning process and the proposed planning regulations emphasize local decision making. The preferred alternative is a top-down management decision that forces managers to make decisions based on a national policy that does not reflect local conditions. One need look no further than the Forest Service's proposed planning regulations to see how important the Agency finds public involvement and collaborative decision-making at the local level, yet this proposal denigrates local involvement and seems in no way consistent with the proposed planning regulations, current Forest Service policy, or common sense. (Individual, Anchorage, AK - #52495.41240)

I do not believe that this attempt to circumvent Congress is legal and I strongly oppose this attempt to change the regulations without going through the legislative process. I ask that you uphold our Constitution and put it before Congress. (Individual, Canon City, CO - #1104.52000)

This rulemaking process is politically driven, and is not science-based. It blatantly circumvents both the forest planning process and the Wilderness Act. This Administration has repeatedly called for more local, collaborative decision-making, yet this process did not involve local citizens, or even USFS employees at the ranger district level. (Individual, Missoula, MT - #10621.42000)

Our democratic government was not structured so that a federal agency could bypass Congress and change laws through rulemaking without due process, namely without the ability to appeal. (Individual, Challis, ID - #8034.41000)

Public Concern: The Forest Service should ensure fairness by using an open decision-making process.

The USDA needs an advocacy panel or group to ensure fairness in this process. "The fox is guarding the chicken coop." (Individual, Redding, CA - #13870.42000)

There is need for a watchdog advocacy group that won't have to worry about pressure from politicians…. (Individual, Redding, CA - #13870.41000)

By assessing project by project and not all roadless areas at once it makes it increasingly difficult to have the public input. (Individual, Olympia, WA - #540.44000)

The Forest service should suspend the decision process long enough for interested parties across the country to put aside their differences and submit proposals for protecting roadless lands based on a cross section of interests and a balance of viewpoints. (Individual, Coeur d'Alene, ID - #10962.44400)

My strong choice is to cancel the current scheduled public meetings, junk the current initiative, and create a group to objectively develop a new initiative that is consistent with the Clinton guidelines. (Individual, Spokane, WA - #4546.64150)

I recommend choosing the No Action alternative (Alternative #1) with the following constraints:
Accelerate the completion of planning under RARE II for all the Roadless Area Acres.
Balance planning teams so that resource based planners at least equal the numbers of environmentally inclined planners. Include representation from the following groups as advisors and participants in the planning process. 1. Industry representatives from resource user groups. 2. County Commissioners. 3. State Resource management agencies. 4. Others as appropriate. Revise the appeals process to quickly dispose of frivolous appeals and lawsuits designed to delay planning decisions of designated roadless areas. (Individual, Kooskia, ID - #6765.71230)

Public Concern: The Forest Service should consider the timeframe being taken for this rulemaking process and implementation.

How can this happen so fast when USFS cannot put up a salvage timber sale in less than 3 years? (Individual, Missoula, MT - #11526.41000)

At issue is the timing as well as the process for developing the DEIS. (Individual, Elko, NV - #8412.41000)

It is my opinion that this plan is being rushed through without proper planning. It bears all the marks of special interest groups trying to ramrod their wishes past an uninformed public. The DEIS lacks thorough insight into all of the ramifications of this sort of move. It was done in haste and is not in the best interests of the forest or the taxpayer. (Individual, La Grande, OR - #7671.42000)

I take strong exception to the unprecedented actions of the agency in secretly soliciting and relying on the advice of a narrow spectrum of special interest groups in the development of road rules and policies to be submitted for public comment. (Individual, Klamath Fall, OR - #13671.41700)

The planning has been hurried along with little or no consideration for the good of the forest as a multi-use area as the basic plan of the Forest Service has been for lo these many years. This planning is being rushed into the system to keep a larger percentage of the public out of the woods for any and all recreation activities. The plan is to reserve the forest for only a few selected people to enjoy. (Individual, Klamath Falls, OR - #11357.43000)

The timing of the rule, making it known to the public appears motivated by political schedules, the presidential election, not by the demands of due process. (Individual, Union, OR - #14344.43000)

I also strongly disagree with the rash and headlong speed this proposed rule is moving through the Environmental Impact Statement processes. It normally takes years of research and scientific study to fully address all concerns, effects, and options of a proposed action. I cannot understand how a complicated issue such as the Roadless Area Conservation Rule can progress through both draft and final EIS processes and be put into effect in less than a year. (Individual, Eagle Creek, OR - #8302.44420)

The time period for an E.I.S. to be completed on two thousand acres for the average timber sale is two to two and one-half years. How can the U.S.F.S. expect us to believe that the E.I.S for over sixty million acres can be completed in less than one year? (Individual, Eagle, ID - #8450.44420)

The fast track that the current EIS is on is ludicrous and appears to have been front-loaded from the beginning (judging from the public meetings I have attended). Even FS employees are bereft to explain the resulting consequences from the proposed action. (Individual, Kneeland, CA - #7085.44430)

In addition, we believe this “fast track” plan is designed to be implemented before the November elections and we're appalled that the future of our wild lands is being used as a political pawn. (Recreational organization, Redding, CA - #7388.44420)

I strongly disagree with the rash and headlong speed this proposed rule is moving through the NEPA process. I find it difficult to understand how you can justify spending only two months on a DEIS encompassing such a broad and diverse mass of public domain when you would require a minimum of a year for the same process for development plans on a much smaller parcel of land. (Business, Diamond Lake, OR - #8499.44420)

You had about six months to evaluate an initiative impacting some 40 to 60 million acres on 140 national forests in 37 states. It simply couldn't be done. You folks have struggled to produce IN A YEARS TIME DEIS's on the smallest of federal management proposals. (Individual, Kalispell, MT - #9470.44420)

The quality of the DEIS reflects the rush in which it was produced. It lacks specific studies designed to provide useful information to support it. It misuses, misunderstands, and misuses other information, resulting in the inaccurate and insulting references to woods workers and logging communities found in Chapter 3. This is not the kind of work we expect from the Forest Service. There is no hurry to get this thing done! If you insist on doing it, do it right. (Individual, Salt Lake City, UT - #13258.44420)

Public Concern: The Forest Service should invoke procedural rules on groups that file local appeals and litigation.

The Forest Service should have more of a defense against certain environmental groups and other radical professionals that can file local appeals and litigation about management activities.
They can stop timber sales; they can cause sedimentation in streams; they can create a potential fire hazard; they can ban or restrict recreational use; all within our national forests, and they simply are not held responsible or accountable to anyone. The Forest Service should invoke rules of procedure upon these groups or individuals that would ensure accountability in case of fire loss or damages. They should be required to post bond or supply proof of insurance before filing appeals and litigation. The local people and landowners would then have some protection against their fabrications and unreasonable conclusions.
The Forest Service should be able to do their work without interference from outside political and environmental groups who care nothing about the people who are affected at the local level. (Individual, Deer Lodge, MT - #705.41710)

2.2.1 Authority

Many respondents applaud the President’s decision to direct the Forest Service to institute the proposed rule. However, nearly all of those favoring protection of roadless areas believe the preferred alternative does not go far enough in meeting the President’s mandate. The indication from hundreds of thousands of form letters is that this rulemaking process is appropriate for protection of roadless areas. People appear to approve of the decision-making process being followed. Many individual letters, however, challenge the carte blanche authority of the administration, some of which express extreme opposition and allege that both the President and the Forest Service are violating laws.

According to many respondents, the Forest Service should rely on current legal tools provided through law and constitutional amendments in its decision-making. The most common comment in this regard is that congressional review is required for a management decision such as this. One individual, for example, expresses opposition over the fact that "this study was not authorized by the U.S. Congress, which is required by law." Many respondents maintain that the President does not have the authority to effect changes in public land management such as this entails. Remarks one individual, "Roadless issues are NOT the responsibility of the American president . . . . We have elected representatives for that." Charges another, "To say that I am upset with these proposals would be putting it mildly. President Clinton's use of the executive order for purposes such as this is a GROSS ABUSE of the power of his office. It circumvents congressional approval (where the people can really have a say) on issues affecting ALL Americans for the selfish benefit of vocal special interest MINORITIES."

Respondents also assert that the authority for implementing this proposal cannot derive from a series of regulations, as a number of writers believe this has. On the other hand, some believe the final rule should reflect the wishes of both the public and the President. More common however, is the concern that the final rule should reflect good management rather than current politics. In this regard, some maintain that the chief of the Forest Service "should be considered a primary expert . . . on national resource management" and so "should be consulted on any policy or activity that he or she is expected to execute." Others make a point of saying that Alaska's political delegation should not be allowed to dictate public land management. And finally, some respondents express the hope that "the good that may come from this process will not be undone by the next (or future) Presidential administration."

Public Concern: The Forest Service should rely on current legal tools provided through law and constitutional amendments in its decision-making.

So in promoting this forest Service Roadless Area Conservation Proposed Rule, I am understanding the Proposed Rule is to expand the Wilderness Areas and designate more wilderness areas without the Forest Service using the proper channels by going through congress first. (Individual, Yellow Jacket, CO - #3295.41000)

Any attempt by the Forest Service to change its mandate without congressional approval is illegal, and should not be considered part of the proposed rule. If the Forest Service insists upon changing its mandate from multiple-use to ecological sustainability, then it is incumbent upon the agency to seek a Congressionally approved remedy. (Individual, Canon City, CO - #1103.41300)

Proposed 294.13 c & d enables added protections in addition to no roads, opening Pandora's box for additional regulations, without review by the public or Congress. (Individual Elko, NV - #8087.33510)

I believe this whole issue should be done in accordance [with] Democratic law and principles—by both houses of congress and the president, not by someone who strives to be king or worse. (Individual, Eveleth, MN - #7953.41100)

I am opposed to this Roadless Area Protection as this study was not authorized by the U.S. Congress which is required by law. The use of mandates and over-use of executive orders has far exceeded its original acceptance. (Individual, Nevada City, CA - #921.41100)

I must express my dismay that the USFS did not think enough of the American public to allow the representatives we voted for to pass judgment on your proposal. To me, this says that the USFS simply does not have the confidence that the proposal would survive the scrutiny of congress and the People. While offers for public comment forums and solicitations for written feedback are a nice gesture on your part, the USFS circumvented the system which was devised to ENSURE that the public's collective voice is heard. (Individual, Ferndale, MI - #10897.41300)

AUTHORITY DOES NOT DERIVE FROM THE PRESIDENT

Roadless issues are NOT the responsibility of the American President….We have elected representatives for that…and it is my understanding that the Forest Service is to take their directives from Congressional approval…not a directive from the President. Please do NOTHING until and unless approved by Congress. (Individual, Kalispell, MT - #2276.41000)

Finch, Pruyn & Co. Inc., respectfully submits that it is beyond the constitutional authority of the Executive branch to unilaterally alter the intent of Congress. We urge the Forest Service to reconsider this proposal and leave forest planning to the industry representative, environmentalists, elected officials, community activists and federal and state agencies in an open, public process at the local level. (Business/Business Association, Glen Falls, NY - #2755.41000)

Our national forests are our property to be shared by all our people and visitors--not just for this present administration in Washington to dictate by executive order the wishes of a select few. (Individual, Buena Vista, CO - #3299.41000)

To say that I am upset with these proposals would be putting it mildly. President Clinton's use of the executive order for purposes such as this is a GROSS ABUSE of the power of his office. It circumvents congressional approval (where the people can really have a say) on issues affecting ALL Americans for the selfish benefit of vocal special interest MINORITIES. I can only hope that more of us in the silent majority flood Washington with our wrath as we see our liberties perverted and/or taken away! (Individual, No Address - #2232.41000)

I am against the Roadless Proposal for the following reasons: It places too much power in the Executive branch of government. (Individual, Vancouver, WA - #2291.41100)

AUTHORITY DOES NOT DERIVE FROM A SERIES OF REGULATIONS

"The overriding attention to biodiversity does not bother me so much as an appropriate policy or a mission. In fact, as a biologist, I support that as a mission---but with considerable reservation as to how management direction has evolved from regulatory agencies. It troubles me that this is a "mission" that has simply evolved out of a series of laws and pursuant regulations, court cases, and policy direction.
This evolved mission should be ratified or rejected--by Congress and the Administration. If such is determined to be the FS's overriding mission, so be it. If Congress disagrees, it has the duty to clarify the situation. At least the committees in Congress should acknowledge the situation." (Timber Association, Medford, OR - #13658.20000)

Public Concern: The final rule should reflect the wishes of the public and the President.

I am a frequent visitor of the Ocala National Forest and it saddens me to see so many roads in a "protected" forest. The Forest Service, as a government agency, needs to make decisions that reflect the wishes of the public and president. (Individual, Lake Mary, FL - #3695.41200)

Public Concern: The final rule should reflect good management rather than current politics.

I have dealt with the Forest Service on and off for 23 years and found that their policies do not reflect good sense but just the idiosyncrasies of the current administrator and Washington Bureaucrats. (Individual, Clinton, MT - #12264.41000)

I believe we should let Foresters manage the Forests & leave the politicians out of it. (Individual, Crandon, WI - #8317.41240)

THE CHIEF OF THE FOREST SERVICE IS THE EXPERT AND SHOULD BE CONSULTED

…the Chief should be considered a primary expert (often through staff) on national resource management policy within the Administration. As such, the Chief (and appropriate staff) should be consulted by higher levels of government as resource management policy is formulated. Political policy decisions conducted in the absence of a thorough knowledge (which the Chief can help provide) of the technical, economic, legal, political, social, historical ramifications of such policy are not apt to produce good results.
The Chief, and in turn the Forest Service, should be consulted on any policy or activity that he or she is expected to execute. (Timber Association, Medford, OR - #13658.41200)

ALASKA'S POLITICAL DELEGATION SHOULD NOT DICTATE PUBLIC LAND MANAGEMENT

This is the chance to do things right. Do not let Alaska's political delegation dictate management of MY PUBLIC LAND! (Individual, No Address - #1973.41000)

I think it is high time that the USFS manages the Tongass like a national forest rather than being dictated to by the Alaska congressional delegation who seems to be able to force you into discarding good science and the lessons learned in the lower 48 and treating this "National Crown Jewel" as simply fiber, a commodity and as a separate entity from the rest of the USFS system. (Individual, Bonners Ferry, ID - #4227.41200)

ENSURE THAT PROGRESS WILL NOT BE UNDONE BY A FUTURE ADMINISTRATION

I hope that the good that may come from this process will not be undone by the next (or future) presidential administration (since this process is being done via the administrative as opposed to congressional approach). (Individual, Boise, ID - #380.41100)

2.2.2 Role of the Forest Service

Some remarks by the public reflect opposing viewpoints on the role of the Forest Service in the decision-making process. Some feel the Forest Service is within its authority to implement the proposed rule. As one respondent observes, "I've heard some people say it today at the hearing, is that the Forest Service is exceeding its authority and side-stepping Congress by trying to enact this policy. And I'd like to disagree with that as well. There is no law that prohibits the Forest Service from protecting roadless areas or deciding that it doesn't want to build more roads." Others would like clarification of the Forest Service's authority with respect to certain issues. Some would like clarification of both the Forest Service's authority to designate conservation reserves and of the total acreage therein. Others ask for clarification on its authority to close access and/or block county roads.

Public concerns relating to the role of the Chief of the Forest Service in the decision-making process reflect a desire for a view independent of politics. Recommendations to this end include the suggestion that the appointment of the chief overlap administrations, and that the chief be able to speak independently from the administration at budget hearings and assume full responsibility for the agency and the results produced. As stated by one individual, "The Chief should be solely responsible for carrying out policy and directing activities of the FS. Within legal and policy boundaries, the Chief should be solely responsible for staffing, operations, and results. Micro-management by Administration political appointees is contrary to any set of management principles with which I am aware."

Public Concern: The Forest Service is within its authority by proposing this rule.

I've heard some people say it today at the hearing, is that the Forest Service is exceeding its authority and side-stepping Congress by trying to enact this policy. And I'd like to disagree with that as well. There is no law that prohibits the Forest Service from protecting roadless areas or deciding that it doesn't want to build more roads. There is a law that requires the Forest Service to only build roads when it can properly maintain them. And currently it has an 8.4 or 8.6 billion-dollar backlog of road maintenance needs. So in a sense, if you build more roads knowing that you're not going to maintain them properly, then you're not really acting in accordance with the law. (Individual, Laramie, WY - #21771.93610)

Public Concern: The Forest Service should clarify its authority to designate conservation reserves.

Where is the authority for designating "conservation reserves"? 2) What happens when an ecoregion is significantly altered by a catastrophic fire--one that burns 50,000 acres in a roadless area? Would it be the intent to close other areas to maintain the acreage in conservation reserves? 3) What do other land management agencies contribute to these numbers? 4) What effect will designating these areas as "conservation reserves" have on local communities who depend on commodity and non-commodity uses of the national forest? Relief: The Forest Service must address these questions, particularly the question regarding the authority to designate "conservation reserves." (County Elected Officials, Worland, WY - #16185.83410)

IDENTIFY TOTAL NATIONWIDE ACREAGE

Comment: Page 3-52 and 3-53--On Page 3-48, the discussion of Ecoregions specifies that 12% of a county's land mass be designated as conservation reserves. However, the discussions on Page 3-52 and 3-53 refers to 12% and 25% thresholds. What is the proper figure? It would be helpful to disclose the contributions of other agencies and private land holdings on the total acreage and roadless acreage within the 83 ecoregions within the continental United States. (County Elected Officials, Worland, WY - #16185.83410)

Public Concern: The Forest Service should clarify its authority to close access.

Do you have the deed to the land you wish to make roadless? Did the state of Utah sell you that land? Did you purchase the land with the consent of the Utah Legislature? Basing the Forest Service action on the Reservation Act of 1907 does not give the FS the authority to violate Article 1, Section 8 of the U.S. Constitution nor does it give the FS ownership of the land. Therefore you have no right to close any roads or create any Wilderness areas in land you do not own.
Can you produce the deed to the Manti-LaSalle or any other land in question? Can you produce documentation that you own the land with the consent of the Utah (or any other State) Legislature? If so, let us see it in open meetings with verification. (Individual, Manti, UT - #1417.50000)

CLARIFY AUTHORITY TO BLOCK COUNTY ROADS

Today June 2, 2000, I took my daughter fishing near Monty campground on the lower Metoius River. About 100 yards upstream from the entrance to Monty campground we encountered a locked gate with a sign saying something about a new roadless designation and closure of this road. It also said it would nominally be opened on May 18. I am disabled and would have obvious difficulty going further, but my concern is that my daughter will not have the benefit of the access we have been accustomed to for many many years. My main point of interest is that this road was county built and maintained and I am wondering about the right to block access. I have seen the county road grader on this road several times myself. (Individual, No Address - #2049.10213)

The roads that are there and that will be built in the future, after construction or reconstruction, should be put in the care and maintenance of the County in which they lay, but roads shouldn't be built in excess of the county's ability to finance the maintenance of them. (Individual, No Address - #2416.93610)

Public Concern: The political appointment of the Forest Service Chief should overlap changes in the administration.

The Chief is appointed by the administration in power through the Secretary of Agriculture. Traditionally, the Chief's appointment overlapped changes in administrations. Such was, to my mind, a good tradition. I hope that it is not dead. (Timber Association, Medford, OR - #13658.41200)

Public Concern: The Chief of the Forest Service should not be influenced by current politics.

Most decision makers at the top have been appointed and not promoted up through the ranks. (Individual, No Address - #1609.42000)

THE CHIEF SHOULD SPEAK INDEPENDENTLY OF THE ADMINISTRATION WHEN PRESENTING BUDGET REQUESTS TO CONGRESS

. . . when the Congressional budget committees consider the budget request, they are deprived of the advice of the Chief's office. I was clearly "discouraged" from presenting views contrary to the Administration's budget position. This has not been, in my opinion, a desirable development. The Congress should be able to rely on the Chief to give candid, forthright and complete answers to questions from any member of Congress. The Congress is entitled to the advice, assessment, and recommendations of the Chief representing the professionals that make up the Agency. The Administration can justify its actions related to the budget. Then the Congressional committees can do their job with full information at their disposal.
Better budgets aimed to achieve long-term goals and objectives would be the result. The best means of securing such a result would be to assure that the Chief can speak freely, completely, and promptly when asked for information, opinions, and advice. Any constraint on the Chief in this regard deprives the Congress (who also were elected by the people) of information and advice critical to their appropriate deliberations. (Timber Association, Medford, OR - #13658.41200)

Public Concern: The Chief of the Forest Service should be solely responsible for carrying out policy and directing the Forest Service.

The Chief should be solely responsible for carrying out policy and directing activities of the FS. Within legal and policy boundaries, the Chief should be solely responsible for staffing, operations, and results. Micro-management by Administration political appointees is contrary to any set of management principles with which I am aware. (Timber Association, Medford, OR - #13658.41200)

2.2.3 Role of States and Counties

The role of states and counties is a concern for many individuals both in and out of government. Some state elected officials specifically request Cooperating Agency Status. Even respondents who do not make that specific requests do maintain that states and counties should be given greater input and control over management of federal lands. Some go so far as to say national forests should be entirely turned over to states or counties to manage.

Counterbalancing that view is the concern that individual states should not have undue influence. "Please do not be swayed by the perspectives from Idaho; they are not the only ones with areas of National Forest!" remarks one individual. Respondents believe not only that states and counties should have greater input over management, but that other entities should, too. One individual suggests the Forest Service use input from research stations; another suggests an international committee be established to oversee the importation of foreign timber.

Public Concern: The Forest Service should address requests for Cooperating Agency Status.

Perhaps as both you and the President review this information, you will understand why we are concerned that the State of Wyoming's request to be designated a cooperating agency on the roadless initiative, under the directives in the National Environmental Policy Act, may have been denied. I still have not received any formal written indication that our request has indeed been denied, and would request your assistance in stimulating a more positive reply from the Forest Service…I cannot understand how the Forest Service could assert that the State of Wyoming lacks jurisdiction, constitutional primacy, and the professional expertise to be a cooperating agency in this and other NEPA evaluations on issues which affect the State of Wyoming. The Forest Service would certainly benefit from our assistance. (State Elected Official, Cheyenne, WY - #2816.40200)

Chairman [Hayes] Gilstrap [of the Arizona Game and Fish Commission] specifically requested that the Arizona Game and Fish Department be invited to participate fully in the development of the EIS.
I am writing in strong support of Chairman Gilstrap's request and urge you to include the Department as a full participant in the development of the EIS. The Department is a significant source of knowledge and expertise on land use issues in Arizona and the impacts that land use decisions have on wildlife in the state. Because the extremely arid nature of our state and the large amount of Forest Service land set it apart from others, it is vitally important that state experts with first-hand knowledge be allowed to assist in crafting the EIS. (State Elected Official, Phoenix, Arizona - #18119.40200**)**

Cooperating agencies should also include each state government, the State Association of Counties for each western state or, at least, the National Association of Counties. (Mining Association, Reno, NV -#15907.40200)

Public Concern: Individual states and counties should be given greater input and control over forest management on federal lands.

Individual States should have more input and control over usage and management of our forest areas. (Individual, Nezperce, ID - #589.52200)

To ensure appropriate federal-state agency cooperation and wildlife management on USFS lands, the Department [Arizona Game & Fish Dept.] requests specific reference to the jurisdiction of the state wildlife agencies and recognition of the states as full natural resource management partners in the management of USFS lands and resources. (State Agency, Phoenix, AZ - #44003.40200)

My opinion is the Forest Service does a terrible job in managing forests and should be reorganized or removed and have the States manage the land. (Individual, No Address - #477.41200)

Public Concern: National Forest Systems Lands should be turned over to the respective states or counties.

I believe the state property should be decided by the respective state's legislature. (Individual, No Address - #1610.41400)

I am asking my Wyoming congressional members to initiate legislation to place these public land holdings and policies under the responsibility of the individual states. (Individual, Lovell, WY - #2761.41600)

In my opinion, the decision on how to manage these Roadless Areas should be left to the individual states and their respective elected representatives. The current process completely bypasses Congress and our elected officials and is, therefore, not legal. (Individual, Missoula, MT - #1233.41300)

All Forest and BLM lands should be turned over to the states as the constitution requires. (Individual, Wellington, NV - #6075.52200)

The public lands should be turned over [to] the Montana Dept of Lands to be managed. All the moneys received should go to fund state public education, primary, elementary, high school systems. (Individual, Kalispell, MT - #11391.93640)

With the exception of a district (not exceeding ten miles square) for the seat of government, and all places purchased by the consent of the legislature of the States in which the same shall be (purchased) for the erection of FORTS, MAGAZINES, ARSENALS, DOCK-YARDS, AND OTHER NEEDFUL BUILDINGS; render all title to public lands to the States as Constitutionally provided. (Individual, Phoenix, AZ - #1797.41000)

I…feel we should dissolve the Forest Service, and give the forests back to the Counties that they are in, to be managed properly. (Individual, Ironwood, MI - #2903.41600)

Please do not be swayed by the perspectives from Idaho; they are not the only ones with areas of National Forest! (Individual, No Address - #16578.41000)

Public Concern: The Forest Service should use input from research stations and sustainable agriculture policies.

Government agencies do not take advantage of the information initiatives generated by their own agencies. Don't you have the input of your agricultural research stations or your sustainable agriculture policies? (Individual, Greenville, NC - #3170.42000)

Public Concern: An international committee should be established to certify that timber is harvested in an ecologically sound way; the import of non-certified timber should be prohibited.

I would like to see an international committee established to certify timber as being harvested in an ecologically sound way and the import of non-certified timber from foreign countries banned. (Individual, No Address - #1766.93300)

2.2.4 Role of Citizens

Respondents' comments in this section reflect our roots as a democracy and the basic belief that all citizens have a voice. However, the specific role citizens should play in the process depends on the citizen one asks. One view is that our current laws reflect the will of the people and that only a change in law could legitimize the proposed rule. Others ask for more citizen input but fail to specify what that means. Yet others recommend a national vote to let the people decide, while some respondents insist various stakeholders have been ignored.

A number of individuals maintain that the concerns of the majority should take precedence over those of the minority. Paradoxically, respondents for and against the proposed rule refer to polls that claim 'a vast majority' for their point of view. (Many of the sample comments which appear in this discussion reference specific issues that can also be found in other chapters in this summary. They are included here to show the disparity in people's perception of where the majority opinion lies.) Other respondents argue that if the Forest Service is going to make use of polls and surveys, they should use legitimate, objective surveys.

Public Concern: The Forest Service should consider that existing laws reflect the will of the people.

Chief Mike Dombeck in his "The State of the Forest Extending our Land Ethic" address pleads with the public to "engage…make your views known." This is a beautiful plea and indicates how the Chief thinks. The fact is in this Republic called the United States the will of the people is expressed in the laws of our Country. If we do not like the way the laws are written, we should change them, not take public comments and circumvent them. The 360,000 responses to the roadless Area Notice of Intent is about .001% of the population of 275,000,000. This is hardly an indication of the will of the people, even if all the comments supported the same alternative. (Individual, Fairfield Glade, TN - #303.41500)

Public Concern: The Forest Service should consider citizen input when making management decisions.

We the people must have more input into the management of our forests. (Individual, Placerville, CA - #1237.41500)

I wish that the USDA Forest Service would remember that all of us own these forests and should have a say-so in the care of them. (Individual, Kenton, MI - #3570.41500)

These lands belong to the people of the United States and truly to the people of the world! No corporation or bureaucracy has the right to subvert this. (Individual, Reston, VA - #6071.41600)

CONSIDER A NATIONWIDE VOTE

Our nation was built on the premise that its citizens have a voice. In this instance, that voice has been taken away, replaced by an executive order to implement a policy regardless of public opinion. A nationwide vote should take place to let the people decide how the lands on which we pay taxes are managed. (Individual, No Address - #2218.41000)

Will a vote on the rule be considered? (Individual, Pocatello, ID - #2959.44000)

CONSIDER STAKEHOLDER CONCERNS

[The Roadless DEIS] should be withdrawn because it ignores stakeholder concerns. (Timber Company/Association, Winston, OR - #2138.41510)

Public Concern: Some polls indicate a majority of people are fervently against closing public land from wise recreational use.

Public land is owned by the people of the United States. Poll after poll in USA Today show a vast majority of people against closing public land and instead keeping it open for wise recreational use.…Mr. Dombeck, have the courage and integrity to stand up against Clinton and his radical environmentalists. Serve the majority, and keep public land open. (Individual, Little Hocking, OH - #2428.10212)

Public Concern: Some polls indicate most people fervently support protection of roadless areas.

Polls have shown that the vast majority of the American public favors strong, permanent protection for these unroaded areas. The Forest Service needs to start serving the interests of the American public and stop giving in to the private interest groups who seek to exploit our national forests for their own benefit. (Individual, Richland, WA - #1006.41700)

Recent polls have shown strong public support for protection of roadless areas. For example, a Mellman Group poll last summer found that more than 70% of voters favored prohibiting logging, oil drilling, and mining in national forest roadless areas. 75% favored a plan that would not exempt any of the national forests from protection. It's time to put aside the original stated purpose of the National Forest System, and to realize that the public is now demanding a different vision for the land under this jurisdiction. (Individual, Medford, MA - #1331.41200)

THE MAJORITY FAVORS PROTECTION OVER COMMERCIAL USE.

According to a 1995 national poll conducted for the U.S. Forest Service: 65 percent support increased regulation of commercial use of public forests. Some 38 percent strongly agreed. 79 percent agreed that long-term health of public forests should not be compromised by short-term need for natural resources.
Kaset International, which conducted the poll, said "The responses indicate that the overriding concern of United States' residents is maintaining healthy public forests and grasslands," and that most believe that this is "somehow tied to the quality of life in this country. The public does not seem willing to sacrifice the health of the forests in order to produce consumer goods or increase profits to private companies." (Individual, Osburn, ID - #2887.84000)

Destruction by all of the above (roads, logging, ORV, mining…) activities has escalated in recent years, particularly motorized vehicle use. Majority opinion is firmly on the side of wilderness and environmental values over the desecration of the intrusive activities noted above. It is imperative that government agencies respect and respond to the majority values. (Individual, Bozeman, MT - #8395.41500)

Why should a select few be allowed to plunder our remaining National Heritage. Let those select few grow and harvest rather than steal what belongs to the American People. (Individual, Hagerstown, MD - #4124.41720)

Times change and every set of changes has its temporary winners and losers. Open pit mining is no longer ok, and open pit miners are forced to deal with these changes. So be it for the manner in which the timber industry has operated on our national lands. The exploitation of our forests, by the combined forces of industry and paid-for legislators, must be balanced. (Individual, Missoula, MT - #6944.41720)

The Forest Service has not been successful in trying to control these [destructive] forces particularly under Congressional pressures. So now, with the roadless plan, there is a chance to stop this unnecessary forest and biodiversity destruction. Let democracy and the general public prevail instead of minority rule of our national forests. (Individual, Polson, MT - #8681.41720)

Two things have become clear. First, the public supports environmental protection; loves fish and wildlife, etc. and won't tolerate federal agencies charged with conserving resources clearly degrading them. Second, advocates of parks, monuments, Wilderness, and similar designations have argued convincingly that such designations are in the interest of the environment. Do the math. (Individual, No Address - #5137.41000)

Public Concern: The Forest Service should use objective surveys rather than the existing questionable surveys.

In the social and economic factors discussion (DEIS 3-160-209) reference is made to "numerous national surveys" indicating that the majority of Americans support more wilderness, road prohibitions and no additional timber harvest. Of course you can support any action you wish to take with surveys slanted to prove a particular agenda. The Forest Service did not conduct its own objective survey with non-leading questions, using instead existing surveys of questionable applicability. It is difficult to believe that informed Americans would support the positions these surveys portend to indicate. (Individual, Federal Way, WA - #19134.93100)

The Forest Service is fond of saying that management direction is not determined by a voting process, yet this action is predicated on the assumption that the "majority of Americans" want it, based on questionable polls conducted by various special interests. That is indeed no way to manage our national forests. (Individual, Colorado Springs, CO - #59459.41700)

2.2.5 Role of Special Interest Groups

The role of special interest groups concerns many respondents. It is felt that the Forest Service should not allow special interests to unduly influence or appear to influence public land management decisions. Proponents of the proposed rule warn against the influence exerted by corporate interests. As one individual puts it, "The public lands of the West (including roadless national forest lands) belong to ALL the people of the country, not just the people in the nearby rural communities, or within the state. Local timber/livestock/mining interests have had a disproportionate influence, which has hindered the move toward more preservation and recreational use – which the majority of people seem to favor." In this vein, some respondents assert that it represents a conflict of interest for the Forest Service to accept funds from OHV groups. Others maintain that only those concerned about forest health should be allowed to influence policy making. Remarks one individual, "Corporate interests too often pose as local interests and hijack policymaking."

Conversely, opponents of the proposed rule denounce the influence of environmental groups. Indeed, among opponents this is one of the most frequently cited, emotionally charged concerns. Asserts one individual, "Entirely too much attention is being paid to the Sierra Club and other radical environmental groups that even want to tear down the existing infrastructure of our nation. This is not in the interest of the public or even good for the long-term health of the environment." Additionally it is suggested that the proposed rule is the result of environmental attacks on forest policy. As one representative of the timber industry maintains, "This plan is the result of a ruthless attack by the environmental industry on the validity of forest management.

The environmental industry incorrectly believes that a timber sale is a license to do anything in the forest. This is simply not true. Forest management works . . .”

As noted above, this belief that environmental groups are unduly influencing the process is not an isolated sentiment. People genuinely believe they are purposefully left out of the deliberative process in deference to large interest groups (generally, per this argument, environmental groups). Thus many urge the Forest Service to consider the interests of all recreational user groups, “. . .not just environmentalists and federal employees in Washington, D.C.”, including OHV users.

Public Concern: The Forest Service should not allow special interests to unduly influence or appear to influence public land management decisions.

Do not buckle under pressure from industry or its puppets in Congress. Congress has proven itself unable to follow the will of the people over the temptations of $$$ from industry. The agencies appointed to watch over the land of all United States citizens must help counterbalance the greed in Congress. (Individual, Wilson, WY - #16613.41300)

DO NOT ALLOW UNDUE INFLUENCE FROM COMMERCIAL AND EXTRACTIVE INTERESTS

The public lands of the West (including roadless national forest lands) belong to ALL the people of the country, not just the people in the nearby rural communities, or within the state. Local timber/livestock/mining interests have had a disproportionate influence, which has hindered the move toward more preservation and recreational use – which the majority of people seem to favor. (Individual, Boise, ID - #380.91500)

People are getting very discouraged with the current political situation, and creating a plan to “save” our forests through legislative loopholes, waivers, and exemptions for certain well-monied corporate interests will NOT be a step in the right direction. (Individual, Sunnyvale, CA - #3359.41000)

I’m sick of seeing our public lands given to the purpose of profit for corporate entities and the politicians they own!! (Individual, Casselberry, FL - #3072.41700)

Don't cave in to the pressures of the wealthy industrial lobbyists. Our National Forest roadless areas need immediate and lasting protection. (Individual, Somerset, NJ - #3215.41000)

Please don’t be influenced by our politicians who always act in favor of the logging and mining industries. (Individual, Coeur D’Alene, ID - #934.41700)

I am also extremely disappointed to learn that logging (without the use of new roads) will still be allowed on the approximately 60 million acres. This again is an illustration of the U.S. Forest Service bending to the pressures of the logging industry. (Individual, No Address - #2307.41720)

It is my opinion that this approach is either short sighted or deceptive. It appears to camouflage the intent of Forest Service policies that support extensive timber exploitation in yet undisturbed public lands. The proposal claims to protect National Forests by implementing a moratorium on the building of roads within inventoried roadless areas. This policy, however, offers no protection for the forest within roadless areas. (Individual, Arvada, CO - #7516.43000)

The Tongass NF also received the “Golden Fleece” award by Senator Proxmire in 1986 for the classical example of “log rolling” the USFS and Congress [denied] the public, while the lumber companies got all the logs at taxpayers’ expense (in Congressional Record). (Individual, Juneau, AK - #11362.43000)

Considering that both the Winema Forest Service and the developers secretly and knowingly violated two federal laws raises in my opinion the specter of collusion between the Winema Forest Service and Pelican Butte Corp./Jeld-Wen. Why would the Winema Forest Service assist ski area developers to violate environmental laws? Why is the Forest Service aggressively promoting Jeld-Wen's ambitious development schemes? Why have the Winema Forest Service and Jeld-Wen become such cozy bedfellows? (Individual, Klamath Falls, OR - #2741.42000)

DO NOT ACCEPT FUNDS FROM OFF-HIGHWAY VEHICLE GROUPS

My opposition to motor-speed OHVs is based on the following: The USFS should not be receiving funds from OHV offices. This is a conflict of interest. The USFS should be protecting our resources and providing stewardship. To my mind, the USFS credibility in this regard is stretched taut by its relationship with OHV interests. I believe the OHV lobby intimidates the Forest Service and BLM; I know I personally feel intimidated by this strong and vocal lobby. (Individual, Markleeville, CA - #236.41720)

ALLOW ONLY THOSE CONCERNED ABOUT FOREST HEALTH TO INFLUENCE POLICYMAKING

As far as local control, only those genuinely concerned with forest health who enjoy a symbiotic (as opposed to parasitic) relationship with the land (hunters, hikers, conservationists, etc) should have a say. Corporate interests too often pose as local interests and hijack policymaking. (Individual, No Address - #7596.41000)

DO NOT ALLOW UNDUE INFLUENCE FROM ENVIRONMENTAL GROUPS

The U.S. Government needs to continue to improve and add to the infrastructure of this country. Entirely too much attention is being paid to the Sierra Club and other radical environmental groups that even want to tear down the existing infrastructure of our nation. This is not in the interest of the public or even good for the long term health of the environment. (Individual, Fountain Hills, AZ - #950.41700)

Environmental terrorism has no place in the making of public policy. (Individual, Kalispell, MT - #10409.41710)

The roadless area initiative is simply another extension of the radical environmentalist agenda to restore a supposedly pristine state of nature in all public lands, and prohibit any public use other than backpacking…When one attempt fails, they find another attack strategy. The publicly funded organizations like the Forest Service, BLM, State Parks and others seem to provide a compromise in each situation. However, the cumulative net effect of many compromises over a series of years is the reduction of access to the public lands. This is clearly evident in northwest Colorado when looking at the areas open now compared to the late 1970s. (Individual, Craig, CO - #663.41710)

Additionally I believe it would open the door to bizarre interpretations by fringe environmental groups wanting to restrict virtually all human access to our Forests and National Parks. Existing roads and access to trailheads will go unrepaired when these fringe groups threaten to bring suit under their interpretation of this act. (Individual, Fircrest, WA - #7625.41710)

And lawsuits threatened or enjoined by the environmental community or delayed approval of timber sales on state lands for blatant political reasons also devalue our lives and our communities. It has become so bad and so blatant that even environmental activists such as Professor Charles Wilkinson are beginning to wonder if they haven't take the issue of timber harvesting to an extreme with virtually every timber sale being protested. (Individual, Helena, MT - #10866.41710)

This plan is the result of a ruthless attack by the environmental industry on the validity of forest management. The environmental industry incorrectly believes that a timber sale is a license to do anything in the forest. This is simply not true. Forest management works. In a 1968 ceremony, the Forest Service commemorated the two billionth board foot of timber removed from the Black Hills National Forest. The Rapid City Journal noted in its June 23, 1968 edition, with the removal of the two billionth board foot, the Black Hills had produced as much or more wood that there was estimated to have been standing when logging started there in 1899. Today it remains a beautiful forest. This is an incredible testimony to the power of forestry, including road building, to serve the nation's economic interests while conserving its forest resources. Forestry is as powerful today as it was then. (Timber Company or Association, Roseburg, OR - #8293.93300)

Why are you caving in to the "Green Extremists?" (Individual, Powell Butte, OR - #8198.41710)

Without conflict the environmentalists don't rake in contributions. (Individual, Kalispell, MT - #12400.41710)

Public Concern: The Forest Service should consider the interests of those intentionally locked out of the planning process by influential special interests.

I feel that the people that want the public locked out, have had an insiders track during the planning process. Why are they consulted when the rest of us are left out of it. We are only told of public meetings that they have known about months in advance. (Individual, Midvale, UT - #5971.41700)

Public Concern: The Forest Service should consider the interests of all recreational user groups.

I think many of the recreational user groups need to be involved in the next forest plan revision. (Recreational organization, Knoxville, TN - #6914.41730)

Those whose interests [were] in recreation were not even so much as asked their opinion before establishment of the initiative. (Individual, Canon City, CO - #1103.43000)

…the F.S. should begin to have some form of "Public Overview Board" that is made up of local citizens that would give some form of leadership on what roads the public wants open and what direction the F.S. should be going on harvest numbers, areas, and future cutting prospects. The Board should also assist the F.S. in formulating a 10 year or 15 year Plan. This Board should be made of hunters, hikers, fishermen, loggers, etc., not just environmentalists and federal employees in Washington D.C. (Individual, Noxon, MT - #3405.41600)

INCLUDE THE OFF-ROAD VEHICLE COMMUNITY

I am a responsible tax-paying citizen who happens to be an off-road motorcycle enthusiast and I am against a policy that would ban me and the several million other off-road vehicle enthusiasts from using the trails in our beautiful national forests. I believe the off-road vehicle community should have a voice in shaping proposals of land use that works for all users. (Individual, Andover, CT - #933.10212)

Many national and state off-highway recreation organizations have worked hard to promote responsible use of our public lands. Often times these efforts have included collaborative projects with the Forest Service.
When considering changes to any Travel Management Plan, you must include national off-highway groups such as The American Council of Snowmobile Associations, American Motorcyclists Association, Backcountry Horsemen of America, Washington State Snowmobile Association, and the Blue-Ribbon Coalition. In my opinion, without active consultation of these recreational groups, you are violating the public trust in our Forest Service. (Individual, Granite Falls, WA - #9264.72200)

2.2.6 Local versus National Decision-making

The question of whether forest management decisions should be made at the local level or the national level evokes highly polarized responses. In general, those opposed to the rule believe management decisions should be made at the local level, while those in favor believe they should be made at the national level.

The Forest Service has a long history of local involvement through the forest planning process, yet it has always operated under federal legislation. Due to the history and structure of the Forest Service many feel that "land use policies should be made by the local experts and people who use the public land. The local land managers are familiar with the problems, and have solutions tailored to their specific situations." Many of these respondents believe effective collaboration can only be achieved at local levels, where common ground can be identified and workable solutions offered.

Opponents repeatedly point out that local managers are in the best position to create solutions because of their local knowledge of the resources and the community.

Furthermore, while acknowledging that these are national forests for all to use, it is argued that "those who are most affected should have the greatest say. Someone who lives 3000 miles away and will never visit should have less say as to what happens locally." Respondents thus urge the Forest Service to adopt the No Action Alternative in order to ensure continued local control and to allow the implementation of locally developed forest plans. As respondents point out, Forest Service plans developed locally directly address each areas' specific management needs. The Northwest Forest Plan is one such plan that respondents desire implemented. As one individual insists, "After many exhausting years of forest management plan development, you choose to ignore those management plans to implement this flawed proposal. The agriculture and cattle industry is being totally ignored and the 'one-size-fits-all' proposal is nothing but a Washington power play." In addition, individuals, business associations, and timber companies all point out that forest supervisors have the expertise and knowledge to manage roadless areas and should be allowed to do so.

In short, those opposed to the proposed rule believe management decisions should be made locally. They believe that local managers are in the best position to work out wise and workable policies to address conditions specific to their area, and that it is only fair that the people who use the land and are most affected by management decisions governing it should have a say in making them.

Those in favor of the proposed rule see things differently. The vast majority of proponents are absolutely convinced that a national policy is exactly what is needed. Influence from local interests will not, in these individuals' opinion, serve the best interests of the forests. As one individual observes, "Unfortunately the state I consider my home is not environmentally enlightened. Therefore, we need federal initiatives such as ending road construction and logging in the east Texas woods to protect Texas forests from ourselves."

Moreover, some writers believe the Forest Service cannot be trusted to implement real protective measures at the local level. Local managers, these respondents assert, are not likely to be able to withstand pressure from local business interests. As one individual points out, "I support roadless areas in our national forests and question the effectiveness of allowing local managers to determine their future. Though less federal involvement is preferable in other areas, the "quick buck" will often win out when local managers are faced with decisions about recreational access and logging. Protecting what is left of our national heritage not only for humans but also for those species attempting to survive with us, is a job only Federal government can assure."

Respondents also argue that local managers are prone to be sympathetic to local economic needs, and that the promotion system in the Forest Service rewards managers "on the basis of how much logging their districts have done." Respondents claim as well that national direction is needed inasmuch as local planning efforts have failed to resolve these issues.

Not only do proponents believe local managers cannot be trusted to implement the proposed rule, they believe the final rule should prevent local managers from circumventing the intent of the rule. This should be done by providing specific, clear, and concrete criteria for implementation; by setting national policy for OHV use; and by preventing local managers from constructing roads for the purpose of blocking future roadless consideration.

In summary, there is a significant trust issue on both sides of this debate. Those opposed to the proposed rule do not trust the national leadership to be responsive to local needs; those in favor do not trust the local managers to protect the land. While most concerns regarding this issue are thus highly charged, some respondents write simply that clarification is needed on some points related to decision-making. Some assert that it needs to be clearly disclosed that, be it at the local or national level, it is the Forest Service that will be implementing this rule, not some third party entity. In addition, some individuals believe the Forest Service should clarify who is actually in charge at the local level.

Public Concern: Management decisions should be made at the local level.

We particularly object to any NATIONAL DECISION made on road construction and maintenance in these areas. Local managers with local citizen input should make these decisions. (Business/Business Association, Boise, ID - #75.41000)

An important point for the determination of roadless area conservation is to let local managers do the job they were hired to do. It is important to know what the public wants. It is our National lands. Policy should rightly be directed by the public, rather than by the leanings of the executive branch of our government. (Individual, Obrien, OR - #17546.41240)

Land use policies should be made by the local experts and people who use the public land. The local land managers are familiar with the problems, and have solutions tailored to their specific situations. (Individual, Logan, UT - #7174.41240)

I favor fewer roads in the mountains, but I think that local managers should be allowed to manage the land according to the needs of the forest health and the human ecosystem. (Individual, No Address - #7045.41240)

Working on a watershed-by-watershed, forest-by-forest basis, local people can come up with local solutions. The Range Advisory Councils (RAC's) created by BLM have done this in other areas of our state. They have demonstrated that local people can come up with local solutions probably 80% of the time. And the other 20% of the time, responsible public officials should be able to act in a reasoned and responsible manner…. (Individual, Helena, MT - #10866.42000)

Local management is also key to maintaining the health of the national forest lands. Allowing local managers to make decisions concerning activities in their respective regions, such as trail access, hunting, fishing, and fire suppression measures. Who better to determine the needs of the land than the people who live there! (Individual, Arvada, CO - #5669.43000)

Many of the issues that concern us can be managed on a local level. Yes the land is for all to use. But those who are most affected should have the greatest say. Someone who lives 3000 miles away and will never visit should have less say as to what happens locally. (Individual, Ephraim, UT - #1511.41510)

We acknowledge the need for sensible rules to protect pockets of rare plants, archeological sites, some wild caves, wildlife winter ranges, some stands of old-growth timber, and fragile habitats. We prefer that these protections be administered locally, on limited tracts of land, seasonally, or on a case-by-case basis. Local Black Hills National Forest decisions regarding resource management have generally been sensitive, wise and prudent. Broad wilderness or roadless empowerment, on the other hand, is often oppressive. The conflicts seem to occur when federal standards for managing "big mountains" are imposed upon the little mountains of the Black Hills. One size does not fit all. (Individual, No Address - #7865.41600)

If this proposal is adopted, the Clinton Administration will have been successful one more time in driving a wedge between urban and rural America in order to leave a "legacy." It is unfair to rural America to make them have to carry the burden of this legacy. I urge that this proposal not be adopted and that the Administration work with Congress and local governments to develop responsible management policies. This top-down, elitist proposal is bad policy, and bad government. (Individual, Salt Lake City, UT - #6753.41000)

We were told too that decisions are made at the local level and we would like that same assurance from the Deschutes National Forest. (Individual, La Pine, OR - #6739.41240)

Local level forest planning has worked in developing forest plan decisions by the people most knowledgeable about the forest lands. The proposed one size fits all proposal undermines the cooperative dialogue that takes place during each forest plans revision and cancels out years of hard work and studies. (Individual, Indian Mound, TN - #6353.41200)

ADOPT THE NO ACTION ALTERNATIVE TO ENSURE CONTINUED LOCAL CONTROL

We request that you adopt Alternative 1, no action, no prohibitions and Alternative A, no action, no procedures. These alternatives allow for local flexibility and planning in response to local conditions, to decision making by those most knowledgeable about local conditions and needs, and provides the greatest opportunity for local cooperation and collaboration. They allow for conformance with existing and revised forest management plans which have been developed after much work, study, and money spent and with local input. And they allow for conformance with federally mandated multiple use/sustained yield act and the National Forest Management Act. (Individual, Markleeville, CA - #13284.61100)

Our group favors alternative 1, with the addition of having local people, citizens, along with the local Forest Service personnel form partnerships to determine roads needed or not needed on a local basis. This blanket across the nation, CLINTONIAN dictatorial approach, is not what will in the long run be wise management of the land. Management at the local level through collaboration seems a wiser approach. (Grazing Organization, Amindon, ND - #8122.41240)

As I study the alternatives proposed in the Draft EIS for Roadless Conservation, the glaring question that comes to mind is why is the F.S. arbitrarily tying the hands of the forest planning? Don't you believe they have the ability to recognize, on the ground, where environmentally sound roads can be built when needed to manage the forest? (Individual, Fairfield, Glade, TN - #303.41200)

[PVOA supports] PROHIBITION ALTERNATIVE #1. Many groups and individuals have participated in the existent planning processes in good faith. Despite assertions to the contrary, the proposed rule will in fact override land use designations that have emerged from those processes. It should be noted that the general public (nation-wide) presently has opportunity to participate in existent planning processes. (Business/Business Association, Petersburg, FL - #7542.44000)

IMPLEMENT EXISTING LOCALLY DEVELOPED FOREST PLANS

After many exhausting years of forest management plan development, you choose to ignore those management plans to implement this flawed proposal. The agriculture and cattle industry is being totally ignored and the "one-size fits all" proposal is nothing but a Washington power play. (Individual, Redding, CA - #1118.44300)

I believe the Forest Service has done an excellent job in managing the forests on a local level. I do not believe that a Washington based, one-size-fits-all national policy is in the best interests of our forests or for the people who use them. (Individual, Westboro, MA - #331.41200)

Extensive planning has already been accomplished for these Alaska Forests and many millions of dollars and countless man hours of volunteer participation to craft the compromises reached in the existing planning documents. To disregard the work accomplished which was done with National interests as well as the various aspects of State and Local interests is an insult to the people that took their valuable time to help craft planning documents that would obtain the best utilization compromise for the hotly contested resources of the Tongass National Forest. (Individual, Wrangell, AK - #1042.44300)

I am against the current hurry up method that is being used to shut down access to our national forests. Each forest has its own master plan, why can't each forest develop over a longer and more thorough time frame their own plan, based on the needs and historical usage of the area. (Individual, No Address - 2256.44300)

The theory behind roadless values may be sound, but there are serious problems in the practical implementation of this proposed rule. Many of these problems could be alleviated in our area if the Forest Service could return to a consistent and funded implementation of the Northwest Forest Plan. (County Elected Official, Yreka, CA - #13551.64251)

FOREST SUPERVISORS SHOULD MANAGE ROADLESS AREAS

. . . the Idaho Farm Bureau Federation believes the local Forest Supervisors of the USFS have the knowledge and expertise to manage the National Forests in Idaho. This state does not need a top down management scheme imposed upon them to try to further some political agenda that has nothing to do with forestry management. (Business Association, Boise, ID - #6472.41240)

The details of these proposed rules are identified in the Federal Register, Volume 65, Number 43, pages 11676 - 11693. These proposed rules specifically prescribe the management of inventoried and uninventoried roadless and unroaded areas. Such rules will severely limit local forest supervisors in applying necessary resource management actions. (Timber Company, Libby, MT - #6709.412409)

My desire is for the Roadless Areas of Montana to be returned to the management of the U.S. Forest Service, and that they, in consultation with the local communities, decide what to do with areas in the next round of individual Forest Plans. Any intrusion of the Washington Establishment in this process is unacceptable. (Individual, Missoula, MT - #1233.41240)

Public Concern: Management decisions should be made at the national level.

Unfortunately the state I consider my home is not environmentally enlightened. Therefore, we need federal initiatives such as ending road construction and logging in the east Texas woods to protect Texas forests from ourselves. (Individual, Houston, TX - #7574.41000)

FOREST SERVICE CANNOT BE TRUSTED TO IMPLEMENT LOCALLY

If on the ground monitoring is any indication, the U.S. Forest Service cannot be trusted to implement scientific based conservation measures without national guidance. (Wise Use Organization, Clarion, PA - #8414.42000)

I support roadless areas in our national forests and question the effectiveness of allowing local managers to determine their future. Though less federal involvement is preferable in other areas, the "quick buck" will often win out when local managers are faced with decisions about recreational access and logging. Protecting what is left of our national heritage not only for humans but for those species attempting to survive with us, is a job only Federal government can assure. (Individual, Hammondsport, NY - #3558.41000)

The Washington Office of the Forest Service should establish direction, regarding protecting desirable characteristics in inventoried roadless areas and other roadless areas, for the wildlife species that inhabit the area. This decision is too important to leave to the whim of each local manager and to the influence that local communities could have on the decision of the local manager. Past experience has proven that left to the local managers, there will be loss of wildlife habitat, decline in wildlife species populations, and loss of the fire prevention characteristics of the forest. (Environmental/Preservation Organization or Association, Weldon, CA - #16041.41200)

I do not believe that the proposal goes far enough in preserving national forests. It has several flaws, among which are: REGIONAL FS MANAGERS MAKING THE JUDGMENT CALLS--this would be problematic. In the past, when regional managers have been allowed to do this, the local business interests (logging, mining, cattle--whatever the business) have been able to exert local political and economic arm twisting. Because they can do this, they basically get a free ride on the public land. Local FS Managers are more susceptible to this than a national policy would be. (Individual, Seattle, WA - #2203.41200)

Do not let local forest supervisors set any rules. Many of them are from logging families and therefore they are supportive of logging. Most of them live in small towns and naturally are sympathetic to their local friends in setting quotas, etc. Of course they will be influenced by friends at coffee or church. What supervisor from a little town like Powers, Oregon could stand up to locals who need jobs? But national forests are not his forests. They do not belong to locals either. They belong to us all. (Individual, Bandon, OR - #2910.41200)

I am also extremely skeptical about involving local forest managers in deciding which areas should be protected as they have generally been promoted solely on the basis of how much logging their districts have done. (Individual, Port Angeles, WA - #7950.42000)

The four Procedural Alternatives are flawed because they all leave the future management of roadless areas in the hands of local Forest Service Administrators. This simply leaves the door open for confusion and mismanagement. What administrators need is a uniform set of guidelines with clear, strong protections for roadless areas. (Individual, Portland, OR - #11425.41240)

Leaving that decision up to a local Tongass Ranger does not make sense as we get a new one about every three to five years and they do not know the local people. By the time they (new rangers) acquire some of this knowledge they get transferred and the people suffer from activity [which] is easily construed to [be] a "rebuilding" activity which is prohibited. (Tribal, Ketchikan, AK - #13987.41240)

LOCAL PLANNING EFFORTS HAVE FAILED TO RESOLVE ISSUES

I also want to commend the Forest Service for the process being followed. These are NATIONAL Forests. The process being used recognizes that by focusing national attention on this issue. We have tried for more than 2 decades to resolve the roadless issue on a Forest-by-Forest basis through the Forest Planning Process. THAT EFFORT HAS BEEN A FAILURE. (Individual, Missoula, MT - #9393.44300)

Public Concern: The final rule should prevent local decision makers from circumventing the intent of the rule.

Leaving future designation and management rules entirely up to the discretion of local officers means that as Supervisors or District Rangers come and go, subject to local pressures and situations, the long-term stewardship mission may not be adhered to. (Individual, Springville, CA - #8040.41240)

The four Procedural Alternatives are flawed because they all leave the future management of roadless areas in the hands of local Forest Service Administrators. This simply leaves the door open for confusion and mismanagement. What administrators need is a uniform set of guidelines with clear, strong protections for roadless areas. (Individual, Portland, OR - #11425.41240)

BY PROVIDING SPECIFIC, CLEAR, AND CONCRETE CRITERIA FOR IMPLEMENTATION

The preferred alternative stipulates that the decision to change a forest plan designation would be in the hands of the local manager. At present, there is no clear-cut criterion by which the size of a parcel (or any other specific issue) can be understood as to the reasoning by which an area of land meets the Unroaded Classification. WE REQUEST THAT BEFORE ANY AUTHORITY IS GIVEN TO THE LOCAL MANAGERS TO APPROVE UNROADED CLASSIFICATION FOR ANY AREA THAT SPECIFIC, CLEAR AND CONCRETE CRITERIA ARE LISTED BY WHICH THE GNERAL PUBLIC WILL HAVE THE UNDERSTANDING OF WHAT IS BEING DECIDED, AND WHY. The less the subjective content of the issues being considered the better for all to understand the reasons. While we appreciate the fact that the decision making body will be local rather than dictated from Washington, too many questions remain unanswered. (Individual, Lake Tahoe, CA - #2113.64251)

BY DETERMINING OFF-ROAD VEHICLE USE

The draft EIS leaves decision making about ORV and snowmobile use to the discretion of individual forest plans. These uses are growing so rapidly and have such a strong and financially well-supported constituency that I am afraid they already have and will in the future be the predominant use of Forest Service lands. (Individual, Provo, UT - #8058.41700)

BY PREVENTING LOCAL MANAGERS FROM CONSTRUCTING ROADS FOR THE PURPOSE OF BLOCKING FUTURE ROADLESS CONSIDERATION

[T]he local decision-makers are uniquely hostile to protecting wild areas and are no more likely to support protecting roadless areas in four years' time; and, given their disposition, it is probable that the ensuing four years will be a race to road as many roadless areas as possible to prevent their consideration for future protection. (Individual, Seattle, WA - #10687.41000)

Public Concern: The proposed rule should clearly disclose that the Forest Service would be the ultimate decision maker.

FS is developing a framework for the local/regional FS offices to use in adopting multiple use plans for national forests. The fact that it is a local office of FS versus the national office of FS is inconsequential. In either event, FS will implement the rule, not a third party entity. Regardless of where the office is located, FS is making the ultimate decision of whether a road will or will not be constructed. The proposed rule clearly states that roads may not be constructed or reconstructed in the unroaded portions of inventoried areas of the National Forest System unless the road is needed for public safety, for environmental response or restoration, for outstanding rights or interests protected by statute or treaty, or to prevent irreparable resource damage. (Federal Agency, Washington, D.C. - #54012.41200)

There is further element of confusion and…inconsistency as to which responsible official is going to make the decision for the document. At the public scoping sessions, the Forest Service spokesperson identified the Secretary of Agriculture as the responsible person and the individual making the decision, but in the DEIS, the Chief is identified as the responsible official. Even as recently as this week on July 14, 2000, FS officials were identifying the Secretary as the responsible official is, it is difficult for the readers of the DEIS (the public) to comprehend or determine who is making the decision and what the appeal process, if there is one, will be. (Business/Business Association, Mammoth Lakes, CA - #44001.41000)

THE FOREST SERVICE SHOULD CLARIFY WHO IS IN CHARGE AT THE LOCAL LEVEL

With regard to this quote from your website: "overall, decisions about recreational activities…on National Forest System lands would continue to be made at the local level with full public participation." Can you please tell me who is in charge at the "local level," and how I will be able to participate in the decision making? (Individual, San Diego, CA - #97.44240)

2.3 Issues of Trust and Integrity

Throughout the hundreds of thousands of comments submitted on the proposed rule, concerns surrounding trust and integrity are among the most pervasive--expressed both implicitly and explicitly. Some respondents explicitly express their appreciation to the President for initiating this process and to the Forest Service, both for following through on the President's mandate (albeit most believe the Forest Service has not gone far enough), and for the efforts the agency has made to involve the public. Many of the letters in support of roadless protection can be interpreted to implicitly trust the Forest Service and the rulemaking process. However, the vast majority of explicit expressions of sentiment on these issues comes from opponents of the proposed rule. These respondents express grave distrust over the integrity of the process, the forthrightness of the agency, and the motivations of the President.

Some respondents argue that the implementation of the proposed rule would only cause greater controversy and more appeals and lawsuits than present management evokes. Others claim that the release of so many initiatives in such a short time "serves only to confuse and frustrate the American public," and that "this confusion was purposely orchestrated to further dissuade the American public from meaningful participation."

It is mentioned again and again that politics has no place in public land management. Individuals, recreation organizations, and businesses see one or all aspects of the proposed rule as circumventing the established planning process. One individual requests a list of lobbyists and legislators who have contacted the Forest Service, saying the list is wanted "just so we'll know who bought our forests cheaply." Some proponents of the proposed rule assert that the exemption of the Tongass National Forest is politically motivated. As one respondent protests, "What sounds like a compromise, i.e. we are not really leaving the Tongass out we are just going to look at it in a different time frame, is in fact a political expediency to placate the special interests concerned with logging in the Tongass."

Respondents also write about other agencies. One individual asserts the Fish and Wildlife Service and the Forest Service need to be completely overhauled. "Maybe if we got rid of about half the people in both of these agencies," this individual claims, "starting from the top down, things would change, and you all would listen to some of us, and not just the one side." Some people also demand a complete investigation of the rulemaking process for developing this proposal be initiated, and that the whole process be stopped until said investigation has been completed. Finally, some respondents complain about both the behavior and public pronouncements of some Forest Service employees, and believe the Forest Service should take action.

Concerns regarding Misleading Information or Non-Disclosure are covered in Section 2.3.1, and concerns regarding the Use of Best Science and Assumptions are addressed in Section 2.3.2.

Public Concern: The Forest Service should realize the implementation of the proposed rule would cause controversy, appeals, and lawsuits.

According to your agency: Activities in roadless areas that alter roadless characteristics create public controversy, appeals, and lawsuits. (Individual, Moretown, VT - #7156.41000)

The roadless area plan in conjunction with the destruction of the dams, as well as recent EPA edicts, is a concerted effort by a group of elitists to control the populace for their own selfish purposes. History reveals it has happened before and will continue, until the elitists overreach and the populace rebels in some fashion. (Individual, Idaho Falls, OR - #7108.41710)

Stop the green curtain before it divides the country into loyal subjects and outlaws. (Individual, Medford, OR - #8197.41710)

Our Government has become so high handed in its policies, many are talking lawsuit or worse in rural areas. I write this as a concerned voter and leader. (Individual, Austin, NV - #6414.42000)

One of the stated objectives is to cut down on litigation. The proposed rules will not prevent the radical environmentalists from continuing to sue. Alternative B opens the door to additional suits by opening the possibility of including areas under 5000 acres. They will continue to pressure the Forest Service to close off all road access to the “roadless” areas. (Individual, Elko, NV - #8087.64220)

Public Concern: The Forest Service should not purposely cause confusion by separately releasing several documents that are inherently integrated.

As you are aware, it is impossible to adequately address the DEIS without simultaneously scrutinizing the many thousands of pages contained in the proposed National Forest Management Planning Rule (PR), and the Proposed Road Management Rule and Policy (ROAD RULE). The release and consideration of all of these proposals at generally the same time serves only to confuse and frustrate the American public, and discourages their participation. In light of the facts which were uncovered during the inquiry conducted by Natural Resources Committee this past spring, I believe this confusion was purposely orchestrated to further dissuade the American public from meaningful participation. Until the PR and the Road Rule are thoroughly studied, adopted and implemented, the Roadless Rule has no real relevance; it can not and should not be construed as a stand alone document. The principles underlying each of these documents are inherently integrated and must be considered as such. (Individual, Coalinga, CA - #6446.72200)

Public Concern: Public land management should not be politically motivated.

President Clinton’s so-called roadless area initiative is a big waste of federal money and staff time, and a purely political attempt to circumvent the established planning process. Our forests should be managed by professional scientists, not politicians. (Individual, Gainesville, GA - #2155.41200)

PVOA supports PROHIBITION ALTERNATIVE #1: The use of a proposed rule to supersede existent planning processes sets a precedent of management based on political climate. Hopefully, forest management science will continue to evolve, improve, and change. Political climates are known to change much more rapidly but without consistency of direction. (Business/Business Association, Petersburg, AK - #7542.41000)

The Forest Service roadless proposal is a mockery of public trust. (Individual, Emerson, KY - #11238.42000)

It is no longer appropriate or conscionable to allow politics or vested interests to adversely affect the absolute protection of our forests/wild lands. (Individual, Arden, NC - #3040.41000)

This is another attempt to create political gain by presidential decree, bypassing scientific investigation, congressional due process and professional forestry. (Individual, Fall City, MN - #10560.41100)

The future of our nation's land is too important to be decided without sufficient public input and careful consideration of a long-term strategic approach to managing these resources. Lets focus on what's right for the future of our forests, and not just political policy right now. (Individual, Oroville, CA - #2846.44400)

In addition, we believe this "fast track" plan is designed to be implemented before the November elections and we're appalled that the future of our wild lands is being used as a political pawn. (Recreational organization, Redding, CA - #7388.44420)

This is a terrible--after the fact--attempt to justify a pre-selected course of action. Manage forests with real science NOT political science. (Individual, Troy, MT - #1294.43000)

You have gone to great lengths to show how unbiased you are by having multiple dog and pony shows all over the country on the issue. You say you really want to gather public opinion and do what the public wants. You say your minds are NOT MADE UP but it appears to me your MINDS ARE CLOSED.
Why would I think this? Well as far as I have learned, which is difficult given the time and scope of the project, your proposal still allows logging in roadless areas. But now Al Gore comes out and says that when he is elected president there will be no logging in roadless areas. This whole process makes us sick from the beginning and you just keep on showing your true colors. Are we really supposed to think for one second that this is anything but a big political sham to get Clinton some good press and let Gore be a big hero? (Business/Business Association, Portland, OR - #2413.43000)

I do not believe you will do the right thing. I think the decision has already been made to close and shut it down. You are public servants, and you act like prison guards. (Individual, Colorado Springs, CO - #8432.42000)

This is merely the latest in a series of Clinton political initiatives designed to boost Vice President Gore's reelection prospects. I suppose no one should be surprised at the politicization of the U.S. Forest Service. After all, this Administration has used every federal agency from the IRS to the FBI to pursue its political agenda. (Individual, No Address - #2236.41100)

I suspect that the draft rules read as they do from some intense lobbying efforts by special interests. In the interest of fair and open government, perhaps a list of those lobbyists and legislators contacting the Forest Service on this issue should be appended to the final document, just so we'll all know who bought our forest cheaply. (Individual, Roswell, NM - #5106.41000)

I would like to see the Forest Service, and the Fish and Wildlife Service completely overhauled; maybe if we got rid of about half the people in both of these agencies, starting from the top down, things would change, and you all would listen to some of us, and not just the one side. It's too bad we can't work together on these problems, and all be able to enjoy our forest. But you and Mr. Babbitt, have made your choice, and for that I am sorry. (Individual, Eager, AZ - #6625.41000)

In trying to understand the degree of objectivity of the creators of this initiative, I looked at the employment history of the 23 members of the several committees. 21 of the 23 are current FS employees with an average of 19.76 years of FS employment! What that says to me is that these long-term employees began their FS work under management and policies that strongly pushed "get out the cut," and that outmoded policy is still, unfortunately, excessively rampant in the FS. (Individual, Spokane, WA - #4546.42000)

Please conduct a full public audit of the Forest Service. (Individual, Santa Barbara, CA - #17810.42000)

THE TONGASS NATIONAL FOREST EXEMPTION IS POLITICALLY MOTIVATED

What sounds like a compromise, i.e. we are not really leaving the Tongass out we are just going to look at it in a different time frame, is in fact a political expediency to placate the special interests concerned with logging in the Tongass. (Individual, Tenakee Springs, AK - #8123.41720)

I am outraged that the Tongass NF roadless areas will not be protected under President Clinton's latest proposal. Actually I believe that this decision was made by the Forest Service in collusion with the timber industry and its paid puppets, the Alaska Congressional Delegation. There exists 4650 miles of permanent logging roads on the Tongass which readily access billions of board feet of timber that was bypassed under the now defunct 50 year timber contracts (KPCEAPC). (Individual, Sitka, AK - #883.41720)

THE PUBLIC INPUT PROCESS IS A MEANS TO HIDE THE POLITICAL USE OF THIS INITIATIVE

I believe that this public input process is nothing more than a façade to hide President Clinton's attempts to build a favorable legacy. (Individual, No Address - #207.41100)

Public Concern: The Forest Service should delay the proposed rule until Congress completes its investigation of improprieties in developing the rule.

The entire roadless area conservation proposal needs to be stopped in its tracks until the committee on Resources-subcommittee on forests and forest health completes its investigation on the overwhelming improprieties that transpired in developing such a proposal. (Recreation Organization, Coalville, UT – #14657.72200)

In view of recent serious Congressional resource Committee and Subcommittee hearings, the matter of undue influence, potential violations of RICO, Sherman Antitrust, Foreign corrupt Practices and other Acts, and agency membership in the IUCN (which requires "non-conflict" with mandates not approved by Congress) is a reasonable concern with regard to motivation for this proposal (Business/Business Association, No Address - #54308.50000)

Public Concern: The Forest Service should instruct its agency employees to speak with sensitivity and forthrightness.

In a recent Associated Press story, the Forest Service is quoted as saying "this looks like a blatant red herring because what we are working on will not close a single road--not a single mile of road." I urge you to instruct your Agency spokesperson to speak with more sensitivity and forthrightness. I am personally offended by the name-calling reverted to in the AP story. Disabled Americans are not red herrings. (Local Community/Civic Organization, Washington, DC - #1663.42100)

When I was younger, it was always a pleasure to happen across a Ranger. They were always warm and friendly and seemed like people you'd like to know and have around. These days, US Forest Rangers seem to have an attitude problem. They are often rude, terse, arrogant, and overbearing to begin with. I once worked with a fellow who was like that. He wanted to be in a position of power so bad he applied to attend the California Highway Patrol Academy. I once told him, "Why bother, they won't take you!" He did graduate, but the CHP refused to hire him because of his attitude. I now ask you, "Is the US Forest Service hiring rejected Law Enforcement Academy graduates?" (Individual, Bishop, CA - #11278.42000)

2.3.1 Misleading Information or Non-Disclosure

A more specific issue directly related to trust and integrity is the allegation made that the Forest Service and administration are deliberately misleading the American public. As noted in a number of places throughout this summary, respondents question the data provided in the Draft EIS. Some believe the agency is disseminating "false reports that forests have regrown when they are hardly (if at all) replanted." Others are incredulous at the claim that access will not be affected and believe this is the first step to closing average citizens out of the forests. One individual claims the public has been misled about mineral potential contained in RARE II inventories. Finally, respondents express a wide array of suspicions about possible hidden agendas.

In addition, respondents charge the Forest Service is misleading the public by including alternatives that would sanction uneconomical and inefficient commercial timber harvest. Says one individual, "You permit further commercial timbering, yet make it essentially uneconomic….This seems a little devious, don't you think?" On the other hand, others ask whether the real goal of this proposed rule is to save ecosystems or to appease environmentalists while continuing to allow destructive activities. Another respondent asks whether the real goal is to ensure the closure of roads by eliminating records and changing definitions. Many suggest the real goal is to bypass Congress in establishing de facto wilderness areas. Likewise, many believe the real goal of this and other recent initiatives is to lock the public out of public lands. Finally, some suggest the Forest Service is in collusion with the United Nations to covertly implement international agreements with no regard for local needs and concerns.

Public Concern: The Forest Service should not disseminate false reports that forests have regrown when they are hardly replanted.

No new roads on any public forest land. No more vehicular use of roadless areas. No more false reports that forests have regrown when they are hardly (if at all) replanted. We are so close to having cut ALL forests that we will soon need to get by on only regrowth anyway. Let's preserve the few remaining natural areas while we can. (Individual, San Diego, CA - #4190.10110)

Public Concern: The Forest Service should not mislead the public about which roads and trails would be closed as a result of this rule.

Based on what I have learned from local land managers (e.g.…Carson City Forest Office) your statement in your May 2000 correspondence entitled "Roadless - What's it about" is MISLEADING. Therein you write "No roads or trails will be closed." It is my understanding that [the] Forest Service has wide discretion in recognizing a road or trail as such. Perhaps no "recognized" road or trail may be closed. However, I believe that many roads or trails will be closed because [the] Forest Service has not inventoried them as roads. You deem a plain and obvious road or trail, as not existing. (Individual, Carson City, NV - #703.32000)

Public Concern: The Forest Service should not mislead the public about the effects of the proposed rule by ignoring RARE II information about mineral potential.

The 1982 GAO report made this significant recommendation to Congress that is appropriate to today's situation: “In light of the high percentage of RARE II areas with unknown mineral potential (up to 85 percent) which the Forest Service recommended for wilderness in five Western States we reviewed, we believe that your Committee--since potential mineral conflicts are important in the wilderness decision making process—should hold off any decision until the Department of Agriculture provides you with corrected data showing the true extent of its mineral knowledge of possible wilderness areas under its jurisdiction.” [Page 11.] In today's case, the Forest Service has ignored almost the entire knowledge base of mineral potential developed during and since the RARE II effort. It has done this, in my view, to mislead the American public and the Congress about the true effects of the proposal, and because the current Administration is not concerned about the economic effects on the minerals industry and the American people as a result of implementation of the proposal. (Individual, Purcellville, VA - #15876.42000)

Public Concern: The Forest Service should not mislead the public by including alternatives that would sanction uneconomical and inefficient commercial timber harvest.

Your alternatives address the continuation of timber harvest in roadless areas. Your preference for continuing harvest, albeit without roads, is puzzling, particularly in light of your stating that roads are by and large essential to harvest operations. You permit further commercial timbering, yet make it essentially uneconomic. Or if lumber prices take a turn upward, you leave the door open to the less efficient if less damaging removal by hi-lead or helicopter. This seems a little devious, don't you think? (Individual, Camp Sherman, OR - #61000.93300)

Public Concern: The Forest Service should disclose whether the real goal of this proposed rule is to save ecosystems or to appease environmentalists while continuing to allow destructive activities.

The prohibition of roadways in our national forests won’t solve any problems or save any forests. Loggers will still be able to log by means of cable technology, helicopters and other new techniques which you can guarantee will be developed as a direct result of this law. Without any specific protection against logging the loggers will reach our untouched timber and go away unpunished. Was the goal of this law to save what few existing ecosystems we have left or was it to pass a weak law to temporarily appease environmentalists but at the same time allow the destruction to continue on the very thing that makes our nation successful? (Individual, No Address - #2329.43000)

Public Concern: The Forest Service should disclose whether the real goal of this proposed rule is simply an attempt to extort additional road maintenance money from Congress.

This appears to be a not so subtle attempt to extort additional road maintenance money from Congress. Consciously engaging in high stakes poker and playing the “no road building” card limits your management capability and jeopardizes the health and public enjoyment of 54 million acres of roadless NFS lands. This is not professional resource management based on science. Rather, it is resource management based on political blackmail. (Individual, Boise, ID - #1044.41000)

As a taxpayer, I oppose spending more money to maintain logging roads for timber companies. This is PUBLIC land, not private company land. (Individual, Great Falls, MT - #6046.41720)

Public Concern: The Forest Service should disclose whether the real goal of this proposed rule is to ensure the closure of roads by eliminating records and changing definitions.

I believe that many of these supposed "roadless areas" actually have roads, but these roads have been conveniently eliminated from your inventory list so you can permanently close these areas. I have been on hundreds of roads in National Forests that do not appear on Forest Service maps. (Individual, No Address - #10857.82000)

What is directly said isn't bad, but I have concerns about the strict definitions listed in your Glossary and how they could be interpreted in the future. Our fear is that someone, using your exact definition for a "Classified Road" would force broad closures of any roads not "classified." The vast majority of roads in Nevada would fall into that category. (Individual, Ely, NV - #10563.32100)

As an outdoorsman and long time Idaho resident, I am deeply troubled by the Forest Service's proposed set of rules regulating roadless areas. These proposed rules redefine many existing recreational roads and trails as "unclassified" roads. This means that such areas can be designated as roadless, and that many public campgrounds and other recreational related facilities accessible by these unclassified roads will suddenly become roadless areas. (Individual, Boise, ID - #6948.32100)

The part of the plan that also defines a road and the maintenance allowed on these existing roads (or non-roads) also concerns me. Many current recreational opportunities in the State rely on these access trails (or roads) to be utilized. When these fall out of maintenance, I can only assume that the supported trails will also be closed. (Individual, Kent, WA - #6329.32100)

By looking at your map on roadless areas on the national forest some of the areas do have roads already there. They were put in, many years ago…So now they are two track roads what you call unclassified roads. I'm afraid you are going to close these types of roads, because you say they [are] not there by the map. (Individual, Dillon, MT - #7378.32100)

Public Concern: The Forest Service should disclose whether the real goal of this proposed rule is to bypass Congress and establish de facto wilderness areas.

The executive order handed down by Commander in Chief Clinton to USFS creates a DEFACTO wilderness. This is something only Congress is empowered to do under current law. The "Roadless Area Conservation Proposed Rule" should not be considered without congressional approval. (Individual, Carson City, NV - #669.41000)

This is the most blatant attempt by the Administration to circumvent congress and establish de facto wilderness totally without congressional approval. (Individual, Glide, OR - #749.41000)

Section 24 of the Forest Reserve Act of 1891 was illegally adopted by a House-Senate Conference Committee. Therefore the USFS LACKS CONSTITUTIONAL JURISDICTION over these lands. USDA lacks jurisdiction for this decision because the effect of the policy is to convert the use of the land from "multiple use" to a singe use: wilderness. The USDA FS has the agency mission of managing our NFS, not changing their use. This is a violation of statute and is unconstitutional exercise of Administrative Law. Congress is the only lawmaking body with the authority to declare public lands "wilderness."
Alternatives B, C, and D effectively imply de facto wilderness classification. Such classification is a legislative prerogative with Executive concurrence and should not usurp Congressional powers. Wilderness classification should be considered on a case by case basis. Not by blanket designation. (Individual, Pueblo, CO - #2884.41000)

I believe that the true purpose of this proposal is to create mini wilderness areas. If this proposal represented the true feelings of a majority of citizens, it would not be necessary to achieve your goal with slight of hand and deception. (Individual, Sumpter, OR - #2735.43000)

The proposed rule is overly broad, does not allow for public inputs on a case-by-case basis, and amounts to a declaration of wilderness areas without Congressional Approval. (Recreation organization, Whitehall, MT - #4658.41000)

On the surface it would seem appealing to some people to not have "roads" running through forests. But, by defining any path wider than 50" a "road" and then saying that none can be built or even maintained, a clearer agenda seems to emerge. In order for lands to be designated "Wilderness" (the most restrictive designation public land can receive in regard to access by humans that choose to use anything other than their feet to do so) the land in question cannot, by law, have roads. By not constructing any path wider than 50" on any Forest land and not even allowing maintenance of existing paths wider than 50" (a.k.a. "roads"), it would appear that the long term goal of the Forest Service (and of the outgoing Clinton administration, along with Candidate Gore) is for a vast increase in the amount of future designated Wilderness Areas. (Individual, Prospect, KY - #6286.43000)

Public Concern: The Forest Service should disclose whether the real goal of this and recent rulemakings is to lock out the public from public lands.

The Roadless Rule is only one part of a three part rulemaking process designed to lock the public out of the public land. (Individual, Lake Havasu City, AZ - #2752.42000)

I…believe that this is just the first step by the "elite" to deny all access to the forests. They are doing this movement in phases. Phase One: No more road building. Phase Two: Redefine what a road is, thereby only "maintaining" roads which are approved for travel. Phase Three: After several years the unapproved roads will disappear (by closure and without maintenance), and presto! You now have a wilderness area where there wasn't one before. Now the elite have their very own campground to themselves. (Individual, Las Vegas, NV - #3223.43000)

How can you honestly believe that the public cannot see that your proposed rule is not a stand alone document? That it is, in fact, simply a part of the Clinton/Gore agenda designed to keep the public off of the land that belongs to us? (Recreational Organization, ID - #3292.43000)

I will start by saying I would have no problem with putting these now unroaded lands into "roadless" designation if it would stop there, but we all know it won't. I can see more and more money pumped into decommissioning of existing roads that will then become "roadless" areas to be included into this "land grab" for the extreme environmentalists/wilderness activists. (Individual, Libby, MT - #10758.43000)

A careful reading of the SDEIS for the ICBEMP…leads me to believe that you plan to eliminate people from rural areas here in the West. If your roadless plan is an extension of that fallacious policy I want to know about that. (Individual, Albany, OR - #5675.43000)

Public Concern: The Forest Service should disclose whether the proposed rule is intended to help the Forest Service comply with commitments made to the International Union for the Conservation of Nature and Natural Resources.

The proposed rule and the companion actions are a small portion of the agency's endeavor to meet its international commitments to implement and enforce several Treaties and international agreements, including but not limited to, the Convention on Trade In Endangered Species (CITES), the Convention on Biological Diversity (CBD), and its implementing plan "Agenda 21." (USDA-Forest Service Long Term Strategic Plan) The agency is covertly implementing the international agreements, plans, programs and projects in order to achieve the United Nations policies and definitions of "sustainable development." These commitments and efforts in resource manipulation and social engineering are not disclosed in the intent of agency personnel and its international partners to override the powers vested in the duly elected Congress and the powers specifically reserved to the several States and to the people. The International Union For The Conservation Of Nature And Natural Resources (IUNC), a foreign

international organization, drafted both the Convention on Biological Diversity and Agenda 21 at the direction of the United Nations Environmental Program (UNEP), and further, is directly involved in the listings of threatened and endangered species (Red Book). USDA-Forest Service is a member in the IUCN and is listed as IUCN member "GA/375." The IUCN has its own Statutes and Regulations; it has its own sovereign Congress, and passes its own Resolutions and Recommendations, which in turn are implemented by the member agencies and non-governmental organizations (NGOs). As a member in this foreign international organization, and having jointly entered into other partnership contracts and several Memorandum of Understandings (MOUs) with other international organizations, the USDA - Forest Service has overriding obligations which are not disclosed in the stated purposes for the proposed rule, and are not accounted for in the Draft EIS. The systematic scheme, among other things, is known to: (1) cause forced displacement of populations. (Brady Plan); (2) be monopsonistic; (3) create monopoly enterprises; (4) cause significant social, economic, and political harm; and (5) cause the cultural extinction of indigenous people and the loss of specific knowledge. This continued nondisclosure and intentional deception by the agency violates the duly ordained and established Constitution, the principles of the Law of Nations, creates an aristocracy and de facto government, violates the Federal Advisory Committees Act, violates the Code of Ethics for Government Service, and several other provisions of existing domestic law. Although none of the Alternatives will cure this substantive defect and the adverse impacts of the undisclosed systematic international scheme, Alternative I leaves the property and resources under the concurrent jurisdiction of domestic authority. The agency's international commitments, implementing actions, and proposed rules have been and are objected to. (Individual, Lakemont, GA - #14179.50000)

2.3.2. Use of Best Science and Assumptions

Many respondents question the balance, objectivity, and accuracy of the science used in both the Draft EIS and the proposed rule. This section reveals accusations of bias, inconsistencies, lack of peer review, and non-cooperation with adjacent landowners, other land management agencies, and scientists. Many respondents are concerned that the Forest Service is not using balanced and objective data and language to clearly and fairly represent the issues. Remarks one individual, "It is apparent that the impact statement has not been prepared in a balanced or impartial environment and that its conclusions are suspect." Charges another, "Scientific data was gathered from the Committee of Scientists, known to be a biased group, without peer review, and to the exclusion of other members of the scientific community."

One point made repeatedly by opponents of the proposed rule is that the Draft EIS contains insulting and discriminatory language, and in so doing reveals a deep social bias against certain groups, particularly forestry workers. Most often reference is made to the social analysis of forestry workers on page 3-190. Respondents express unequivocal outrage over this passage and demand that, at the very least, a public apology be offered and a full retraction made.

Respondents urge the Forest Service to remove the bias created by its use of questionable references and assert that a new analysis of rural economics should be initiated. Some suggest the agency modify language contained in the draft that could be used to discount recreational values. Indeed, some suggest, pursuant to 40CFR 1502.9 and 1502.9(a) respectively, that the agency issue a supplement "to address…significant new circumstances and information" and "to address the inadequacies that preclude meaningful analysis."

A number of respondents, including elected officials, claim there are contradictions within the Draft EIS; others claim there are discrepancies between the Draft summary and parent document. In addition to concerns over consistency, many concerns are expressed over the overall quality of analysis. Many remark that much of the analysis rests on broad, unsubstantiated assumptions,

and argue that the agency must support its claims with references. Quite a few respondents feel the use of qualitative discussions and estimates should be replaced with scientific data. Some individuals point out, for example, that there is no scientific reason to extend the proposed rule to the Tongass. (As it is noted elsewhere in this summary, however, other respondents argue there is no scientific reason for excluding the Tongass). Many call into question the scientific methods used throughout this process--some noting that the agency should incorporate data and findings provided by the public into its analysis, others pointing out the need for technical expertise during local implementation.

Public Concern: The Forest Service should use balanced and objective data and language to clearly and fairly represent the issues.

It is apparent that the impact statement has not been prepared in a balanced or impartial environment and that its conclusions are suspect. (Individual, Boise, ID - #8101.42000)

Scientific data was gathered from the Committee of Scientists, known to be a biased group, without peer review, and to the exclusion of other members of the scientific community. (Individual, No Address - #9953.42000)

Establish a scientific advisory committee specializing in conservation biology. A balance in the representation of interests is necessary to ensure that self-interest is kept in check and in perspective. (Individual, Pelican, AK - #7179.63000)

I am deeply disturbed that this roadless area protection initiative was developed in a vacuum, with virtually all input coming from a select few in the environmental preservationist community…Representatives from these groups had continuous communication with and access to the federal employees directly involved in the creation of the DEIS and rulemaking, including providing the government with draft language, legal memoranda, and survey research data used to justify and frame the roadless area rule. There was not even a token effort by the Administration to involve other interested parties, and the narrow range of alternatives show the predetermined outcome. (Individual, French Creek, WV - #8597.41710)

The language throughout the draft environmental impact statement (Volumes I and II) clearly accents all the negative “ifs” that might happen with road construction/reconstruction and timber management. The point of this EIS was not to provide equitable discussion on the issue, but provide enough “ifs” so an individual would conclude that these roadless areas are necessary. Common language throughout the document indicates possibility--can, may, might and could, has the possibility. Example--Pages 3-26.
This language is unfortunate for such a document, but appropriate if one wishes to cloud the issues. (County Elected Official, Grand Marais, MN - #43757.42000)

The D.E.I.S. goes into detail about community resiliency in an attempt to justify the predetermined result. It makes absolutely no mention of studies by Robison and McKetta that reveal there is more than adequate available product to sustain existing mills and increase production while harvesting in a sustainable way. There are other unbiased publications that reveal major flaws in the current administrative attitude regarding responsible forest land management. Responsible forest managers would not leave the forest to burn, killing wildlife and fish, polluting the air and water and endangering families in the interface. (State Elected Officials or Staff, Orofino, ID - #51044.43000)

The tone of the Draft EIS is so blatantly biased toward the action alternatives it’s embarrassing. With all the bad effects listed that would occur with further road building in roadless areas it’s amazing that there is any clean air, clean water or wildlife etc. even found in the national forests. According to the Draft EIS roads are the culprit in poaching, reducing wildlife habitat, wrecking our water and polluting our air. (Individual, Pueblo CO - #6654.10000)

Finally, within the roadless rule itself, the Procedural Alternatives are supposed to be guidelines to be used by local forest managers when creating or revising a forest management plan to determine if the "roadless character" should be preserved in additional areas. However, given that the long-term intent of the National Forest Service is to significantly restrict multiple use activities in National Forests, there is concern that local forest staff will be directed to use local forest management plans as a vehicle to further that end. It is stated within the impact statement itself, that "it is reasonable to assume that the proposed procedural requirements would reinforce the effects achieved by the proposed requirements to prohibit road construction and reconstruction and that the procedural requirements would apply to a greater area than inventoried roadless areas…" (Municipal Association, Monona, WI - #19664.10210)

Public Concern: The Forest Service should remove insulting and discriminatory language and eliminate the social bias.

There are many statements in the document that appear insulting and discriminatory to various classes of people. They include logging and timber related professions, motorized users, and former and retired Forest Service employees. One example is that found on Page 3-169 stating that "Should people lose the opportunity to engage in motorized recreation, the potential negative effects would include the inability of children to experience nature; increased likelihood that youth will get into trouble because of fewer worthwhile diversions; deterioration of mental health; undermining of economic livelihoods and culture; loss of family traditions and opportunities to experience family togetherness; and lost opportunities for future generations." This makes it sound as though people who engage in motorcycle, snowmobile, off-highway, or any other motorized recreational pastime are mentally and socially unstable as compared to those who prefer to rough it on foot. (County Elected Official, Sheridan, WY - #16187.42100)

Finally, many inferences are made to past management of the national forests--that roadless areas were considered as "banks" for further development, past management has created many problems, and resources were exploited. Former and retired Forest Service employees had, and have, a commitment to management based on the best information and social demands at the time of their watch. To imply that past management decisions by these people had destructive intentions is an overreaching conclusion.
The question that begs answering is "What does the Forest Service think of other classes of people, such as ranchers, outfitters, business people, and community leaders?" (County Elected Official, Sheridan, WY - #16187.42100)

In Chapter 3 of the document (Roadless Area conservation Internal Briefing Draft 4/21/00), pages 3-189 and 190 some government goose stepper explains what the government thinks of people who work in the Forest Products Industry. I am sickened by this document. If I were rich I would demand a written apology, but as the government writes: "I live among the least prosperous communities" and I "entered this industry because it provides high wages without a high level of education" and it's my "route to a middle class lifestyle" but if an equivalent job was available I would be happy to take advantage of it. (Individual, Marquette, MI - #898.33300)

I have received a copy of the draft environmental impact statement (DEIS) regarding the President's roadless area directive. I was very shocked and angry upon discovering your statements concerning loggers and sawmill workers. I find these statements outrageous and laced with bigotry and discrimination (Page 3-190 DEIS). It is very apparent by the statements made by you and the administration, that there is little tolerance for the people of the wood products industry. However, we are shocked that you would stoop to the level you have in the DEIS to degrade us to the rest of the public. (Individual, John Day, OR - #1689.93200)

As a retired soil scientist and Area Conservationist with the USDA and the SCS who on occasion worked with the U.S. Forest Service people, I find the wording totally inappropriate which probably demonstrates the current administration is insensitive and ignorant of the needs and hopes of the people who live and work in the areas around the National Forest lands. (Individual, Thief River Falls, MN - #7501.31000)

The thrust of page 3-190 tries to convince forestry workers, their families, and policymakers that timber related professions should be abandoned because of their inherent risk and lack of job security. It implies that given these conditions, everyone affected by the roadless initiative should naturally agree with Forest Service objectives.

When the Forest Service misinterprets the composition, goals, and concerns of people in the timber industry, it mars the entire development of the roadless initiative. Forestry workers will be greatly impacted by the roadless initiative and it is necessary to understand who holds these positions and how they regard their work. (Federal Elected Official, Marquette, MI - #2814.42100)

In reading portions of the Draft Environmental Impact Statement, specifically some comments made on page 3-190, paragraph 3, I find them personally offensive and am very dismayed that an agency of my own government would slander people from rural timber dependent communities in such a callus, condescending manner.

ISSUE A PUBLIC APOLOGY

These condescending and ignorant statements are disrespectful. I demand that this text be struck from the final EIS and that a public apology be issued to the forestry workers of this country. Specifically, the 'Social Effects Related to Timber Harvest' section (page 3-190) displays a patronizing attitude toward forestry workers and the communities where they reside. It states that "if Forest Service timber management policies are consistent and reliable" then forestry workers and their communities would "adjust." It is grossly arrogant to imply that forestry workers would prefer any "reliable" Forest Service policies over their job security. These workers depend on timber harvesting for their economic stability and to remove such jobs would only exacerbate the conditions that plague some of their communities.

The Forest Service carelessly dabbles in "pop" psychology by characterizing forestry workers as uneducated, unstable, and unmotivated. It states that "many people enter the wood products industry because it provides opportunities to earn high wages without having a high level of education." Such a poorly referenced statement is particularly offensive. Many forestry workers may have college degrees but are natives of the area who prefer to live and raise their families in their hometowns while working in a profession shared by their parents. If it is true, as described in the text, that "timber dependent communities are among the least prosperous," can the residents of that area be faulted for turning to forestry jobs that pay "high wages?"

What is being done is to falsely characterize the timber industry to the public so as to enable the USFS to implement their proposed roadless area initiative. It is bad enough to have to battle with the environmental groups that want to halt timber harvests from public lands, and now we have the USFS promoting derogatory views of the forest products industry and the people and communities surrounding them. If there wasn't a forest product industry there would not be a USFS.

I believe we in the forest products industry deserve an apology and a retraction of the offending statements. Also, an answer is in order as to how and why such a rotten characterization of our people in rural timber dependent communities was allowed to be printed by the USFS for public consumption. (Individual, Pelikie, MI - #6511.33300)

I am totally dismayed by the characterization of woods workers and the forest industry. I am personally offended that this agency has not identified to the public the authors and reviewers of these statements. Public apology is not adequate in this case. (Individual, No Address - #8442.44450)

Public Concern: The Forest Service should remove the bias created by using questionable references and should conduct new rural economics investigations.

It is appalling that you would use the economic conclusions of Tom Power in your draft environmental impact statement. Mr. Power says that while the national timber program has plummeted, Montana has gained significant economic vitality. What planet is he on? (Individual, Missoula, MT - #10467.93100)

Chapter 3--Affected Environment and Environmental Consequences, page 3-190, attributes several "facts" about timber dependent communities and forest products workers to an inappropriate source (Power 1996). This book is not a primary source on the sociology of rural communities, it is not a peer-reviewed article from a professional journal, nor is it an unbiased review of case studies on rural economics. In fact, Power (1996) is an extremely biased book critical of the forest products industry. The Amazon.com book review for Power (1996) contains the sentence: "A professor at the University of Montana, his is the perfect perch from which to regard the rapacious

plunder of local and state economies by the mining and timber companies." Hardly an unbiased source appropriate for reference in an environmental impact statement.
Because Power (1996) is biased, unscientific, and contains factually inaccurate information, I urge you to strike all references to it from the Draft EIS. Furthermore, I suggest that in the future the Forest Service use its time to carefully investigate the facts regarding rural economics rather than utilizing dubious sources that satisfy their a priori assumptions about the forest products industry and timber dependent communities. (Individual, Bend, OR - #735.44450)

Public Concern: The Forest Service should modify language contained in the Draft EIS that could be used to discount recreational values.

I am concerned that some of the language in the roadless DEIS could be interpreted by individual land managers and environmental special interest groups in a way that negatively impacts recreational values. (Individual, Littleton, CO - #134.42100)

Public Concern: The Forest Service should issue a supplement to the Draft EIS pursuant to 40 CFR 1502.9, "to address the significant new circumstances and information" and 40 CFR 1502.9(a) "to address the inadequacies that preclude meaningful analysis."

The Elko County Public Land Use Advisory Commission would like to go on record in requesting the Forest Service, either, Supplement this Draft EIS, as per CEQ Regulation 40 CFR 1502.9(c)(ii), to address the significant new circumstances and information that is relevant to our environmental concerns and bearing on the proposed action and its impacts. Revised the Draft EIS, as per CEQ Regulation 40 CFR 1502.9(a), to address inadequacies that preclude meaningful analysis. (County Agency, Elko, NV - #17274.7000)

The roadless area protection DEIS and proposed rulemaking are deficient, both legally and factually, and flawed beyond repair. The Forest Service must prepare a supplement draft environmental impact statement (SDEIS) or withdraw the proposal. Additional information on individual roadless areas must be provided, the true ecological, economic and social impacts must be described, additional alternatives must be analyzed, and the cumulative impacts of the other major rulemakings presented. (Forest Products Company, Eugene, OR - #43862.70000)

Public Concern: The Forest Service should address contradictions within the Draft EIS.

The document is peppered with contradictory statements from one section to another.
"…roadless and other unroaded areas…are still the reservoir for future designated wilderness areas." However, page 2-17 concludes that the alternative of "Recommend All Inventoried Roadless Areas for Wilderness Designation" was eliminated from further consideration because "Most of the inventoried roadless areas in question have already been evaluated for wilderness in the land management planning process and it was determined for various factors that those areas should not be designated as wilderness." (County Elected Official, Sheridan, WY - #16187.31300)

Page 3-242, paragraph 5, "If implemented, the proposed prohibition (Alternative 2) would maintain long term productivity by reducing loss caused by road construction to watersheds, soils, critical habitat, and dispersed recreation activities in inventoried roadless areas when compared to the no action alternative (alternative 1, A, T1). The alternative prohibitions (Alternatives 3 and 4) would further maintain the long term productivity of these resources by reducing effects caused by timber harvesting. Page 3-245, paragraph 2 "If implemented, the proposed prohibition on road construction would reduce road caused irreversible and irretrievable commitments to watersheds, soils, critical habitat, and dispersed recreation activities in inventoried roadless areas on NFS lands compared to potential roading effects under the No Action Alternative.

These statements are contrary to the statements on page 3-43, paragraph 2-4, which state that Alternative 3 would increase the long term risks associated with large and damaging fires. On page 3-43, paragraph 3 states that Alternative 4 would lead to an increased incidence of large, damaging wildfires, and their related effect on soil, water, and air resources and threats to human safety and property. Paragraph 4 states that this alternative (4) poses additional considerable effects over Alternative 2 and 3. Primarily, the effects would be increased long term damage of soil, water, and air resources on site and downstream. The increased likelihood of harm to human safety and property in the expanding wildland urban interface are of particular concern. The draft EIS offers conflicting testimony about the effects of roads, the increased likelihood of large fires and the likelihood of harm to human safety and property (State Elected Official, Salt Lake City, UT - #43918.72300)

Public Concern: The Forest Service should address discrepancies between the summary and the Draft EIS regarding local authority prior to plan revisions.

Page S-9 and Page 2-7 and 2-8--The descriptions of "Alternative B--Proposed Action and Preferred Alternative" between the Summary and Draft EIS are different. Since a majority of the public and local governments read the Summary, the description of alternatives is misleading. The Summary makes it appear that the Forest Service will allow road construction and reconstruction until Forest Plan revisions are undertaken with a full range of options, including the use of roads. The DEIS closes the door for local officials to consider roads as a management option by adding the sentence "…local responsible officials could not authorize the construction or reconstruction of roads…" Relief: The Forest Service must clarify the Summary to be consistent with the parent document. In addition, the Forest Service must determine, identify, and address the numerous comments received from individuals, groups, and local governments that read only the Summary and interpret it as leaving a full range of options open in the future. (County Elected Officials, Worland, WY - #16185.31200)

The summary does not present a true recap of the information contained in Volume 1 of the Draft EIS. Items of utmost importance are in the summary that do not coincide with the full document. For example: the Summary omits the importance of the local managers having power to decide on the future disposition of roadless areas. (County Elected Official, Goldfield, NV - #16085.41240)

Part 1502.12 Summary. Each environmental impact statement shall contain a summary which adequately and accurately summarizes the statement. FOREST SERVICE DRAFT EIS--The document provides a summary that does not accurately summarize the Draft EIS. In fact, the description of alternatives and comparison of alternatives in the summary omits critical information that could lead to a misinterpretation of what the agency is proposing. For example, the summary describes the procedural proposed action as an option for local decision-makers on whether and how to protect roadless characteristics. The Draft EIS adds a sentence stating that local decision-makers could not authorize road construction or reconstruction. The summary gives broad discretion and the Draft EIS takes it away. This is not an accurate reflection of what the Draft EIS proposed action represents. Finally, the comparison of alternatives table in the summary omits many of the factors evaluated in the Draft EIS, which appears to support the proposed action. (County Elected Official, Sheridan, WY - #16187.33700)

Public Concern: The Forest Service should reassess the broad, unsubstantiated assumptions used in the Draft EIS.

Your assumption is that if there is no road then it has natural conditions and is pristine wildlife and fish habitat even after an area has been burnt over with catastrophic fires. (Individual, McCall, ID - #7575.83000)

The DEIS is replete with INCORRECT AND UNSUBSTANTIATED ASSUMPTIONS AND IMCOMPLETE AND OUT-OF-DATE INFORMATION. (Timber Industry or Association, Eugene, OR - #15879.7000)

I am in favor of Alternative #1, No Action; No Prohibitions for the following reasons: The EIS makes assumptions that are too broad & not sufficiently documented to be valid. (Individual, Pueblo West, CO - #13674.70000)

I found the analysis to be wrought with vagaries, subjective statements and opinions that are presented as facts. (Individual, Boise, ID - #8101.7000)

The Forest Service's cumulative impacts analysis in the DEIS is severely flawed. The Forest Service devotes LESS THAN THREE PAGES to what it titles "Cumulative Effects of the Proposed Rule with Other Forest Service Proposed Rules," see DEIS at 3-240 - 3-242, with only a smattering of acknowledgement in other portions of the DEIS of existing and proposed environmental laws and regulations that already protect the environment and the Forest System and minimize the ecological impact of productive uses such as mining. Other land use limitations, in Forest Plans or otherwise, or special use dedications are entirely ignored. This is hardly an adequate discussion. (Business, Washington, DC - #52224.72100)

Public Concern: The Forest Service should cite references to support statements made in the Draft EIS.

The document is full of unsupported statements that mislead the reader into concluding that road construction, reconstruction, and timber harvest are destructive to the national forests. Examples extracted from the document include:
A. "Roadless areas are better able to respond to natural disturbances" (not supported).
B. "All three proposed rules seek to provide for long-term environmental sustainability, ensure collaboration with the public…" (collaboration was not used for this proposed rule).
C. "More than half of the timber harvest volume is expected to be from clearcutting…clearcutting is an important cause of biodiversity loss." This is misleading and contrary to other statements, such as, "Nationally, clearcutting has decreased from 31% of total harvest acres in 1989 to only 10% in 1997."
D. "Unroaded areas are viewed as banks for future resource development" (not supported).
E. "Roadless and other unroaded areas…are still the reservoir for future designated wilderness areas" (not supported).
F. The section addressing cumulative effects states that roadless areas will be managed "… in perpetuity unroaded." (Only Congress has the authority to decide on such an action). (County Elected Official, Sheridan, WY - #16187.42100)

The quality of this DEIS reflects the rush in which it was produced. It lacks specific studies designed to provide useful information to support it. It misuses, misunderstands, and misuses other information, resulting in the inaccurate and insulting references to woods workers and logging communities found in Chapter 3. This is not the kind of work we expect from the Forest Service. There is no hurry to get this thing done! If you insist on doing it, do it right. Individual, Colorado Springs, CO - #59459.44410)

Public Concern: The Forest Service should replace the use of qualitative discussions and estimates with scientific data.

Everything in the DEIS appears to be a sentimental guess. "Qualitative discussion" and "estimates" don't cut it. (Individual, Bozeman, MT - #12496.82000)

I fail to see how a programmatic EIS can be site specific. Your analysis contains many generalities and sound bites, but yet you call it science based. (Individual, McCall, ID - #7575.83000)

Strong evidence suggests the information used to the development of the plan was erroneous at best further eroding its viability. (Preservation/Conservation Organization, No Address - #8412.70000)

NO SCIENTIFIC DATA SUPPORTS THE ROADLESS PLAN IN THE TONGASS

There is no scientific data to backup the roadless plan in the Tongass. (Individual, Ketchikan, AK - #5665.70000)

Public Concern: The Forest Service should use scientific methods and analyses in reviewing this proposed rule.

As most of the decisions made in the past 8 years, the government agencies doing research and studies of proposals have used unscientific or nonexistent methods. I do not trust any research or studies done by the Forest Service produced in the past 8 years. (Individual, No Address - #1609.82000)

Integrating SCIENCE into this process, whose science? (Individual, Sovey, MI - #670.70000)

I oppose: The junk science is being used to support why this is necessary. (Individual, Pembroke Pines, FL - #3422.70000)

Public Concern: The Forest Service should incorporate the data and findings provided by the public into its analyses.

The Forest Service should be paying the public for doing its work, since this kind of work is not prioritized and therefore never gets done. (How long has it taken for the FS to do this inventory? And it's still not complete.) The citizens have had to do it in order to save what is left of healthy habitat. We continually present to you our work and findings so that you will hopefully at least incorporate the data and actually do something with it. Most of the time, the biology and scientific staff is impressed, while the administrators again give it lip service. (Individual, Tucson, AZ - #10802.93622)

Public Concern: The Forest Service should address the need for technical expertise during local implementation.

Who will review the purpose/need for roads that fall under exceptions 294.12 b (1,2,3 and 4)? This will be an avenue for abuse unless reviewed by regional officers, etc. Sections 294.13 a (1,3,4,6 and 9) are closely related and perhaps will be the most important evaluation criteria considering the purpose/need of this proposal.
A-28 Section 294.13 b (2) “sufficient size, shape, and position”--will responsible officials be properly informed as to what constitutes these things? Consultation with staff experts in GIS and biological disciplines will be crucial here. (Individual, Leavenworth, WA - #15897.41000)

2.4. Public Involvement Processes

Comment submitted on public involvement ranges from some accolades to a great deal of criticism on all aspects of the process. On the whole, respondents feel the process was not open or available to a wide range of participants and that this was done purposefully to keep certain constituents out. Some people, however, believe the Forest Service went to great lengths to include as many members of the public as possible.

One issue raised by more than one respondent is the availability of local line officers, who, they assert, “should be accessible to the public for comment and public review before decisions are made and implemented.” Others express dismay that they did not receive information they requested in either a timely manner or at all, and ask the Forest Service to respond to this problem. These respondents wonder how they are supposed to comment on documents they seem unable to obtain.

Public comments are separated into the following subsections: Subsection 2.4.1 Public Meetings; Subsection 2.4.2 Comment Period; Subsection 2.4.3 Public Input; and Subsection 2.4.4 Analysis of Public Comment.

Public Concern: The proposed rule should call for continued public processes and information sharing.

The proposed rule was developed without balanced public input. Not all parties were invited to participate in the process. (Business Association, Barre, VT - #9260.44400)

The inventory for our area (the Alpine County portion of the Humboldt-Toiyabe NF) was done in secret with no participation by any county officials, no local notification, and no local public participation so far as we have been able to determine. (Individual, Markleeville, CA - #13284.42000)

I look forward to continued involvement in this public process for better forest health and ecosystem management in light of the most important roadless area values and characteristics as delimited and emphasized in this letter and your booklet "Roadless Area Conservation." (Individual, Corvallis, OR - #5157.44000)

I appreciate how much effort the Forest Service put forth in helping me understand this complex and important issue. (Individual, Sedro Woolley, WA - #7644.44100)

I do appreciate your open process and your extraordinary effort to solicit and consider public comment. (Individual, Half Moon Bay, CA - #8387.44400)

LOCAL MANAGERS SHOULD BE ACCESSIBLE

The designated local manager should be accessible to the public for comment and public review before decisions are made and implemented. (Individual, Corvallis, MT - #9400.44000)

INFORMATION SHOULD BE DISSEMINATED

Late last year I sent…Chequamegon-Nicolet National Forest a letter seeking info about this proposed Roadless Area rule. Dec. 27, 1999 I sent a similar letter to…USDA Forest Service. Feb. 29-00 I sent letters to [my representatives in Washington] seeking info about the proposed Roadless Area rule. I never received any kind of response from any of these people. This made me feel betrayed and suspicious. (Individual, Pulaski, WI - #2842.42000)

Freedom of Information Act requests to the District, Forest, Region and the Washington Office and to our Congressman's office for information on the inventory participants and process have been completely stonewalled. A member of Sierra Club stated in a public meeting that Sierra Club had paid to have the inventory done. (Individual, Markleeville, CA - #13284.42000)

I requested a Roadless DEIS (both a hard and electronic copy) and I still have not received it. How is the public supposed to be able to effectively review the DEIS if we have not received it? (Individual, Sacramento, CA - #2834.44220)

Many members of our organization have requested copies of the documents and have not received them to date. Their opportunity to respond will not be 60 days. This appears to be questionable legally. (Environmental/Preservation Organization, Harte, CA - #92.44460)

We are now nearly one-third the way through the comment period with public meetings underway and I have not received a copy of the EIS and Rule that I requested nearly four weeks ago. As an Association who represents small forest product companies who purchased nearly 70% (as a class of purchasers) of all federal timber sold last year it is unconscionable that the Agency cannot seem to fulfill our request for copies of the EIS. I will be contacting our

congressional delegations, and am considering going to court to delay the listening sessions unless we receive our requested material within the next week….We have requested copies of these documents electronically, through fax, and letter, and through post card. What do we have to do to get copies? (Timber Company or Association, Beaverton, OR - #95.44460)

2.4.1 Public Meetings

Respondents express a wide array of concerns relative to public meetings. Many believe inadequate notice was given, some further suggesting that an advance notice of agenda and format might encourage greater attendance. By far most who comment on this topic, however, believe the Forest Service should set an adequate number of public meetings at convenient times and locations. Some respondents, notably from the East and from southern coastlines, believe the locations needed to be much more centrally located and feel discriminated against because they do not live adjacent to a forest boundary. This complaint is equally true of urbanites in general, who enjoy the recreational opportunities provided by the national forests and believe better options should have been given for them to attend. While locations are of particular interest to many, some also comment on dates chosen, scheduling conflicts with other community events, and time of day. These respondents, on the whole, do not feel the Forest Service was sensitive to the needs of the community or to people traveling long distances.

Respondents express concern as well that the Forest Service should ensure that meetings are conducted fairly. For some, this means making sure room size is adequate. These respondents do not believe the agency planned or anticipated well when picking places to hold its meetings. This was a particular problem in the western states where attendance was at an unprecedented high, as in Missoula, Montana, where people had to be turned away for lack of space. For others, ensuring fairness means making sure someone is there to record the comments.

A number of individuals express concern that the PowerPoint presentation was biased, misleading, and inaccurate. In this regard many respondents feel the Forest Service needs to make greater effort to make its presentations in public meetings clearer and more accurate. This could be done by providing relevant materials and perhaps photographs of areas in question. At least one individual is so concerned over the adequacy of the public meetings that “Senate hearings [should be held] on the U.S. Forest Service’s handling [of them].” Another individual writes in protest of not being allowed to carry a sign into the meeting hall; while yet another complains of the inappropriateness of allowing environmental groups to set up booths and sell merchandise.

Public Concern: The Forest Service should give adequate notice of public meetings.

[Let] the record show that this opposition is based on: Inadequate public notice (two days) concerning public hearings held by the Forest Service concerning this proposal. (County Elected Official, Spooner, WI - # 2358.44130)

GIVE ADVANCE NOTICE OF FORMAT AND AGENDA

Thank you for holding this information session. You may get better attendance if the public was told in the meeting announcement that the presentation is set up to "walk through" or as an exhibit. When I thought it was to be a 2.5 hour "meeting" I was kind of dreading it. It was very well presented, helpful, and very professionally done. (Individual, Pueblo West, CO - #610.44140)

Public Concern: The Forest Service should set an adequate number of public meetings at convenient times and locations.

180 meetings were not enough to make the public aware of the total plan. (Individual, Poncha Springs, CO - #8419.44100)

A scattered meeting schedule has made a farce out of the whole process. (Timber Association, Lewiston, ID - #13352.44100)

Why aren't you holding public hearings in all parts of the country? A person in Guam or New Mexico has just as much to say as a person in Idaho. These are National Forests. (Individual, Sagle, ID - #13703.44100)

These meetings should be held in the evening or on the weekend in order to facilitate the greatest attendance by those wishing to make their opinions known. To do otherwise begs the question whether or not the Forest Service genuinely values the opinions of those who were not afforded the "inside track" to creating policy at the national level. (Individual, Canon City, CO - #1103.44120)

This is not a public meeting on the Roadless Initiative and its effects on the Allegheny National Forest. The term public is defined as "the people constituting a community, state, or nation." This is supposed to be a meeting to receive public testimony on the national Roadless Area Policy Initiative and its effect on the Allegheny National Forest."
It should have been held in a central location like State College or Harrisburg on a Saturday when the working public could have attended or regional meetings should have been held in multiple locations.
[The supervisor's] behavior is a continuing embarrassment to the public concerned about the protection of our National Forests. This so-called public meeting is a farce, and will produce management comments expected from timber dependent communities adjacent to the Allegheny National Forest. [The supervisor] has been told by letter and at other so-called public meetings to schedule meetings in centralized locations at accessible times. If he does not understand the word PUBLIC as it relates to our National Forests, he should resign. (Individual, Kane, PA - #7841.44100)

Why is New Jersey left out of hearings on roads in forests? I understand the US Forest Service recently scheduled within the last 45 days--300 hearings on roads in forests? Is New Jersey a stepchild? I saw no notice of any hearings on this matter in New Jersey. Are we left out? As citizens of the United States, it seems to me that [the] Forest Service routinely has a policy of excluding metropolitan areas from questions such as these and that is not right. (Individual, Florham Park, NJ - #19717.44000)

Since we have many, many millions of people who are paying taxes to support your Service and we like to have our views heard, when are you coming to Morristown, New Jersey to make a presentation like you are doing in Alexandria, VA.? (Individual, No Address - #6060.44110)

I find it peculiar that the only meeting in Illinois is held in Marion, approx. six hours driving from Chicago (the main population center), on a weekday, on the first day after a long weekend. This does not look like you are really interested in a large turnout. (Individual, Deerfield, IL - #782.44100)

On behalf of over 5,000 members of the Houston Sierra Club, I am requesting the Forest Service in Texas conduct public meetings on the weekends or evenings in Houston, Dallas-Fort Worth, Austin, and Beaumont…Currently, one informational meeting is planned for 06/06/2000, 6-8 pm, in Lufkin, Texas at the Federal Building and one comment meeting is planned for 06/27/2000 at the same place and time.
It is unreasonable to make a person in Houston, Texas drive 2.5 hours, 100 miles, to Lufkin, Texas during rush hour traffic to give public comments on roadless areas. (Environmental/Preservation Organization, Bellaire, TX - #1715.44100)

Apparently no public hearings on the policy for roadless areas are scheduled for my state of Massachusetts. (Individual, Brookline, MA - #167.44110)

It is…noted that in your public meetings, you have left out the San Francisco Bay Area. (Individual, Santa Clara, CA - #550.44110.

I'd like to know why there is no public involvement meeting being held in Oklahoma. Russellville, Arkansas is the closest place for Oklahomans to attend a meeting and it is five hours away! (Individual, Oklahoma City, OK - #2264.44110)

Surely meetings could be scheduled in Kansas City. Or would that mean too many folks might show up? (Individual, Kansas City, MO - #2375.44110)

I request that one of the meetings be held at the Mt. Hood Headquarters in Sandy, Oregon. (Individual, No Address - #1767.44110)

There are not any meetings being held in my home state of Maryland for me to attend. (Individual, Timonium, MD - #4827.44110)

The Gustavus Community Association and the people of Gustavus have a long history of involvement in Tongass issues. We would like the opportunity to comment on the Forest Service National Roadless Initiative, and request that you schedule a formal hearing here.
Please note that although the Forest Service is holding a hearing at Hoonah, it is not practical for those in our community to attend that hearing because of the time and expense of traveling there by air or water. (Local Community Organization, Gustavus, AK - #747.44150)

I believe the informational meetings did not tell the whole story and were conducted too quickly after the release of the DEIS. There was insufficient time to study the DEIS and ask responsible questions. (Individual, Salt Lake City, UT - #13258.44130)

Public Concern: The Forest Service should ensure that the meetings are fairly conducted.

Let me reiterate that I am a professional wildlife-biologist, former FS employee and that I have worked for the USDA and USDC for over 20 years. I know the CFR's and have a very well rounded working knowledge of the NEPA process. I am honestly quite embarrassed for the FS after hearing the last roadless presentation that I attended (Six Rivers NF, R-5). They had the gall to have their senior recreation person (and former rec staff officer) do the PowerPoint presentation … how ironic, don't you think? (Individual, Kneeland, CA - #7085.41200)

I attended one of your public hearings in Portland, OR on June 21, 2000. Thank you for the fair minded way in which these were conducted. (Individual, Portolla Valley, CA - #11305.44100)

Procedure counts. The Forest Service must improve public meetings. Until the agency learns to write and speak specific, concrete, definite English—that is clear and precise—it will only draw the disrespect of the public. (Individual, Reno, NV - #7514.44100)

BY RESERVING LARGE ENOUGH MEETING ROOMS

I attempted to attend the Public Hearings on your proposed rule on roadless areas in Missoula, Montana on 6/21/00. . . . the meeting area was too small to hold the number of the people that wished to attend, and the Forest Service should have been responsible for holding the hearings in an establishment capable of holding a larger number of people…I believe your meeting area in Missoula was only capable of holding five to seven hundred people. I believe there is something very wrong about holding a "public hearing" and then denying access to any member of the public who wishes to attend. (Individual, Seeley Lake, MT - #9402.44110)

BY RECORDING COMMENTS AT ALL PUBLIC MEETINGS

I came a long way to have my comment recorded and no one was here to record. (Individual, Big Bear City, CA - #13472.44110)

Public Concern: The Forest Service should modify the PowerPoint presentation.

Your power point presentation on the Draft EIS was also biased. How can someone cut firewood in a roadless area and get it home without a road? How many Christmas trees are hauled out of roadless areas without a road to get it home on? The presentation seemed to be set up to put as positive a political spin on it as possible. (Individual, McCall, ID - #7575.42000)

[The] power point program was misleading in the fact that the acre used for urban development will not change public land management at all. (Individual, Spearfish, SD - #1448.44100)

The Roadless initiative, when combined with the revised travel plan guidelines, puts imbalanced priority on ecological concerns at the expense of recreational and economic concerns. This negatively impacts local users whose voice is muted by this imbalance. This means that the PowerPoint is misleading and disingenuous when it says that only new roads would be prohibited under the preferred alternative. In fact, under the Roadless initiative many roads and trails could be decommissioned without sufficient local public input simply to get them off the forest inventory. (Individual, Littleton, Co - #1219.72100)

On May 30, in Reno, we had the distinctly unpleasant experience of listening to a "PowerPoint" presentation on the Forest Service's Roadless Area Conservation Proposed rule and Draft Environmental Impact Statement. As a public information meeting, this presentation was confusing, given without the use of common sense or reasonable language, and altogether insulted the public's intelligence. Not only was the language of the presentation obfuscating, but also occasionally it was downright Orwellian. The emphasis on "local" decision-making, and the particular term used for communities who rely on exploiting and depleting natural resources was particularly repellent. (Individual, Reno, NV - #7514.44140)

Public Concern: The Forest Service should make its presentations in public meetings clear and accurate.

In our opinion, the informational meetings have not told the whole story. (Individual, Lake Havasu City, AZ - #2752.44140)

I appreciate the research and work that the Forest Service and BLM have done to present the options clearly to the public. (Individual, Great Falls, MT - #6444.31100)

The information meeting I attended left the public thinking they were still in the dark. We received distracting answers, the kind that didn't address the "meat" of the question. We received "double talk" answers, and those aren't my words, those were the words of those sitting around me. In some cases, we received no answer to a question; an even bigger insult. (Individual, Burbank, CA - #5655.44140)

BY PROVIDING MATERIALS AND DEFINITIONS

Public meetings were further lacking in materials and content that would explain the numerous new labels and definitions that are critical to public comment regarding such massive changes in federal land management. (Timber Association, Beaverton Oregon - #52230.44150)

BY USE LOCAL PHOTOGRAPHS AS EXAMPLES

About the presentation, I liked particularly the display maps, the take-home charts, and the booklet ROADLESS. I'd suggest that instead of slide-shows with readings that there be a few fine photographs of the country this plan will preserve. We might all spend several minutes in a quiet room with a good picture of the forests we know. (Individual, Concord, NH - #3428.44250)

THE SENATE SHOULD INVESTIGATE THE FOREST SERVICE'S HANDLING OF PUBLIC MEETINGS

I'm requesting that you hold Senate hearings on the US Forest Service's handling of public meetings and lack of a sufficient comment period. (Individual, Chicago City, MN - #1371.41300)

Public Concern: The Forest Service should allow people to bring signs to public meetings.

I have a sign that says simply "WE NEED WILDERNESS, NOT DEVELOPMENT," and I took it with me to the hearing for Uinta National Forest last week, and was made to leave it out in the hall. This to my opinion is taking our Freedom Of Opinion away from us. (Individual, Salt Lake City, UT - #15933.44150)

Public Concern: The Forest Service should consider the appropriateness of allowing preservation organizations to sell merchandise at public meetings.

I went to the Public Comment Meeting last night, 6-26-00 at the Doubletree Inn in Tucson, AZ. This was a meeting put on by the U.S. Forest Service. But the first thing I saw was a booth set up by the Sierra Club selling hats & stuff. What's up with that? (Individual, Tucson, AZ - #13835.44160)

2.4.2 Comment Period

Most individuals addressing the comment period for the proposed rule request extensions either because they do not believe 60 days is enough time to absorb the amount of material presented, or because they do not feel they knew about the comment period in time to give meaningful input. People express distrust in a process they feel is skewed toward more organized special interest campaigns and worry that their voice will be missed. Suggested extensions include an additional 60 days, 90 days, 120 days, until September, 2000, until December 31, 2000, and until the current administration has ended. At least one individual, however, writes that the comment period should not be extended. Some of these individuals note that protection for roadless areas has been delayed long enough.

Public Concern: The Forest Service should extend the comment period.

I am writing to request an extension to the comment period for the President's Roadless Initiative. I believe that additional time is needed to allow input from citizens who live in the impacted areas. (Individual, Boise, ID - #61.44430)

The scope and magnitude of this proposal is massive. The thought and comment time appear to be very limited, and it appears this is for political purposes of this administration. This massive attempt at confiscation of public lands deserves much more comment and "study time." (Individual, Ahsahka, ID - #63.44430)

I have concluded that there is insufficient time to perform a comprehensive analysis of this proposed rule. I make my argument based upon the fact that within the nearly 800 or more pages of text, tables, maps, and assorted summaries, there are additional untold pages of documents to review as well. When the main document refers to subordinate but controlling rules and regulations it is incumbent upon the reviewer to acquire them and review the relationships between any and all documents. (Individual, Sacramento, CA - #79.44430)

More time is needed to determine all of the details that are in the plan. (Individual, Rigby, ID - #5208.44430)

There has been insufficient time to adequately digest all of the information that is being provided, especially in light of incorrect, inaccurate, missing, confusing, and conflicting information. As an example, maps being prepared and placed into the record are changing on an almost daily basis. These maps and the designated area lines are crucial to this project. (Individual, Mammoth Lakes, CA - #13994.31000)

You have repeatedly refused to provide information, requiring filing under the Freedom of Information Act to learn just the basics of the proposal. You took only seven months to prepare a nationwide DEIS, then took five months to refuse a simple request for extension. (Individual, MacKay, ID - #8575.44200)

I don't think the Forest Service and especially the President, received accurate and fair input from all users of our forests. The extremist environmental groups, as you know are very well organized, funded and educated. The rest of us users of the forest trails and roads are not organized, funded and in many cases, not even educated…Many folks are against this proposal but have learned of it too late. Please take this into consideration when creating your final plan this winter. I was negligent myself in getting involved in this when I learned of it through my Trail Riding magazine a few months ago. (Individual, Riceville, TN - #6949.41000)

The FS, in conjunction with the release of the proposal and DEIS, scheduled 300 public meetings throughout May and June. The later meetings are for public input regarding the proposal. Therefore, it is necessary to have the proposal thoroughly analyzed prior to the hearings/meetings in June. The comment time frame actually provides for approximately 30 days to review nearly 1000 pages that affect over 55 million acres. Again, this is an incredulously insufficient comment period.
Additional time will afford the public the opportunity to provide the Forest Service with more thorough responses, thus aiding the agency in achieving a more mutually acceptable management approach. (Mining/Oil Company or Organization, Midland, TX - #2869.44430)

ADDITIONAL 60 DAYS

We believe that 60 days is not enough time for this important issue, and request an additional 60-day period for a total of 120 days. (Business/Business Association, Salem, OR - #54.44430)

Considering the scope of the program I am requesting that the 60 day comment period be extended an additional 60 days, for a total comment period of 120 days. I will need this time to adequately review and respond to this initiative. (Individual, Denver, CO - #59.44430)

Grayback Forestry Inc. strongly urges that the deadline for this Draft EIS comment period be extended for 60 days. There have been significant delays in the public receiving copies of the Draft Statement that makes it difficult to develop an informed opinion. (Business, Merlin, OR - #6354.44430)

ADDITIONAL 90 DAYS

I suggest that an extension of 90 days is added to the comment period to make up the time the public has lost because they have not even received the document at this point. (Individual, Sacramento, CA - #2834.44430)

Of equal concern is the inadequacy of the 60-day comment period, which is scheduled to close on July 17, 2000. It is clear that the FS is anxious to finalize the proposed roadless program without delay. However, there are many aspects of the proposal that require added time to digest and evaluate. As a result, the accelerated time frame imposed by the FS is inadequate for sufficient public review and response. Therefore, we respectfully request that the FS extend the comment period on the proposed roadless DEIS by 90 days in order to afford the public an opportunity to give the agency comprehensive high quality comments. (Wise Use or Land Rights Organization, Denver, CO - #6356.44430)

ADDITIONAL 120 DAYS

Your proposal is complex and needs careful review. I request a 120 day extension in the comment period so that it can receive full consideration. (Individual, Lakewood, CA - #105.44430)

This initiative has a major affect on many people and it appears to me that the 60 day comment period offered is incredibly inadequate. The consequences of this initiative need to be understood by all parties affected, consequently I would suggest at least six months of discussion with opportunities in all affected areas. (Individual, No Address - #56.44430)

The Southern Council hereby requests a 120-day extension of the public comment for the draft environmental impact statement (DEIS) and proposed regulations to protect roadless areas within the National Forest System. The original 60-day public comment period is completely inadequate to review and develop substantive comments on such a complex and far-reaching proposal. In order to develop substantive comments, the public will have to review and analyze the 500-page DEIS which many have not yet received. (Timber Association, Atlanta, GA - #2860.44300)

We ask that you consider the burden on the public of reviewing and preparing comments of multiple, complex regulatory proposals and extend the public comment period 120 days. The magnitude of the changes in national forest management and land and resource planning is enormous and cannot be fully reviewed in the allotted time. An additional 120 days is only a small request in relation to the length of time these regulations have been under revision and the potential impact of the changes being proposed. (Business, Portland, OR - #2872.443000)

Mountain City Lumber Company requests a 120-day extension of the public comment on the DEIS and proposed regulations to protect roadless areas within the National Forest System. The original 60-day public comment period just is not enough time for the public [to] review and develop educated comments on such a complex and far-reaching proposal. In order to submit educated comments, the public needs to be allowed proper time to educate itself on the 500-page DEIS which many have not received yet. (Business, Bloomery, TN - #2873.44300)

Two factors restrict the ability of local governments, counties, and conservation districts to adequately review the Draft EIS: 1) Over 350 sources of information were referenced (some even in press), and 2) The 60 day time frame to access, review, and comment on the conclusions of these references is unrealistic. The Forest Service must extend the comments period to 180 days to allow local governments adequate time to access and review the incorporated information. (County Elected Official, Sheridan, WY - #16187.44430)

UNTIL SEPTEMBER, 2000

I also request that the public comment hearings be postponed until September 2000 to allow myself adequate time to review the 700-page DEIS. The original 60-day public comment period is inadequate to review and develop comments [on] such a complex and far-reaching proposal that impacts management of 54 million acres. (Individual, Oroville, CA - #2846.44150)

UNTIL DECEMBER 31, 2000

I respectfully request that the public comment period be extended until the end of this year. (Individual, San Louis Obispo, CA - #43.44430)

I respectfully request that the public comment period be extended for a reasonable time (until the end of this year does not seem at all unreasonable based on the way this issue has been ramroded down our collective throats). There is absolutely no reason to rush the comment period with a ridiculous deadline like your proposed July 17 date. (Individual, Roy, UT - #42.44430)

UNTIL THE CURRENT ADMINISTRATION HAS ENDED

We need more time and information to make an intelligent decision on these proposals. Under no circumstances should a decision be made until the current administration "expires." We have seen way too much politically expedient abuse by them already (Calif, Utah, Ariz). Much more time should be taken before any decision! (Individual, Ahsahka, ID - #63.44430)

Public Concern: The Forest Service should not extend the comment period.

Please do not extend the comment period by 120 days. It's a ploy by the timber industry to extend the comment period until Clinton leaves office. (Individual, Missoula, MT - #10482.41720)

2.4.3 Public Input

This section presents specific concerns regarding both the effectiveness of public input and ways in which the Forest Service could improve its public outreach. As mentioned in the previous section, many people request extensions of the comment period because they feel 60 days is insufficient time to analyze the proposed rule and other recent initiatives and make informed comment. That sentiment sets the tone for many of the comments received regarding public input. Some believe that education is the key to a better-informed public. These respondents do not feel the Forest Service does a good enough job explaining the effects of its actions. Indeed, some write that the scoping process was itself inadequate, resulting in an inadequately prepared Draft EIS. Many respondents believe the Forest Service should create more opportunities for public input by e.g. improving notifications and mailings; providing reliable internet access to documents; improving information access for those without computers; mailing out questionnaires; and surveying forest users.

Other concerns relate to the content of public comment, and how comments are treated by the Forest Service. One individual feels the Forest Service should avoid soliciting emotionally charged comments. This individual was offended "by the hypocrisy and hatred" expressed by several speakers at a public meeting. At the same time, another respondent believes the Forest Service should not announce the number of comments it has received while the comment period is still open as it can discourage further input. Many respondents, however, wonder whether it even makes any difference for them to comment. Claims one individual, "I know this comment will never see the light of day!" Remarks another, "I don't think you will pay any attention to this. I'm sure that is how most Americans feel about our government." Finally, several respondents express concern over the agency's seeming lack of respect for employee comment. These respondents say they do not see any evidence in the Draft EIS or proposed rule that

employee input was considered. They are concerned that employees have been directed not to be involved and suggest the reason may be because so many out in the field are not in favor of this proposal.

Public Concern: The Forest Service should provide sufficient information regarding the potential effects of all recently proposed plans so the public may be better informed.

In particular, the agency is proposing a new transportation management policy that will affect forest plan revisions; it is proceeding with a planning rule in the absence of a complete strategic plan; it is proceeding with a roadless area policy which will override any and all planning efforts; and it is proceeding with forest plan revisions and amendments which ultimately may be altered by the national policy initiatives. In this context, it is clear that insufficient information is available for the public to provide informed comment on this roadless area protection proposal. (Individual, Bristol, VA - #1116.44010)

It would sadden me very much to see these areas closed; I believe that education is the key. Let people know that the closure of these areas could result in no one going into them. It could result in no timber harvest, which results in dead decaying timber that produces more gas than oxygen.
It is vital that people be informed and understand the real influences that such measures will have in their lives. (Individual, Los Gatos, CA - #8668.44000)

Public Concern: The Forest Service should address the adequacy of the scoping process and subsequent information disclosed in the Draft EIS.

The scoping for preparation of the DEIS was inadequate under the National Environmental Policy Act (NEPA) and the National Forest Management Act (NFMA). Under binding NEPA regulations, there “shall be an early and open process for determining the scope of issues to be addressed and for identifying the significant issues related to a proposed action” that will be addressed in the EIS. 40 C.F.R. 1501.7. The Forest Service failed to provide the public with adequate information on the roadless area initiative to allow informed public comment on the scope of issues to be addressed or on the significance of issues related to the proposed action. For example, during the scoping stage, the Forest Service could not provide information on the location and area of the national forest lands affected by this proposal. Indeed, as discussed above, the Forest Service is still unable to identify all the lands that will ultimately be impacted by this proposal. (Mining Organization, Reno, NV - #15907.44410)

The DEIS is a flawed document due to the Forest Service's failure to perform adequate scoping. While the Forest Service [held] “scoping” meetings and sought public views on roadless issues, these public meetings and written comment period do not fulfill the function of NEPA scoping. The purpose of NEPA scoping is to allow the public to identify issues and alternatives associated with NEPA review of a proposed agency action. See 40 C.F.R. [section] 1501.7. But that purpose was not met regarding the proposed rule because the Forest Service, during this “scoping” activity, never adequately identified the land to be impacted by the initiative. Not once did the Forest Service during the “scoping” period provide a description of the proposed action that would allow the public to effectively participate in scoping the draft EIS. The Forest Service's failure to adequately identify the land to be impacted by its proposal at the time of the scoping activities made informed participation in the scoping process impossible. (Timber Industry or Association, Eugene, OR - #15879.7000)

Public Concern: The Forest Service should create more opportunities for public input.

More opportunities for citizen input need to be created and those opinions tabulated and respected as the will of the people. Economic interests cannot be given preference. (Individual, Salem, VA - #902.41510)

Given that historically leaders of our country had the insight to put these lands in the public trust, I encourage you to gather public comment from communities throughout the country not just from local communities bordering public lands. It has been my experience (living in a county that contains 70% public land) that these local folks believe they deserve more opportunity and voice in managing these public lands. It is imperative that the Forest Service does not neglect the rest of the Public who share an equal voice and opportunity to use public lands. These areas for which you propose no new roads are our National Forest and any citizen of the United States has an equal say in commenting on their management. (Individual, Dillon, MT - #7450.41500)

You have a fiduciary duty to conduct your public inquiries openly, impartially and fairly. (Civic Organization, Goleta, CA - #7088.44000)

What are the rules here—will someone respond to these concerns? (Individual, No Address - #7662.44400)

BY IMPROVING NOTIFICATION AND MAILINGS

The Forest Service purposely ignored rural communities by failing to properly notify us about public meetings and removing many people from your mailing lists. (Recreational Organization, Santa Fe, NM - #9442.44130)

If there is ever any change in the draft proposal to close, block off or restrict access to any existing roads, we wish to be notified. This would encompass improved, unimproved, and non-designated roads, such as the present roads to Wood Canyon, Santa Cruz Spring, Horse Shutumn Spring-Bell Clark Spring, etc., in the Spring Mountain National Recreational Area. (Individual, Mount Charleston, NV - #4023.71300)

It should be necessary to request an EIS before the Forest Service sends one. Unless it is asked for, it is a waste of paper and expensive. Please make that a policy of the Forest Service. (Individual, Longview, WA - #803.30000)

BY PROVIDING INTERNET ACCESS TO DOCUMENTS

Will the site accessing the DEIS be available soon? I tried it today, and only received an HTTP error. (Individual, No Address - #1318.44210)

I have attempted to download a copy of your proposed map. I have not been able to print a copy. (Individual, Enid, OK - #100.44240)

Your website request for a hardcopy is a link back to…that's right, the home web page! Is this a donkey powered merry-go-round or what? (Individual, Calpine, CA - #71.44210)

Agna [AngloGold North America Inc.] has tried on several occasions to download the DEIS from the USFS' website without any success. We eventually obtained a hard copy of the document from other sources due to inaccessibility from the website. The failure to obtain timely a copy of the DEIS and the enormity of the document strongly suggests that a 60-day comment period, as proposed by the USFS, is wholly inadequate. (Mining/Oil Company or Organization, Englewood, CO - #2878.44210)

Your website was very helpful, and well organized. (Individual, Oxford, PA - #8618.34100)

What a great web page—such appropriate use of technology! (Individual, Elton, MD - #6888.44210)

BY IMPROVING INFORMATION ACCESS FOR THOSE WITHOUT COMPUTERS

This discrimination is further against rural people, persons without access to computers, persons in certain socio-economic strata and to persons of certain race. These are expensive documents to print, mail and to review. We believe that this situation is in fact part of the intent of the Clinton-Gore Administration. The informational meetings held regarding this DEIS were not in compliance with the legal requirements of NEPA and NFMA. Public involvement by rural persons has been deliberately discouraged with these discriminatory actions. (Business Association, Beaverton, OR - #52230.54500)

BY MAILING OUT QUESTIONNAIRES

It is sad that not many people can take the time to show their interest in this proposal. Have you considered mailing out questionnaires? (Individual, Yoncalla, OR - #752.44000)

BY SURVEYING FOREST USERS

I question the survey results on your web page. As we all know, surveys can say anything you want them to say based solely upon who you chose to survey. A better way to survey might be to ask questions when hunting/fishing licenses are purchased; to survey those coming into national and state parks; to survey families enjoying a picnic in a forest park or wayside. This would give you the opinion of more than environmentalists or others with big lobbying groups and large memberships and an endless supply of stamps. (Individual, Krakow, WI - #1750.44210)

Public Concern: The Forest Service should avoid soliciting emotionally charged comments.

I was offended by the hypocrisy and hatred that was prominent in the speeches at the meeting. One person, adamant on closing all roads and halting all timber cutting, drove 150 miles of forest roads that day to verify timber cuts, some of which she stated were on privately held land. Another stated that to drive a vehicle in HIS forest allows him the right to drive a backhoe in your yard. Another stated that the animals scream for you to "get the hell out." It concerns me that the Forest Service is soliciting this type of "scientific research" for the stewardship of the National Forest that belongs to all of the American people. (Individual, Oroville, CA - #17813.44100)

Public Concern: The Forest Service should not announce the number of comments received while the comment period is open.

We must conclude with our most serious concerns for the approach that you have chosen to utilize in public involvement in the Roadless Area Conservation policy proposal and DEIS. It is obvious that public involvement has evolved from the intent of NEPA and NFMA to a political tool for substantiation of your agenda. This amounts to political and undue influence of a very few over the management of huge federal land areas that effect all Americans. This is especially of great concern to those rural persons living closest and in an economic relationship that is dependent of those federal lands. It is inappropriate, at best, for your agency to publicly announce the number of comments received during a public policy making process. The use of numbers and statements that include "nearly 365,000 written responses to the notice of intent" have implied strong support for the Preferred Alternative. This serves to discourage those of us who have considered and analyzed the contents of the proposed policy and the DEIS. (Timber Association, Beaverton Oregon - #52230.44410)

Public Concern: The Forest Service should give assurance that the public's comments are considered.

Most of us wonder if our comments will ever be considered. Your rush "to get this done--damn the consequences" is recognized. (Business/Business Association, Boise, ID - #75.42000)

I know this comment will not see the light of day! (Individual, No Address - #2482.42000)

It was…stated that no roads would be closed without public comment, and I am finding that roads are already being closed without public comment. I believe that we have already been lied to by the Forest Service. (Individual, Las Cruces, NM - #2775.42000)

I don't think you will pay any attention to this. I'm sure that is how most Americans feel about our government. That is sad, please don't forget you are here to serve us. (Individual, Spanaway, WA - #3241.42000)

You call for the public to comment, but I hardly can believe it really matters and that you really will listen or consider what the people of this Great Northwest want for their families' lives. (Individual, No Address - #7082.43000)

Many of my friends and neighbors are so frustrated with the continued attack on their way of life and the area we live in that they are not responding to this most recent attack by the administration. They do not think that anything they say will make a difference and so are not saying anything. I challenge you to prove them wrong and keep my comments in mind as you develop your plans. (Individual, Oldtown, ID - #6697.41510)

Public Concern: The Forest Service should consider input from Forest Service employees, and clarify its policy regarding such input.

14,000 Forest Service employees who oppose this action and stated so in a letter can't all be wrong. These are the people who know the ground and how to manage it. It is obvious that the information in this DEIS does not represent input and good science from the people who work on the national forest. (Individual, Hayden, ID - #13704.41200)

When I contacted the district rangers (12) about their roadless area characteristics and values, their response was that the proposal was put together at a higher level and that they were only asked to provide the inventory maps and acres. (Individual, McMinnville, OR - #10391.41240)

Also, we hear that the rank and file of the Forest Service is really not in favor of this proposal as it's presently constituted. We think, as I said before we think that they should have a voice also. (Individual, Kellogg, ID - #21153.41240)

I am deeply concerned by a conversation that I had with another person regarding the ability of public employees to comment on the Forest Service roadless initiative. I was distributing literature and collecting signatures and addresses on the Sierra Club postcards favoring the initiative, when I asked a young woman if she would sign on. She replied that she wanted to, but would be disciplined if she did so, as she works for the Soil Conservation Service, and that all USDA employees are forbidden from doing this by what she referred to as an "ethics and conduct memo" that came from you regarding political activities.
I strongly hope that she misunderstood something, and that this isn't true. If it is, it is an infringement upon basic human rights of political activism and organization that is better suited to a third-world dictatorship, not the United States. I am also suspect of whether such a policy is even legal, as I am aware of other cases in which a federal agency attempted to discipline an employee for political activism but was turned back by the courts (refer to Todd Wilkinson's recent book, "Science Under Siege").
I simply want a clear answer from you about whether this policy is the case, and whether it is legal. I look forward very strongly to hearing your response. (Individual, Forest Lake, MN - #9001.42000)

2.4.4 Analysis of Public Comment

Concerns over the analysis of public comment cover the actual validity of public comment, how those comments are considered, and the content analysis process itself. The validity of comment is an issue for several groups and individuals. According to several respondents, the Forest Service should consider that public comment is sometimes based on inaccurate assumptions or information. This may be due to inadequate understanding of the proposal or, as a number of respondents maintain, due to the unsavory methods used by special interest groups. According to one individual, "The 'Alaska Rainforest Campaign' who is backing the roadless issue here in

Ketchikan, is running this campaign very underhandedly. They are stopping people on vacation off the cruise ships, asking them, and I quote, 'Would you like to help save the Tongass National Forest? Sign here.' They are getting lots of signatures from people that do not even understand the issues, that do not live here, that are on vacation and will sign almost anything." Respondents are thus concerned that the large volume of post cards submitted by special interest groups do not accurately represent public sentiment.

Likewise some respondents advise the Forest Service not to put too much stock in comment offered at public meetings. Both those in favor and those opposed to the proposed rule write that they felt too intimidated by the large, vocal groups representing the other side to dare stand up and speak their own opinion. Even when individuals do submit their comments, however, many wonder whether their opinions will count as much as those of special interest groups. Some ask, further, how much weight is given to local comments, suggesting--as has been noted elsewhere--that local concerns should be given priority.

Finally, some respondents express concern over the content analysis process. Some charge that the comments received during the scoping period cannot possibly have been adequately considered, given such a large volume and short turn around time for release of the Draft EIS. Another respondent feels the process does not result in a satisfactory product as the summary does not quantify public opinion. In addition, others assert that this process for gauging public opinion is inherently faulty. Claims one individual, "What you are doing is akin to a call-in poll and has the same inherent fault in its lack of validity. This creates the impression of Forest Service complacency."

Public Concern: The Forest Service should consider that written public comment is sometimes based on inaccurate assumptions or information.

In most cases OHV users are conservationists too, who care about preserving our wild lands for future generations. However, preservation and conservation mean different things. In the past public land has belonged to the "public" we had access to it. We could travel across most all of it with only a few areas that were off limits. We taught people to respect the land. This is what the average person thinks when someone asks them if they are in favor of protecting our wild lands, and they respond yes unaware it really means they will no longer have access to it or at least limited access. (Individual, Norman, OK - #5770.10212)

DUE TO INADEQUATE UNDERSTANDING OF THE PROPOSED RULE AND THE TONGASS EXEMPTION

[PVOA supports] TONGASS NATIONAL FOREST ALTERNATIVE T1. It should be recognized and expected that a Tongass exemption will serve as [a] lightning rod for various interest groups and may attract a prolific number of comments that may be based on considerably less than accurate knowledge about the region. (Business/Business Association, Petersburg, AK - #7542.41700)

DUE TO METHODS USED BY SPECIAL INTEREST GROUPS

I ask you to evaluate the "postcard campaign" originating in Ketchikan as using uneducated tourists in a spur-of-the-moment, emotional response. (Individual, Ketchikan, AK - #6990.41710)

The "Alaska Rainforest Campaign" who is backing the Roadless issue here in Ketchikan, is running this campaign very underhandedly. They are stopping people on vacation off the cruise ships, asking them, and I quote, "Would you like to help save the Tongass National Forest? Sign here." They are getting lots of signatures from people that

do not even understand the issues, that do not live here, that are on vacation and will sign almost anything. These people will never try to subsistence hunt and fish to feed their families, they do not know what it is like to live here. The people that are part of the Rainforest Campaign here in Ketchikan have not even been in the Tongass Forest! They are from down south and have come to our city to get signatures to support the roadless issue. I feel this is a very low and underhanded tactic, and it makes me mad! (Individual, Ketchikan, AK - #8117.41710)

I also think that the Sierra Club post cards should be denounced. These cards are not an individual's opinion; but an opinion of a few controlling/brainwashing figureheads of the green movement. (Individual, Auburn, WA - #47895.41700)

I joined the Sierra Club in 1972 because of my continuing agreement with their mission statement--to explore and protect wild places. Unfortunately the Club has strayed into territory far beyond this goal and are much more given to emotional ranting than reasoned analysis. I mention this so you will realize that the Club representatives do not speak for all members. (Individual, Oklahoma City, OK - #6854.41710)

When environmentalists claim that "after the forests are gone, there won't be anything left," they are misrepresenting the truth. Our forests are actually some of our most renewable resources. Today land that was clear-cut 50 years earlier is green and beautiful, providing shelter for thousands of species of plants and animals. The Clinton Administration that conceived of this proposal paints images of destruction and devastations that provoke fear of losing the natural beauty that we still have. These images are far from reality and are blatant misrepresentations of our sustainable, renewable forests. (Individual, Salt Lake City, UT - #6753.84000)

Public Concern: The Forest Service should consider that public meeting comment is skewed.

I would like to comment that I do not believe you have a fair representation of comments at this meeting. The number of pro multiple use representatives was so large that they were asked not to attend, but rather were allowed 3 minutes by one representative. (Individual, Missoula, MT - #10882.44150)

It was an insulting headline in our local newspaper, Daily Sitka Sentinel, which convinced me to write to you. It read, "Sitkans Say No to Roads in Tongass." Well, I am a Sitkan, and I say "Yes!" The article went on to say that around half of the 100 people present testified to an opposite view than mine, and only two spoke in favor… I keep my mouth shut in public so as not to be ostracized from a portion of my community. Please don't look merely at the numbers testifying as representative of the majority view in our town or in any region. (Individual, Sitka, AK - #11407.41710)

The meetings are packed with tree huggers and the average person does not even know that these meetings are being held. These meetings were purposely held during the Christmas season when most people are busy shopping and traveling to other places. (Individual, Rutland, VT - #14402.44100)

Park Falls lumber mills would be closing early so that their employees could fill this comment hearing room. This corporate manipulation of public attendance and input is wrong, and I did not want to participate in such a 'stacked deck.' I know from past experience that local hearings like this one in small rural communities are too often dominated by commodity, corporate, and/or motorized recreational interests, and those with different viewpoints are unfairly intimidated. (Individual, Ashland, WI - #15044.41720)

We are scared in our area to say much at the public meetings, but there seem to be a great many of us who bitterly oppose and resent the strong arm, money driven efforts of groups like "People for the USA" to take over the discussion and open areas to further destruction that should be protected for our children as wilderness. Again, please do everything that you possibly can to stop such efforts and preserve and heal the wild areas that we still have left. (Individual, No Address - #6378.41730)

Public Concern: The Forest Service should consider opinions of individuals equally with those of special interests.

I hope that the people who have no money for lobbies can have their opinions counted equally. (Individual, Erie, CO - #6153.41500)

I don't know how us “average” folk can fight against the powerful lobbies of the timber, mining and recreation vehicle groups (like snowmobiles) except to write to someone like you who could speak out for us. I live in Colorado because it is one of the prettiest states in the country. I am sick of seeing all the roads being cut in our national forests and I wonder whose forests they really are? (Individual, Erie, CO - #6153.41700)

Public Concern: The Forest Service should disclose how much weight is given to local comments.

Will local comments be considered more in the analysis than others? (Individual, Pocatello, ID - #2959.41510)

This land is owned by the people of the United States and should be governed by a majority of the people in the area that it is located. The majority of the people in Utah want the forestland and BLM land left to be used by the people for the people. (Individual, Gunnison, UT - #10770.41510)

Public Concern: The Forest Service should acknowledge that comments received during the scoping period were not adequately considered, given such a short turn around and large volume.

THE URGENCY TO GET SOMETHING DONE BEFORE THE ADMINISTRATION CHANGES HANDS IS SHAMEFULLY COMPROMISING DUE PROCESS. For example, we believe the written comments during the scoping period were not adequately considered. There were only 27 weeks from the October 19, 1999 Notice of Intent date to the May 10, 2000 DEIS release. It would take 28 people working 40 hours per week to evaluate the 365,000 responses, IF they spent only a menial 5 minutes per response (assuming all responses were available during the evaluation period). Is this a comprehensive and reasonable review of such an important topic? (Recreational Organization, Salt Lake City, UT - #15896.44410)

Public Concern: The Forest Service should improve its quality of content analysis.

This proposal was supposed to have been guided by the public comments submitted and analyzed by the Comment Analysis Enterprise Team. I have read the report published by this group. The report is written in a manner that makes it nearly impossible to determine public desires with the exception of the fact that no one likes the proposal. The report only gives a total number of comments and then breaks them down into categories and gives “representative” examples of each category. Almost every category included pro and con sentiments. There were no statistics given as to quantity of comments in each category or whether they were pro or con. An additional element missing that was used by the BLM in their development of a management plan for Escalante was a listing of all parties who commented and what category their comments fell into. By looking at this data, it is possible for an individual to determine if their comments were received and if they were categorized correctly. This becomes an issue when you see comments in the DEIS that are in conflict with comments received and reported by the CAET. (Recreational Organization, Huntsville, AL - #10130.41230)

Public Concern: The Forest Service should address its process for gauging public opinion.

This whole process is supposedly driven by public input, the problem is that the validity of the public input is not being addressed. Instead of valid public opinion surveys based on scientific methodology, what you are doing is akin to a call-in poll and has the same inherent fault in its lack of validity. This creates the impression of Forest Service complacency. (Individual, Sovey, MI - #670.42000)

The Forest Service is fond of saying that management direction is not determined by a voting process, yet this action is predicated on the assumption that the "majority of Americans" want it, based on questionable polls conducted by various special interests. That is indeed no way to manage our national forests. (Individual, Loveland, CO - #11335.41000)

At the Forest Services' Ellensburg "Informational Meeting," the question was directly asked concerning why the Forest Service appears to be dismissing the public's expressed will to stop logging the roadless areas. The response was that the Forest Service doesn't "hold voting contests to decide its management policy"—or words to that effect. Further, that "there are many other factors that have to be considered to arrive at a policy." (Individual, Ellensburg, WA - #10835.44160)

Chapter 3 Legal Issues and Concerns

This chapter covers public comments on legal issues relating to the proposed rule. Section 3.1 covers General Legal Issues; Section 3.2 covers Federal Environmental Acts and Laws; Section 3.3 discusses Federal Land Management Acts and Laws; Section 3.4 deals with Mining Acts; Section 3.5 covers Proposed Legislation and Acts; and finally, Section 3.6 discusses Treaties and Tribal Laws.

3.1 General Legal Issues

This section deals with comments concerning the public's perceived failure of the Forest Service to comply with general laws. Constitutional Law is covered in Section 3.1.1. Section 3.1.2 covers Federal Law. Executive Orders are covered in Section 3.1.3. Section 3.1.4 deals with State and Local Laws. Section 3.1.5 concludes with Litigation Rulings.

3.1.1 U.S. Constitutional Law

Respondents' feelings about constitutional concerns tend to be intense. Many respondents argue that the proposed rule would violate the U.S. Constitution by granting the Forest Service a level of authority that would undermine rights constitutionally reserved for the people, the states, and Congress.

Some respondents argue that the proposed rule compromises constitutionally guaranteed civil liberties and property rights, that it violates the "Takings Clause" of the Fifth Amendment, and the First Amendment protection from government instituted religion. One individual further asserts that government land ownership is legally limited to only five percent of the land. Many respondents believe the proposed rule violates the Tenth Amendment of the Constitution by not honoring states' rights. Many state and county officials are concerned that the proposed rule does not allow them to adequately regulate and manage resources under their primary jurisdiction of the state. Concerns related to states' rights include regulation of air and water quality, wildlife, management of watersheds, transportation systems, and school trust lands, all of which are typically under primary jurisdiction of the state. Finally, many individuals assert the Forest Service lacks the authority to adopt the proposed rule because Congress has the only decision-making authority over federal lands pursuant to the property clause of the Constitution.

Public Concern: The proposed rule should protect civil liberties and constitutional property rights.

Mr. Dombeck's proposal is at its best unnecessary, and at its worst the end of civil liberties and Constitutional property rights for a vast area of this country. (Individual, Red Bluff, CA - #2341.52000)

Under Title 42 and 43, Sections 1983-1985 and 1986 of the Bill of Rights of the Constitution it states:
If two or more people go upon the road to deprive another of his rights as secured by the Constitution, that person(s) shall be guilty of a crime and can be fined 8 thousand dollars or 8 years in prison or both.
The law is very clear; no laws can be passed without due process; it borders on treason of our nation's laws.
(Individual, No Address - #17928.52000)

Public Concern: The Forest Service should not violate the "Takings Clause" of the Fifth Amendment of the Constitution.

These same "two rut," "primitive" roads are also being used by Forest Service personnel for fire suppression, among other very valid uses. Forcibly closing these roads to all uses will also eliminate the man-made water sources that both livestock and wildlife depend on. These closings constitute a "Public Taking" of land and resources of the Public Domain without compensation. That is against the law and the 5th Amendment. (Individual, Tucson, AZ - #9413.52100)

Our National Forest System (NFS) was created to be managed under the "multiple use, sustained yield" idea of public land management. Declaring these lands to be prohibited from road building and stewardship timber harvesting abrogates public ownership property rights, and changes the relationship of the State to the individual. Individual property rights are the right an individual has to acquire, use, and dispose of his personal property as he sees fit. Public lands represent property held collectively by the public. How the State acts toward an individual (or the public at large) defines the basis for numerous laws. The State's actions should be predictable for its citizens. When the State changes the rules of property ownership, including from multiple use, sustained yield to satisfy an unproven need for increased biodiversity protection, its actions are no longer predictable for its citizens. The individual or the public will not know how the State will act in a given situation. Implementation of the DEIS and the Proposed Rule in its current form would do just that. (Individual, No Address - #28995.53100)

The preamble to the proposed rule states that the proposal has been "reviewed for its impact on private property rights under Executive Order 12630. It has been determined that this proposed rule does not pose a risk of taking Constitutionally-protected private property; in fact, the proposed rule honors access to private property pursuant to statute and to outstanding or reserved rights." 65 Fed. Reg. 30286. NvMA notes that if the proposal acts to deny or restrict access to valid existing mining claims or leasable minerals under contract, then the proposal does pose the risk of taking Constitutionally-protected property.
In FOSTER V. UNITED STATES, 607 F.2d 943, (Ct. Cl. 1979), the court held that denial of any owner's access to mineral deposits on government property constituted a compensable taking within the Fifth amendment.
(Mining/Oil Company or Organization, Reno, NV - #15907.52100)

The Supreme Court also has held that denial of access can constitute a taking. UNITED STATES V. WELCH, 217 U.S. 333 (1910). In WELCH, the United States condemned and paid for a parcel of land permanently flooded by the erection of a dam but refused to compensate the owners of a right of way that crossed the taken parcel. The Court found "that the same reasoning that allows for a taking of land by permanent occupation allows it for a right of way taken in the same manner." 217 U.S. at 339. (Mining/Oil Company or Organization, Spokane, WA - #16091.52100)

NMA [National Mining Association] notes that if the proposal acts to deny or restrict access to valid existing mining claims or leasable minerals under contract, or private mineral estates and reservations then the proposal does pose the risk of taking Constitutionally-protected property. (Mining/Oil Company or Organization, Washington, DC - #43583.52100)

Public Concern: The proposed rule should comply with the First Amendment.

The proposed rule constitutes the favoring of a religion, in violation of the First Amendment. (Individual, Albuquerque, NM - #16182.52000)

Public concern: The government should limit its land ownership to only five percent of the land.

America belongs to us, the average citizen. God made this land, not the Government. Government ownership is ILLEGAL, except for the mandated 5%!!! (Individual, Dayton, NV - #2916.42000)

Public Concern: The proposed rule should comply with the Tenth Amendment of the Constitution.

Your policy of closing roads is unconstitutional under the 10th Amendment and also under the commerce clause. We Americans are your employer and control your actions! (Individual, Dimondale, MI - #13406.52200)

Public Concern: The Forest Service should honor states' rights.

The Governor of Alaska, the Alaska Legislature and Senate, and all three of Alaska's congressional delegation are opposed to the roadless initiative in Alaska. Most of the States impacted by the initiative directly are against the initiative. What has happened to states' rights? At a minimum, how is it that Washington D.C. can ignore us and let bureaucrats and people that don't even live here make major decisions [which] significant impact our lives. It is like having us determine how the streets of New York should be cleaned up. We don't have a clue because we don't live there. We have a right to grow into a productive State and not be sentenced to become a huge wilderness area benefiting only the young. (Individual, Ketchikan, AK - #199.52200)

The proposed rule violates existing state land endowments with the federal government and constitutional states' rights.
Federalism is arrogantly ignored and dismissed rather than meaningfully addressed. (Business, Wallace, ID - #17632.50000)

TO REGULATE AIR AND WATER QUALITY

The second part of the proposed regulation, Section 294.13, raises serious considerations about compliance with state primacy provisions under federal laws, and federalism concerns. The proposed regulation requires the local supervisor to evaluate the quality and importance of "soil, water and air" and "sources of public drinking water" when examining unroaded areas in future plan revisions. The proposed regulation does not contain any further criteria about this evaluation. This evaluation is then used to determine "management protections" and the "level of such protection" in the subsequent plan, such protections to further the conservation of roadless areas.
The state is the entity given primacy, under the terms of the Clean Air and Clean Water Acts and a delegation from the EPA, for air and water quality. These laws provide for permits for any type of disturbance or other act which may cause a discharge into the air or waters of the state. The state is responsible for other air quality considerations, including haze. Many of the western states have agreed to the provisions of the Western Regional Air Partnership (WRAP), a regional effort to combat regional haze. The state cannot imagine how the local supervisor can make this evaluation without the expertise of the state personnel in air and water quality. The proposed regulation does not provide for any consultations, memoranda of understanding, or any communications as these evaluations are being considered. (State Elected Official, Salt Lake City, UT - #43918.50000)

TO REGULATE WILDLIFE

Further, because the state has primacy in the area of wildlife management, questions of federalism are raised when the proposed regulation purports to have the local managers' evaluations of wildlife habitat. Again, the proposed regulation does not provide for any consultations, memoranda of understanding, or other communications to insure that the state's primacy with wildlife issues is given full consideration. (State Elected Official, Salt Lake City, UT - #43918.50000)

TO MANAGE WATERSHEDS

The proposed rule and other Alternatives will not resolve the water management problems associated with these undefined roadless areas. In the first instant, water is under the primary jurisdiction of the State. The roadless area rule could impair and even abrogate the States' ability to manage its waters. For example, if a wildfire occurred, the denuded land could cause significant impacts upon the quality of the water. Of no less importance, the failure to maintain the appropriate amount of trees and undergrowth in these roadless areas can cause a significant reduction in the quantity of water. (County Agency, Glenwood, NM - #13909.53300)

TO MANAGE TRANSPORTATION SYSTEMS

In the second instant, roads allow for many management needs including, but not limited to, those under the primary jurisdiction of the State. Among other interests, roads provide necessary management access for fire control, search and rescue, other emergency services, management of fish and game, logging and thinning of timber, fuel wood control, grazing, and water quantity and quality management. There is no provision of law, rule or regulation that can be so construed as to prejudice the authority and claims of the State. (County Agency, Glenwood, NM - #13909.53300)

TO MANAGE SCHOOL TRUST LANDS

Authorities granted to local Forest Service officials under the Roadless Area Conservation DEIS do not take into consideration the fact that Idaho's right to manage "endowment lands" and "school trust lands" granted at a time of statehood admission are not to be subordinated to federal actions which violate the 10th Amendment of the United States Constitution. (State Elected Official, Albion, ID - #44351.52200)

Public Concern: Congress should have the only decision-making authority over federal lands pursuant to the property clause of the Constitution.

CONGRESS HAS ULTIMATE AUTHORITY OVER FEDERAL LANDS PURSUANT TO THE PROPERTY CLAUSE OF THE U.S. CONSTITUTION. SEE KLEPPE V. NEW MEXICO, 426 U.S. 529 (1976). To the extent that the Forest Service has authority to take nationwide actions, the RPA, 16 U.S.C. 1601-14, and the Contract with America Act, 5 U.S.C. 801-808, provide the mechanisms for informing Congress and obtaining its acquiescence before taking significant actions at the national level.

Congress exercised its authority over national-level decisions regarding the National Forest System in the RPA. The Forest Service, by not fully informing Congress in advance (in either the Assessment, the Program, the Program report replacement under the Government performance and Results Act, or the Statement of Policy) that a major roadless area initiative affecting 28% of the National Forest System would be proposed, has acted contrary to at least the spirit of 16 U.S.C. 1601, 1602, and 1606.

Further, the Contract with America Act requires a report to Congress on this rulemaking "before a rule can take effect." 5 U.S.C. 801(a). If the rulemaking is determined to be a "major rule," the rule does not take effect until 60 days after the report has been submitted to Congress, during which time Congress can disapprove the rule. ID. [sections] 801(a)(3), 802. Thus these provisions provide another opportunity for Congress to exercise its Property Clause powers over allowed uses of National Forest System lands. (Business, Washington, DC - #29962.52000)

The Siskiyou County Farm Bureau questions the Constitutionality of this initiative process. The USDA Forest Service is a creature of Congress, deriving its power solely from the delegation of authority by Congress. The U.S. Forest is acting beyond the scope of its authority in attempting to redefine its own management mission as applies to roads, preempting that which is established in law.
Under "separation of powers," the Executive has not been Constitutionally delegated the authority to make law. That authority has been delegated by the people of the United States to Congress. An Administrative initiative, such as is proposed, could only be interpreted as advisory to Congress. The USDA has not the capacity to recognize an Executive initiative as a directive having the force of law. Neither does it have authority to act under its own initiative to promulgate regulations that supercede various Acts of Congress.
The duties and responsibilities of the Secretary, as executive of the department, are controlled by federal law and are subject to the supervision of Congress. The Administration may impose only duties of a purely political nature upon an executive office. [Kendall v. U.S. Ex Rel. Stokes, 37 U.S. 524 (1838).] The Department is empowered by Congressional Act to carry on governmental activities. That power is strictly circumscribed by the authority granted. [Stark v Wickard, 321 U.S. 288 at 309; Quaker Oats Co. v. Fed. Security Administrator, 129 F.2d 76, 80, 7th Cir., 1942; reversed on other grounds at 318 U.S. 218, 63 S.Ct. 589, 1943.] The Court echoed these principles in Soriano v. United States, 494 F.2d 681, 9th Cir., 1974: "An administrative agency is a creature of statute, having only those powers expressly granted to it by Congress or included by necessary implication from the Congressional grant," 494 F.2d, at 683. (Business/Business Association, Yreka, CA - #43494.52000)

3.1.2 Federal laws

A large majority of respondents who cite federal laws do so in opposition to the proposed rule. Many of their comments are detailed and with some exceptions tend to emphasize procedural issues.

Many respondents are concerned with several alleged violations of the Administrative Procedures Act (APA). Alleged violations of APA include failure to provide consistency findings, disclose critical facts, present a full range of alternatives or even a fair and balanced assessment of the alternatives. Respondents also maintain that the public comment period was too short and that that fact, combined with the unavailability of documents, made public comment difficult. Several individuals further assert that the Forest Service did not provide critical facts or sufficient data for meaningful public comment. A few respondents warn that ignoring all of this evidence will render the Forest Service's actions arbitrary and capricious. In addition, many respondents accuse the Forest Service of violating APA's rules on ex-parte communication. Some respondents even claim these ex-parte communications occurred with "small select groups of environmentalists." They state the rules on ex-parte communication were further violated when these communications were not included in the public record.

In addition to concerns about alleged violations of APA's rules on ex-parte communication, many respondents are concerned with possible violations of the Federal Advisory Committee Act (FACA). These respondents state FACA was violated when the Forest Service used "unchartered" groups of environmentalists "to the exclusion of all others." One remedy suggested by these individuals is for all communication with private parties that occurred within the last year to be included as an appendix in the final rule. A few other respondents suggest the Forest Service take advantage of its authority under FACA to charter an advisory committee that will provide "balanced representation of outside interest groups."

One individual is concerned that the present legal "crazy quilt" of laws and regulations, coupled with the Equal Access to Justice Act, encourages "low-risk" lawsuits against the Forest Service. Such litigation imposes high costs in both time and money. This individual suggests mandatory arbitration before going to court. Many respondents are also concerned over alleged violations of the Freedom of Information Act (FOIA). A few individuals cite specific instances where they are still waiting for responses to FOIA requests made early in the comment period.

The proposed rule should avoid violations of the Civil Rights Act, some writers state, by extending the same considerations to "all generational rural cultures and peoples" as are extended to Native Americans. A few individuals express concern that the proposed rule will violate the Americans with Disabilities Act (ADA) by closing roads, thereby limiting access to people with disabilities. Some respondents even suggest building more roads and trails that accommodate wheel chairs. A January 2000 court ruling states "that the right to use National Forests for outdoor recreation 'constitutes a legally protectible interest under the National Outdoor Recreation Act of 1963.'" A few individuals claim this must also protect OHV roads and trails that may be considered for closure under the proposed rule.

Several respondents encourage compliance with the Contract with America Act, which provides "another opportunity for Congress to exercise its Property Clause powers over the allowed uses of National Forest System lands." This would require a report to Congress about the proposed rule "before a rule can take effect." A few respondents also state that a failure to notify Congress of the proposed rule prior to adoption would violate the Government Performance and Results Act. One individual concerned with access feels the Forest Service would violate the Surface Transportation Assistance Act if the proposed rule denies "reasonable access" to inholders. A few individuals suggest the bulky documents of the Draft EIS do not comply with the Paperwork Reduction Act.

Section 3.1.2.1 covers concerns about federal laws that have specific economic significance. Many respondents assert that the proposed rule is in violation of the Regulatory Flexibility Act (RFA). These individuals cite many inadequacies in the Initial Regulatory Flexibility Analysis (IRFA), including absence of "a succinct statement of the objectives of, and legal basis for, the proposed action; a description of and, where feasible, an estimate of the number of small entities to which the proposed action will apply;" hard data or facts substantiating assumptions; and exhibits as well "blatant omissions." A few respondents also claim the IRFA lacks an alternative that would "minimize any significant economic impact of the Proposed Rule on small entities." One group claims the IRFA should include an analysis of the effects of the proposed rule on motorized recreation. Many other groups are concerned the proposed rule underestimates impacts on the timber and mining industries. Respondents who assert the proposed rule violates RFA agree the Forest Service should complete an economic impact analysis and honestly analyze "the impacts of their proposed rules on small entities," rather than thinking of reasons "why they do not have to comply with RFA." The economic impact analysis recommended by many respondents should include a comprehensive or cumulative impact analysis of the three pending Forest Service proposals. In addition, if the economic analysis determines a negative effect on small entities, the federal government should compensate rural communities for lost economic benefits, some respondents advocate. One federal agency asserts that all forest level decisions regarding the proposed rule should require a regulatory flexibility analysis.

The Regulatory Flexibility Act is closely related to the Small Business Regulatory Enforcement Fairness Act (SBREFA), and many of the cited violations of the two laws are similar. Many individuals feel the proposed rule violates SBREFA, which also "requires agencies to examine and mitigate for the impact a proposed rule will have on small entities." Furthermore, a few respondents state that separating concurrent Forest Service proposals has prevented adequate documentation of the cumulative economic effects. A few individuals are concerned the proposed rule violates the Unfunded Mandates Reform Act, as the proposed policy is not "addressed in the FY 2001 Forest Service Proposed Budget." One group suggests the proposed rule should either be "funded for implementation through appropriated funds" or removed.

Public Concern: The Forest Service should comply with the Administrative Procedures Act.

The undue influence that the Clinton administration and the Forest Service have granted to special interests has violated the Administrative Procedures Act. (Municipal Association, Price, UT - #85.55200)

In order to assure the responsible official and the public that all actions are consistent with the forest plan, a finding of consistency must be part of each decision document." Forest Service Handbook 1909.12 -- Land and Resource Management Planning Handbook [section] 5.4.1 ("Planning Handbook"). Such a consistency determination also would be required by the Administrative Procedure Act ("APA"), so that a court can assess compliance with the NFMA. MOTOR VEHICLE MFRS. ASS'N V. STATE FARM MUTUAL, 463 U.S. 29, 48-49 (1983). The Forest Service's failure to provide a consistency finding on the rulemaking also violates the NFMA and APA. SIERRA CLUB V. MARTIN, 168 F.3d 1, 4-5 (11th Cir. 1999). (Timber Company or Association, Eugene, OR - #15879.53800)

The DEIS violates the APA because it purposefully fails to disclose critical facts to the public, fails to present a full range of alternatives, and fails to present a fair and balanced assessment of alternatives thereby deceiving the public in violation of APA. (Individual, Whitefish, MT - #30417.55200)

Against this backdrop of political chicanery, the Companies must protest, in the strongest terms, the Forest Service's decision to so hastily rush this roadless rule to conclusion, despite significant barriers to informed commentary resulting from vaguely defined and complicated boundaries of the areas affected by the rule. The short period allowed for public comment, combined with the general unavailablility of the documents to most of the public, and the vagueness and complexity of boundaries of the areas to be covered, leaves many parties unnoticed, or at the very least not adequately noticed, of the potential effect of the proposed rule. Such flawed notice is in direct contravention of the Administrative Procedure Act ("APA"). The proposal is truly a case of "the devil is in the details." The failure to adequately define the scope of the proposed rule and to provide sufficient time for analysis and comment, we think, also violates the fundamental notice provisions of the APA by precluding the informed and rigorous debate which lies at the very heart of the APA's notice and comment requirement. (Mining/Oil Company or Organization, Washington, DC - #52224.55200)

There is just too much evidence for the Forest Service to ignore as it conducts its rulemaking procedure. A decision otherwise would be "arbitrary and capricious" and violate sections 501 of the Administrative Procedures Act which governs the agency's rulemaking. (Individual, Bloomington, IN - #26023.50000)

BY PROVIDING SUFFICIENT DATA FOR MEANINGFUL PUBLIC COMMENT

THE AGENCY FAILED TO PROVIDE SUFFICIENT DATA TO PROVIDE OPPORTUNITY FOR MEANINGFUL PUBLIC COMMENT. Section 553 of the federal Administrative Procedures Act requires that an agency proposing a rule must provide an opportunity for interested parties to participate in the rule making through submission of written data, views, or arguments. In order to provide such comments, however, those parties must have access to sufficient information to determine how the proposal will impact their interests. (Mining/Oil Company or Organization, Denver, CO - #29952.55200)

BY FOLLOWING RULES ON EX-PARTE COMMUNICATION

The Forest Service Violated the Administrative Procedure Act Prohibition on Ex Parte Communications During the Development of its Roads Policy. . . . when an agency conducts a rule making with public hearings, the APA places a prohibition on "ex-parte communication relevant to the merits of the proceeds" between interested persons outside the agency and agency employees who are or may reasonably be expected to be involved in the decision (5 U.S. C. 557). Further, if such ex-parte communication occurs, agency employees must include in the public record "all such written communication; memoranda stating the substance of all such oral communications; and all written responses, and memoranda stating the substance of all oral responses." ID. The prohibition on ex-parte communications "shall apply beginning at such time as the agency may designate, but in no case shall they begin to apply later than the time at which a proceeding is noticed for hearing" id. (Individual, Centerfield, UT - #28291.55200)

In conjunction with the roadless areas review, in early 1998 the Forest Service commenced two associated rule-makings: an advanced notice of proposed rule-making on a transportation plan and a proposed interim rule prohibiting road construction. In conjunction with these rule-makings, the Forest Service held meetings and otherwise solicited public comments on the proposals. The interim rule on roadless areas was finalized a year later and the transportation rule is still pending. However it is now clear that while the Forest Service was receiving written comments on its proposals and holding public meetings on its proposals, it was meeting - in secret - with a small, select group of environmentalists with a direct interest in the outcome of the roadless area review and transportation policy. Yet, the public record for the rule-makings does not show that these ex parte communications ever occurred. (Mining/Oil Company or Organization, Denver, CO - #29952.55200)

BY NOT BEING ARBITRARY

THE RULEMAKING UNLAWFULLY AND ARBITRARILY SETS A MANDATORY NATIONWIDE PRESCRIPTION. The ironclad rule that "all inventoried roadless areas must remain roadless in perpetuity" is contrary to the type of localized consideration required by MUSYA, the NFMA, and the APA. It is also contrary to the congressional consultation that the RPA requires before the Forest Service can take such a significant nationwide action.

A. THE PERSUASIVENESS OF WHETHER A PARTICULAR ROADLESS AREA SHOULD BE PRESERVED FOR PRIMITIVE RECREATION IS QUITE DIFFERENT BETWEEN: (1) A SITUATION WHERE A NATIONAL FOREST LOCATED NEAR AN URBANIZED AREA PROVIDES THE ONLY OPPORTUNITY FOR SOLITUDE AND PRIMITIVE RECREATION; AND (2) A SITUATION WHERE THERE ARE PLENTIFUL OPPORTUNITIES FOR PRIMITIVE RECREATION IN WILDERNESS AREAS AND OTHER AREAS IN A WESTERN NATIONAL FOREST AND ON SURROUNDING BLM LANDS. The ironclad rule that all roadless areas must be kept roadless in perpetuity is arbitrary because it fails to distinguish between these two different situations.

For example, the agency's own DEIS states: "The appropriate balance between motorized and non-motorized dispersed recreation use is highly variable throughout the country and dependent on distinct social and environmental conditions; and, therefore is best decided at the local level." DEIS at S-38. The national rulemaking arbitrarily ignores this sound advice, by treating all inventoried roadless areas the same. (Timber Company or Association, Eugene, OR - #15879.51000)

Public Concern: The Forest Service should comply with the Federal Advisory Committee Act.

These violations of FACA are especially noteworthy given the USFS's own regulations in 36CFR219 clearly specify an interdisciplinary approach to USFS resource and policy planning at the local level. (County Agency, Eurkea, NV - #17268.53800)

THE FOREST SERVICE VIOLATED THE FEDERAL ADVISORY COMMITTEE ACT BY RELYING ON ADVICE FROM AN UNCHARTERED FEDERAL ADVISORY COMMITTEE. (Mining/Oil Company or Organization, Denver, CO - #29952.55000)

ECPLAC also notes that in a "Preliminary Staff Review" of the US House Committee on Resources, dated February 18, 2000, that the USFS appears to be in violation of the 1972 Federal Advisory Committee Act. As stated in the Preliminary Staff Review, a recent memorandum from the Chief of the USFS on Oct. 2, 1995 warns: "no group can become a preferred source of advice for the agency without sparking FACA concerns." The Preliminary Staff Review shows that the USFS did, in fact, prefer the counsel of a small select group of environmentalists to the exclusion of all other users of USFS lands. Further, the USFS gives ample evidence that the spirit and letter of FACA was not followed when the list of references for the CBA is examined. In a list of 50 references, only one cited source could be found that might reflect input from an affected industry or economic sector when there are no fewer than four extractive economic sectors which clearly have a large economic interest in this policy and several other groups of users of the USFS lands who were not consulted at all. Clearly, there has been little consultation or input sought from the spectrum and a preference for only one point of view has been exhibited, which is clearly in violation of FACA. (County Agency, Eureka, NV - #17568.55000)

Since there is some question as to the extent that the proposed roadless policy was drafted by a non-FACA chartered group, we request that all communications with private parties or other non-Forest Service agencies that have occurred within the past year be disclosed as an appendix to a supplemental environmental document. (County Agency, John Day, OR - #16087.55000)

I have read that the Blue Ribbon Commission and other ORV organizations as well as the State of California have been denied participation in the Forest Service roadless rulemaking effort. Chief Dombeck, how can you deny, as I hear you have, that you are in violation of FACA? (Individual, Annabella, UT - #43212.50000)

BY OBTAINING BALANCED REPRESENTATION FROM OUTSIDE INTEREST GROUPS

The Forest Service has violated the Federal Advisory Committee Act. The Forest Service should have availed itself of the authority to use the FACA and formally chartered an advisory committee which would have ensured balanced representation of outside interest groups and public notification of all proceedings. Instead you relied on the advice and recommendation of only representation of the environmental community provided behind closed doors. (County Agency, Manti, UT - #43551.55000)

It is clear that if the Administration wants to go through with this initiative they must start from scratch and not violate the law in doing so. If they want an advisory committee, then form one legally. . . . This does not mean meet in secret with members of only the environmental community, violating not only FACA, but internal policy as well. (Individual, Aztec, NM - #50004.50000)

Public Concern: The Forest Service should use other methods of dispute resolution.

One of the outgrowths of the "crazy quilt" of law, regulations issued pursuant to law, and case law coupled with the consequences of the Equal Access to Justice Act is a constant tattoo of legal actions aimed at FS actions. Paying litigants to sue certainly encourages legal action. Win or lose, these legal actions impose significant costs in time and money on the FS (i.e., the taxpayers). Conversely, when the litigants win, the issue is clarified and can guide future activities. In such cases, the litigants have done themselves, society--and the FS--a service. In such cases, the

litigants should be fully compensated for the costs of preparing and trying the case. The same principle should apply when the FS, faced with likely loss, "settles" a case with a litigant. However, when the litigants simply lose, they are sometimes compensated. And, most commonly, the litigants, when they lose, do not pay the FS for costs incurred in defense. Events (i.e., one can learn from past "mistakes" in judgment") have produced a situation wherein the Forest Service is winning a higher and higher percentage of lawsuits. However, given the circumstances of low-risk lawsuits, the rate of lawsuits has not diminished. Why? First, the risk to those who litigate is low, and the chances of a "payday" are great. Second, there is significant "harassment value" in pursuing a litigation strategy that diverts agency resources away from other uses and, ordinarily, produces significant delay in the proposed management action. Third, there is always the chance that considering the monetary and time costs, the agency will both negotiate a solution and pay the litigants' cost. Appeals and lawsuits are pursued in high numbers and are now considered as a routine cost of doing business. In fact for many, that is their business. This is simply too slow, too haphazard, and too expensive to be a satisfactory mechanism to produce solutions to disputes. I suggest that such disputes be taken to mandatory arbitration before it is possible to go to court. And, when cases go to court the loser should pay the costs of the winner. It seems likely that one or both…actions would dramatically reduce litigation. (Timber Association, Medford, OR 13658.50000)

Public Concern: The Forest Service should comply with the Freedom of Information Act.

I believe that the Forest Service proposed rule for roadless areas is invalid and should stop. Current procedures have not been followed including…The Freedom of Information Act…(Individual, Santa Fe, NM - #9442.50000)

Public Concern: The proposed rule should comply with the Civil Rights Act.

Page 3-202-203's concern with Native American treaty tribes' traditional use of National Forest Lands is laudable, but hypocritical in terms of excluding non-recognized Indian and mixed-European non-Indian rural minority rights and traditions from the same consideration. Paragraph 2 states, "Use of these sites may extend to people(s) who wish to exercise traditional activities, but who have relocated from their aboriginal areas due to circumstances or by personal choice. In some instances an Indian band may have so few surviving members that documenting continued use as required by National Historic Preservation Act may be problematic, and a contemporary use would be requested." While such considerations are good, they must be extended to all generational rural cultures and peoples in order for this DEIS to be compliant with the Civil Rights Act. (Business/Business Association, No Address - #54308.55000)

Public Concern: The Forest Service should comply with the Americans with Disabilities Act.

You will be expected to comply with the Americans with Disabilities Act. (Individual, Flagstaff, AZ - #916.55100)

By closing this you are preventing people who are unable to walk from ever seeing or using this area. With the emphasis on the ADA I would believe as much area as possible should be left to development for less fortunate people who would like to see the country.
Leaving this land available for recreation, resources, and use by the physically impaired seems like the proper use of the land. By building roads and trails that accommodate wheelchairs we open the land to everyone. (Business/Business Association, Neihart, MT - #3421.55100)

If forced out of the Alaskan forests by the phony Bill Clinton legacy, I plan to seek court action under the American Disabilities Act. (Individual, Chugiak, AK - #16590.55100)

Public Concern: The proposed rule should comply with the National Outdoor Recreation Act.

On January 18, 2000, Judge Conti ruled that the right to use National Forests for outdoor recreation "constitutes a legally protectible interest under the National Outdoor Recreation Act of 1963."
Therefore an Off-Highway Vehicle user has a legally protectible right to use the National Forests and BLM lands for OHV recreation. And, if this right is legally protectible, so are the Off-Highway Trails which provide for that right. (Individual, Anaheim, CA - #16721.51000)

Public Concern: The Forest Service should comply with the Contract with America Act by providing a report to Congress.

The Contract with America Act requires a report to Congress on this rulemaking "before a rule can take effect." 5 U.S.C. 801(a). If the rulemaking is determined to be a "major rule," the rule does not take effect until 60 days after the report has been submitted to Congress, during which time Congress can disapprove the rule. ID. [sections] 801(a)(3), 802. Thus, these provisions provide another opportunity for Congress to exercise its Property Clause powers over allowed uses of National Forest System lands. (Timber Association, Medford, OR 13658.50000)

Public Concern: The proposed rule should comply with the Government Performance and Results Act.

The Forest Service, by not fully informing Congress in advance (in either the Assessment, the Program, the Program report replacement under the Government Performance and Results Act, or the Statement of Policy) that a major roadless area initiative affecting 28% of the National Forest System would be proposed, has acted contrary to at least the spirit of 16 U.S.C. 1601, 1602, and 1606. (Timber Association, Medford, OR 13658.50000)

Public Concern: The Forest Service should comply with the Surface Transportation Assistance Act of 1978 by granting access to inholders.

This Federal Regulation (36 CFR part 212) does more than merely authorize the Chief to grant access to National Forest lands, it states that he "shall" grant access to inholders. The Roadless Area Proposal would directly contradict the Surface Transportation Assistance Act of 1978 (23 U.S.C. 210, 205), which governs federal funds to be used for forest highway, forest development roads and trails, as inholders could be denied reasonable access to their lands. (County Agency, Duluth, MN - #17287.90310)

Public Concern: The proposed rule should comply with the Paperwork Reduction Act.

The DEIS and the associated proposed rules were published by the Forest Service for the general public to make comments to very important management alternatives that were to be analyzed in the DEIS. However, we find that these bulky documents are not in compliance with the Paperwork Reduction Act, as promulgated by the Clinton-Gore Administration, pursuant to their Reinvention of Government initiative. (Business/Business Association, Beaverton, OR - #52230.55300)

3.1.2.1 Economic Acts

Public Concern: The Forest Service should comply with the Regulatory Flexibility Act.

If the USFS proceeds to take final action under any of the referenced proposals without analyzing adequately the impacts on small entities, NWMA is prepared to challenge the final rule in court. (Business/Business Association, Beaverton, OR - #52230.50000)

The regulatory Flexibility Act ("RFA") requires administrative agencies to consider the effect of their actions on small entities, including small businesses, small non-profit enterprises, and small local governments. See 5 U.S.C. [section] 601, et seq. The purpose of the RFA is to enhance agency sensitivity to the economic impact of rulemaking on small businesses and to ensure that alternative proposals receive serious consideration at the agency level.
Judicial review under the RFA was created precisely because of complaints that "agencies have given lip service at best to RFA." See 142 Cong. Rec. S3242, S3245 (daily ed. Mar. 29, 1996). Yet, it is precisely that type of cavalier treatment of the requirements embodied in the RFA that the Forest Service exhibits in its analysis of the roadless area proposal. (Mining/Oil Company or Organization, Washington, DC - #52224.55400)

BY CORRECTING INADEQUACIES IN THE INITIAL REGULATORY FLEXIBILITY ANALYSIS

The IRFA is deficient in a number of other respects. The RFA requires "a succinct statement of the objectives of, and legal basis for, the proposed action; a description of and, where feasible, an estimate of the number of small entities to which the proposed action will apply." The IRFA is devoid of any attempt to satisfy either of these statutory requirements. The IRFA does not contain a statement of the legal basis for the proposed action. THE REASON IS SIMPLE: THE AGENCY LACKS STATUTORY AUTHORITY FOR THIS RULEMAKING AND IS FULLY AWARE OF THIS FACT. (Business/Business Association, Beaverton, OR - #52230.55400)

Neither the Cost-Benefit analysis nor the Initial Regulatory Flexibility Analysis meet the letter or intent of the RFA. The IRFA is seriously flawed in many respects. The overall credibility of IRFA is seriously diminished by (1) the notable absence of hard data or facts substantiating the many assumptions used throughout this and the other related documents, and (2) blatant omissions.
The IRFA fails to consider mineral exploration and mining as distinctly different sectors of the mining industry. There is no meaningful discussion of probable economic impacts to prospectors, exploration geologists, grassroots exploration companies, junior exploration companies, and industrial mineral operations in either the IRFA or the Draft Environmental Impact Statement.
A regulatory climate that restricts exploration will ultimately bring about a significant downturn in future mineral production. The proposition that one can explore for minerals and develop a mine without roads for ingress and egress defies common sense. A PROHIBITION ON ROAD BUILDING IS A PROHIBITION ON MINING. Thus, the adverse economic impacts associated with the proposed rule have been substantially underestimated. (Mining/Oil Company or Organization, Spokane, WA - #16091.90010)

The RFA further requires a description of any significant alternatives to the proposed rule which accomplish the stated objectives of applicable statutes and which minimize any significant economic impact of the proposed rule on small entities. The Forest Service did not consider several other obvious alternatives that would accomplish the objectives of the proposed rule, but would have protected small entities. These are temporary roads; well-maintained roads; privately maintained roads; and recognizing RS 2477 roads. (Mining/Oil Company or Organization, Spokane, WA - #16091.55400)

Thus, the "trigger" mandating an initial regulatory flexibility analysis is not, as the USFS asserts, whether the proposed rule directly regulates small entities. Rather, the question becomes: is it a federal rule that requires public comment under the Administrative Procedure Act, Section 553 or any other provision of law, that will have a significant economic impact on a substantial number of small entities? The answer in this case is a resounding YES. (Business/Business Organization, Beaverton, OR - #52230.53400)

BY ANALYZING THE IMPACTS ON MOTORIZED RECREATION BUSINESSES

I [Public Lands Director of the Blue Ribbon Coalition] am focusing my comments on the failure of the agency to include in the draft an analysis of the impact of the proposed rule on small entities in the recreation related business sector, specifically motorized recreation. While the agency did do an Initial Regulatory Flexibility Analysis (IRFA), information from recreation and motorized recreation was missing. The agency should have been aware that this information was available. They did consult with the Office of Advocacy, Small Business Administration on including an IRFA in the draft. I provided Jennifer Smith of the Office of Advocacy, who was at that time a liaison with the agency, with some brief data in a fax on February 24, 2000 (enclosed). Following up, I asked if this was the kind of information that would be pertinent. She said it was. I stated that upon request, I could provide more. I heard nothing further. (Wise Use Organization, Idaho Falls, ID - #18654.55400)

VIOLATION OF THE REGULATORY FLEXIBILITY ACT
The DEIS and related FPR/RMR did not adequately analyze economic impacts to ORV/OSV dealerships and ORV/OSV related tourism (see exhibit B). According to testimony given by Adnea Cook, public lands director for the Coalition, the Forest Service simply issued a general disclaimer for the RMR that there is no economic impact. Cook's testimony clearly shows that most every Western state demonstrates well over $100 million in economic activity from summer and winter ORV/OSV recreation. These figures clearly show that the collective negative economic impacts of the DEIS/FPR/RMR exceed [the] $100 million dollar trigger that constitutes a MAJOR FEDERAL ACTION.
The DEIS should be withdrawn until Congress is given a report on the economic impacts to ORV/OSV related businesses. The Forest Service must acknowledge that the Clinton/Gore forest legacy constitutes a major federal action. (Wise Use or Land Rights Organization, Oakley, CA - #16086.55400)

BY ANALYZING THE IMPACTS ON THE TIMBER INDUSTRY

What will happen to timber employment income generated by the Forest Service timber sale program? Once again the data suggests a terrible impact on local economies and small business. In 1992, when the Clinton Administration took over, the Forest Service reported it generated nearly $4.2 billion worth of direct, indirect, and induced timber employment income from the sale of Forest Service timber. By 1997, the employment income activity had fallen to slightly over $2.0 billion. FY 1999 harvest levels suggest employment income, driven by the Forest Service timber sale program, will fall to a little over $1.8 billion. A 52% reduction in available suitable timber base would decrease the volume harvested in 2000 by 52% and that would decrease the direct, indirect, and induced timber employment generated through the sale of Forest Service timber from an estimated FY 1999 level of $1.8 billion down to approximately $658.4 million. Once again, this exceeds the $100 million level needed to trigger a Regulatory Flexibility analysis. In conclusion, until the Forest Service produces maps that show where the unroaded areas (less than 1,000 acres in size) are located, and articulates whether those areas will be part of the available suitable timber base, a worst case analysis shows annual economic impacts of over $1 billion to rural communities and to small business. As such, the SBA and Congress should demand a full detailed Regulatory Flexibility Analysis. Without the analysis, both the SBA and the Forest Service are exposed to legal challenge. (Timber Company or Association, Eugene, OR - #15879.55400)

Assuming a 52% reduction in the available suitable timber base will result in a 52% reduction in the ASQ, projections can be made regarding (1) future timber sale revenues, (2) the 25% Payments to Counties, and (3) employment income produced as a result of the Forest Service timber sale program. Given existing SBA data on the amount of federal timber purchased by small business entities, one can also project how the roadless policy will impact small business and trigger the need for a Regulatory Flexibility Analysis.
The Forest Service argues that their program should be analyzed based on the amount of timber they currently sell, rather than the amount allowed for in their existing plans. They argue that it is unrealistic to believe Congress will ever fully fund implementation of these forest plans. They argue the SBA and others should complete an analysis based on the recent history, rather than on historic averages or on what the forest plans allow to be harvested. However, the Forest Service has no right under regulation and law to assume the level of congressional funding that will be appropriated. Rather, they must perform their analysis based on their current forest plans. Those plans are the agency's compact with rural America, and rural America deserves to know how this roadless policy will impact them.

The Forest Service also argues that removing the RARE II and other lands from the suitable base will not impact future harvest levels because there is sufficient acreage left to support the Congressionally funded harvest levels. Again, the Forest Service and the SBA cannot presume to know what level of timber harvest a future Congress will, or will not, fund. (Timber Company or Association, Eugene, OR - #15879.55400)

The agency suggests a macro analysis that shows that other landowners may supply timber to the market to replace lost Forest Service timber, and suggests that reduced federal timber sale programs will not impact small businesses because the agency will have access to alternative sources. The agency also suggests that Canada will make up lost timber so that the impacts of their draconian policy proposal will not ripple through the home building industry. 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, precluded 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 proposed macro analysis in the Advance Notice of Rule Making is sophomoric at best, and downright evasive and illegal at worst. (Timber Company or Association, Eugene, OR - #15879.55400)

The volume numbers do not tell the complete story. During the last 7 years, the Forest Service has moved away from the sale of high quality saw timber to a program that offers less valuable small stem material through an increasingly complicated and expensive sale program that requires much more expensive logging systems and equipment. In 1992 the Forest Service generated almost $4.2 billion dollars of timber receipts on a volume of 7.2 billion board feet - an average revenue of $575.54/thousand board feet of timber sold. In FY 1999, the Forest Service timber sale program is estimated to have produced approximately $297.20/thousand board feet in receipts to the federal government on a volume of 2.9 billion board feet. Thus the government has seen a 79% reduction in its timber-generated revenues from FY 1992. That 79% reduction in timber receipts has resulted in an $830.5 million drop in 25% payments to counties. When put in the context of the forest plans, and a 52% reduction in the available suitable timber base, this loss would trigger a Regulatory Flexibility analysis.
If the ASQ and timber sale program experiences a 52% reduction resulting from the roadless policy, Forest Service timber revenues could fall from $577 million in FY 1997 to less than $122 million in FY 2001. This would result in a loss of more than the $455 million to the Federal government, which would translate into a $114 million loss in 25% payments to counties and local governments. This alone should trigger a Regulatory Flexibility Analysis. (Timber Company or Association, Eugene, OR - #15879.55400)

BY ANALYZING THE IMPACTS ON THE MINING INDUSTRY

A substantial number of small mining entities will be affected by this rule. Based on the government's own data, 97% of the coal companies and 98% of the metal/non-metal mining companies are considered small under the Small Business Administration's definition of 500 employees or less. There is no dispute that many small entities currently mine on National Forest lands and will do so in the future. . . . It strains the agency's credibility to say that a rule of this nature will have no direct regulatory impact, particularly when it has generated over 119,000 comments. In addition, the agency's own draft environmental impact statement (DEIS) suggests that some substantial portion of 78 billion tons of coal reserves alone (not to mention other mineral resources) may be sterilized by this roadless proposal. (Mining/Oil Company or Organization, Reno, NV - #15907.54200)

As the U.S. District Court in Florida has keenly observed, agencies must be mindful that even commendable goals like preservation do not excuse violations of the RFA:
Although the preservation of Atlantic shark species is a benevolent, laudatory goal, conservation does not justify government lawlessness.
Southern Offshore Fishing Association v. Daley, 55 F. Supp. 2d 1336 (D.FL 1999)
D. Inadequate Analysis of Small Entities
Even though the RFA does not require mechanical exactitude, it does compel the Secretary to make a reasonable, good faith effort prior to issuance of a final rule to inform the public about potential adverse effects of his proposals and about less harmful alternatives. Such effort was not made on the IRFA. The FS starts with the presumption that it is not required to produce the IRFA under the RFA. This may explain some of the later observations in the IRFA,

which say the agency believes that "the impacts [on small entities] are somewhat unpredictable" and data on them is limited." A proposal to effectively withdraw 42 million acres of public land from use (and possible millions of acres more in the near future) from mining and other industries will clearly have a significant economic impact.
In addition, the agency fails to examine the impacts on other segments of our industry, including, for example, firms that do exploration work. The vast majority of these firms are small entitles, and will be significantly harmed by the rule. Without road access, many of these firms will no longer be able to operate on National Forest lands. The failure to analyze impacts by the agency is error under the RFA. (Mining/Oil Company or Organization, Reno, NV - #15907.54200)

BY PROVIDING A COMPREHENSIVE OR CUMULATIVE IMPACT ANALYSIS

In Segmenting The Roadless Area Initiative Into Three Proposals, The Forest Service Has Not Provided The Comprehensive Or Cumulative Impact Analyses Required By The Regulatory Flexibility Act - As discussed above, the Forest Service's failure to assess the cumulative socio-economic impacts of the three related rulemakings violates NEPA. Similarly, by artificially segmenting roadless area matters into three proposals for separate economic analyses, the Forest Service has also violated the Regulatory Flexibility Act ("RFA"), 5 U.S.C. [sections] 601-12, and the Unfunded Mandates Reform Act ("UMRA"), 2 U.S.C. [sections] 1501-71. Factually, the Forest Service prepared only a short cost-benefit analysis on the road management instructions, and concluded that the RFA does not apply to those instructions. 65 Fed. Reg. 11682, 11686-87. The Forest Service has also claimed an RFA exemption for the forest planning rules. 64 Fed. Reg. 54093. While the Forest Service has prepared an initial regulatory flexibility analysis on the roadless area rule, it does not address the cumulative impacts of the three proposals and the Forest Service has not prepared any UMRA analyses. 65 Fed. Reg. 30285-86. (Timber Company or Association, Eugene, OR - #15879.55400)

We believe that the Forest Service is in violation of the RFA and UMRA if it does not consider the cumulative economic effects of the three interrelated and simultaneously pending proposals. For example, the combination of the roadless area rulemaking's constraints on road construction in uninventoried roadless areas from the time of forest plan revision forward, and the road management instruction's constraints on road construction in the same areas before forest plan revision, will lead to fewer new roads in the future. Where road construction is denied, this has adverse economic impacts on those dependent on the timber, minerals, or other resources which would be accessed by the road. Even where a road can be constructed, the three proposals impose higher processing costs (e.g., the costs of an EIS, increased grounds for litigation) on the Forest Service and private sector. Thus, just as NEPA requires a fair picture of the totality of impacts created by these three proposals, RFA, and UMRA also require a "big picture" analysis of the economic impacts of all three proposals in combination. (Timber Company or Association, Eugene, OR - #15879.55400)

BY COMPLETING AN ECONOMIC IMPACT ANALYSIS

It is interesting to note that in each of the rulemaking initiatives mentioned above, the USFS has taken the position that either the RFA does not apply "Because the proposed rule does not directly regulate small entities," or that the Forest Service is engaged in planning - not regulating, or that the proposed rule will not have a significant economic impact on a substantial number of small entities. It appears that the USFS has spent its time thinking of reasons why they do not have to comply with the RFA rather than honestly analyzing the impacts of their proposed rules on small entities. This very attitude raises serious questions about the USFS's ability, or desire, to make a good-faith effort to inform the public about potential adverse impacts on small entities. It also is apparent from examining the IRFA that the USFS has made little or no effort to identify less harmful alternatives. The USFS either does not understand the requirements of the RFA and SBREFA, or is consciously ignoring those requirements. This is not surprising. (Business/Business Association, Beaverton, OR - #52230.55400)

In 1997, the USFS argued that an amendment to the Tongass National Forest Land and Resource Management Plan was not a "rule" that required an analysis under SBREFA. In a letter dated July 3, 1997…, the Comptroller General reached the conclusion that Land Resource Management Plans and amendments to those plans were "rules" under SBREFA because it prescribes the manner of the policy for managing the Tongass National Forest for the next 10-15 years, set out what type of activities may occur in various sections of the forest, was of general applicability, future effect, and that it implemented, interpreted and prescribed law and policy.

Thus, despite the USFS's assertions to the contrary, there is no question that the Proposed Rule meets this standard and that the USFS must prepare an initial regulatory flexibility analysis and a final regulatory flexibility analysis. (Business/Business Association, Beaverton, OR - #52230.55400)

The Forest Service will tell the SBA it cannot map where the non-RARE II acres are located, so they cannot access how the policy will impact the available suitable timber base, and therefore the likely economic impacts. They will argue they are implementing the policy in two phases and that the second phase will be implemented through local forest plans where local economic impacts can be assessed. They will argue the non-RARE II acres will only be temporarily put off limits until the final forest plan revisions are completed, therefore there is no need to complete a regulatory flexibility analysis.
RESPONSE - This is a slight of hand proposal designed to limit the impact of implementing each phase of the policy, in hopes of avoiding having to do a regulatory flexibility analysis. The bottom line is if the policy is interim, or permanent, the impact on small business will be the same. A short term lack of timber sales will result in the closure of additional small business mills and the economic impacts of the policy will have occurred before the interim policy is assessed in the revisions of the forest plans. It is a fundamentally dishonest approach designed to circumvent the law. (Business/Business Association, Beaverton, OR - #52230.55400)

The Forest Service further argues that they need to only examine the timber sale revenues lost as a result of the proposed roadless area protection policy, but the SBA and Congress should not accept the simple timber sale receipt analysis the agency is suggesting. A regulatory flexibility analysis must also consider the direct economic impacts on recreation, grazing, and mining as well as the indirect and induced impacts likely to result if two-thirds of the national forests are put off limits to motorized access. A risk analysis, which examines the likely increases in uncontrolled wildfire and the costs of fire suppression and property damage, must be included in such an analysis. It is unconscionable for the Forest Service to ignore employment income impacts when they've tracked this information in TSPIRS since 1987. (Timber Company or Association, Eugene, OR - #15879.55400)

BY COMPENSATING RURAL COMMUNITIES FOR LOST ECONOMIC BENEFITS

The Forest Service is avoiding the RFA mandated economic impact analysis because it knows that the impact to small businesses and rural communities will be large and devastating.
The proposed rule, coupled with the roads the Forest Service is proposing to close under related initiatives, will ensure that there is no road to a viable economic future for the hundreds of small rural communities in or near our National Forests. If the federal government wishes to turn its forests into parks, then the people paying the economic and personal price for this policy "about-face" should be made whole. We believe that the RFA and NEPA require that the Forest Service include the obligation to compensate these rural communities in the IRFA and Cost-Benefit analysis. (Mining Association, Spokane, WA - #16091.93730)

Public Concern: Forest level decisions regarding the proposed rule should require a Regulatory Flexibility Analysis.

Advocacy believes that FS should require local FS planners perform an RFA [Regulatory Flexibility Analysis] analysis in drafting future forest plans that implement this rulemaking to assure that the implementation minimizes the economic impact while achieving the goal of preserving the environment. (Federal Agency, Washington, DC, 54012.55400)

Public Concern: The proposed rule should comply with the Small Business Regulatory Enforcement Fairness Act.

The proposed rule is in violation of the Small Business Regulatory Enforcement Fairness Act of 1996, which requires agencies to examine and mitigate for the impact a proposed rule will have on small businesses, small cities and small towns. (County Elected Official, Republic, WA - #43726.50000)

The proposed rule is in violation of the Small Business Regulatory Enforcement Fairness Act of 1996. SBREFA requires agencies to examine and mitigate for the impact a proposed rule will have on small entities (small businesses, small cities, small towns). Under the law, federal agencies are required to determine whether a regulation has a SIGNIFICANT ECONOMIC IMPACT on a substantial number of small entities. Inventoried roadless areas comprise over 54 million acres, or 28% of National Forest system land. (Forest Service Roadless Area Conservation DEIS Volume 1 Page S-1). (County Agency, Republic, WA - #10120.55000)

BY NOT DIVIDING THE PROJECT INTO SMALLER SEGMENTS

Thus, it is our contention that the USFS has purposely divided this very significant action into several parts to avoid its legal responsibilities under the National Environmental Policy Act (NEPA) and the Regulatory Flexibility Act (RFA)/Small Business Regulatory Enforcement Fairness Act (SBREFA). By separating what is, DE FACTO, a single action into subparts and then refusing to properly document the resultant cumulative impacts in an adequately prepared Draft Environmental Impact Statement (DEIS), the USFS has made it impossible for the public to provide meaningful comments on either the overall proposal or any portion thereof. (Business/Business Association, Beaverton, OR - #52230.50000)

Public Concern: The proposed rule should comply with the Unfunded Mandates Reform Act.

The Forest Service has failed to invite the participation of local governments, counties, and conservation districts. This failure also violates the Unfunded Mandates Reform Act of 1995 which states that,
"Each agency shall, to the extent permitted by law, develop an effective process to permit elected officers of State, local and tribal governments to provide meaningful and timely input in the development of regulatory proposals containing significant Federal intergovernmental mandates." (County Elected Official, Sheridan, WY - #51045.54100)

We further find the documents wrought with avoidance and violations of the Clinton-Gore Administration's Unfunded Mandates Executive Order of 1995. The implementation of the Preferred Alternative contained in this DEIS, the proposed Forest Service Planning Regulations, the proposed Forest Service Road and Transportation Policy, as well as the proposed amendment of 36 CFR, Part 294-Special Areas definitions, are all dependent on appropriation of funds. However, none of these proposed policies are addressed in the FY 2001 Forest Service Proposed Budget or in the present draft of the FY 2001 Interior and Related Agencies Appropriations.
This DEIS and the associated proposed rule amendment violates the Forest Service Agency Directive that resulted from President Clinton's Unfunded Mandates Executive Order of 1995. All language in the DEIS that does not adequately address the availability of funds, and all changes in the Forest Plans that are to be revised and/or amended through the Decision resulting from the final EIS requiring additional funds, must be funded for implementation through appropriated funds. Otherwise, all such unfunded mandates must be removed from the documents in deference to this Order and subsequent Agency Directive. (Business/Business Association, Beaverton, OR - #52230.55500)

The Forest Service has determined that: "Pursuant to Title II of the Unfunded Mandates Reform Act of 1995 (2USC 1531-1538),...This proposal does not compel the expenditure of $100 million or more by any state, local, or tribal government, or anyone in the private sector. Therefore, a statement under section 202 of the Act is not required." I do not concur. (State Elected Official, Albion, ID - #44351.55500)

3.1.3 Executive Orders

Several respondents feel their private property within National Forest System Lands could be jeopardized by the proposed rule. These citizens insist, therefore, that the Forest Service withdraw the proposed rule until it has been subjected to analysis pursuant to Executive Order (E.O.) 12630, Government Actions and Interference with Constitutionally Protected Property Rights. "Subjecting the proposal to an honest appraisal and analysis with input from economists and property owners prior to the secretary's conclusion that there is no risk of takings implications," is one suggestion offered to ease property owners' minds.
.
Other members of the public feel the Draft EIS alternatives violate E.O. 12612 on federalism, as "this rulemaking directly affects Receipts Act monies that are due to states and counties." Furthermore, many respondents feel the proposed rule violates E.O. 12866, Regulatory Planning Review. They note that "the USFS evaluation does not standardize measures of costs and benefits using accepted economic practices" a requirement of E.O. 12866. Moreover, some individuals insist that the Forest Service correct previous violations by "providing an assessment of the potential cost and benefits of the proposed regulations on state, local, and tribal governments."

Potential violations of E.O.12898, Environmental Justice, by the proposed rule are of particular concern for numerous citizens. These respondents contend that the Draft EIS fails to offer any alternatives other than the "no action" one that approaches conformance with that order. Others warn, "Any action taken by any Government Agency [must] show or prove a harmless or negligible economic effect on poor or minority communities. The Roadless Conservation area DEIS does not effectively address economic hardship in low income populations." One individual goes even further to proclaim that the Draft EIS fails to recognize healthy economic areas.

Some citizens believe the Forest Service should comply with E.O.11644. They feel the Draft EIS should meet the requirements of this order by proposing alternatives that end OHV abuse in roadless areas. Moreover, the Forest Service's seeming disregard for presidential executive orders has respondents worried that roadless areas will suffer the same riparian damage from OHV use that other areas have.

Several respondents charge that the Forest Service's proposed revision of the Civil Justice Reform Act, which states: "preempts all state and local laws and regulations that are found to be in conflict with it that would impede its full implementation," stretches the power of E.O. 12988, Civil Justice Reform, beyond its limitations. Other members of the public agree that the proposed rule should disclose the effects of the prohibition alternatives per E.O.11593, Protection and Enhancement of Cultural Environment. These individuals contend that "activities associated with road construction, reconstruction and timber harvest" are vital to the discovery of culturally significant sites.

Public Concern: The proposed rule should be withdrawn until it has been subjected to analysis pursuant to Executive Order 12630 and reviewed by Congress.

The contents of the proposal should specifically address the private property rights which exist in the national forest and the impact upon them if the intent of the proposed rule is implemented. Then, once such a new proposal is prepared, it should be subjected to an honest appraisal and analysis pursuant to E.O. 12630, with input as to the analysis from economists and the property owners. That analysis should be presented to Congress for review prior to the secretary's conclusion that there is no risk of takings implications. Until these steps are taken, the proposal should be withdrawn. (Individual, Las Vegas, NV - #15882.72210)

Public Concern: The forest Service should comply with Executive Order 12612.

The DEIS alternatives violate E.O. 12612 as this rulemaking directly effects Receipts Act monies that are due to states and counties. (Individual, Camino, CA - #28691.93740)

Public Concern: The proposed rule should comply with Executive Order 12866.

Furthermore, in this supplemental effort to comply with Executive Order 12866, the Forest Service should correct its other previous violations of this Executive Order and other obligations, including providing an assessment of the potential costs and benefits of the proposed regulations on state, local, and tribal governments. (Mining/Oil Company or Organization, Washington, DC - #52224.63000)

The USFS has not adequately assessed the cost and benefits of the proposed rule. There are no quantitative estimates of the benefits and costs of the proposed rule. Furthermore, the analysis does not include information on plausible alternatives to the proposed rule. By not including quantitative estimates or plausible alternatives it is impossible to evaluate the effects of the rule. THIS IS A FATAL FLAW IN THE PROCESS OF DEVELOPMENT OF THE PROPOSED RULE. The document states that "the benefits of the rule, as proposed, would outweigh the costs" but because no costs are given there is no basis for the statement. A conclusion is given that is not supported by the data. Furthermore, the USFS evaluation does not comply with Executive Order 12866 requirements to standardize measures of costs and benefits using accepted economic practice.
Qualitative Costs and Benefits of Proposed Rule - The basis for the qualitative assertions are unclear and not effectively defined. Mining/Oil Company or Organization, Anchorage, AK - #43215.93100)

Public Concern: The proposed rules should comply with Executive Order 12898, Environmental Justice.

Perhaps most significant the only alternative that approaches conformance to executive order #12898 (Federal Actions to Address Environmental Justices in Minority and Low Income Populations. 49 FED. REG. 7629-1994) is alternative #1. This Executive order mandates that any action taken by any Government Agency show or prove a harmless or negligible economic effect on poor or minority communities. The Roadless Conservation area DEIS does not effectively address economic hardship in low income populations, instead does not even recognize healthy saw mill activity in Gunnison, UT. and Wellsville, UT. (see table 3-54 page 3-213). The DEIS grossly understates the number of jobs directly affected, listing on table 3-44 page 3-218 that 17-28 jobs would be lost if logging ceased on the Manti-La Sal National Forest, while the saw mill in Gunnison Directly employs 42, and their logging operations on their contracts supply jobs to approximately 100 more. I believe this has purposely been left out by the administration to side step this Executive Order12898. Sanpete County Utah has historically been included as one of this Nation's poorest counties. Presently Sanpete County has an unemployment rate of 6.5%. Well above the Utah average unemployment rate of 2.5% and above the National Average of 5.5%. (Individual, Centerfield, UT - #28291.54500)

Of all of the flaws in the DEIS, the most egregious is the failure to incorporate tenets of Environmental Justice into the planning process. Environmental Justice demands that impacts to minorities be included during the initial scooping period. Clearly, air pollution impacts to minority children and the elderly who are most effected by catastrophic wildfires caused by passive management must be included in the DEIS. (Wise Use or Land Rights Organization, Pocatello, ID - #16086.54500)

Public Concern: The Forest Service should adhere to Executive Order 11644 regarding off-road vehicle use, and should determine, at the national level, the appropriateness of such vehicles in roadless areas.

I want to EMPHASIZE THE RESTRICTION OF OFF-ROAD VEHICLES from current roadless areas. The Forest Service does not thoroughly manage ORV use as directed by Executive Order 11644 as amended by Executive Order 11989. The EIS for ORV/OHV use in Montana, North Dakota, and South Dakota illustrates the lack of thoroughness in properly planning for this type of use.
It fails to identify the similarities between continued ORV use in an area and building a road through that area. These similarities include impacts on vegetation, soil, water supplies, and wildlife.
The line between user-created trails and officially designated trails is blurry at best. At what point does the recreation user determine where a trail should be versus the agency making that determination? Your answers to this question are unsatisfactory. I have continually heard and read that you lack the resources to manage ORV use as directed by Executive Order 11644, restrict the areas where it is an acceptable activity.
Executive Order 11644 mandates that ORV use be managed to minimize impacts to soil, watershed, vegetation, harassment of wildlife, and conflicts with other users. The Forest Service has repeatedly failed to meet all of these requirements. For example, the EIS for MT, ND, and SD on page 73 states “None of the alternatives restrict use where OHV user-created trails have been established in riparian areas, areas of unusual erosivity, or areas of critical habitats.” Therefore, the Forest Service violates EO 11644 and the corresponding CFR’s by allowing the user to define the trails. Is this how these sensitive and precious roadless areas will be managed?
Local planning is not appropriate in this situation. A Montanan may not take comfort in knowing that the vast seas of pavement, cement, steel, and other man-made structures exist in Cleveland, but a Clevelander does take comfort in knowing that expanses of natural wild areas exist in Montana. Thus, I would not be comfortable with local planners deciding where and when ORV’s could be used in these roadless areas. (Individual, Missoula, MT - #11290.91612)

The failure of the DEIS to analyze alternatives that would make immediate decisions on ORV abuse, mining, and other destructive activities in roadless areas is appalling. There is no excuse for not analyzing such an alternative. The agency, through executive orders, has ample authority to regulate and end ORV use. The agency has failed since the Nixon and Carter administrations to implement the executive orders and ORV abuse is rampant. (Individual, Moscow, ID - #43481.50000)

Many land managers have been unable to control damage done by Off Road Vehicles (ORVs). The preferred alternative does not address the ORV problem.
Executive orders 11644 (Feb. 9, 1972) and 11989 (May 25, 1977) calls for: MINIMIZE DAMAGE to soil, watershed, vegetation, or other resources on public land. MINIMIZE harassment of wildlife or significant desecration of wildlife habitat. MINIMIZE CONFLICTS between ORVs and other recreational use.
Executive Order 11989 went farther and stated that land managers must immediately close the area to ORVs when the criteria [are] not met.
However, these Executive Orders have been ignored by local land managers as too vague. Had these two orders been followed, the ORV problem would have been resolved at the local level. Therefore the DEIS must give guidelines to the meaning of: Minimize damage, minimize harassment of wildlife, and minimize conflicts must be part of the final DEIS. (Individual, Edmonds, WA - #15074.91612)

Public Concern: The proposed rule should comply with Executive Order 12988.

I emphatically object to that statement on page A24 of the DEIS "Civil Justice Reform Act" wherein it states, "This proposed rule revision has been reviewed under Executive order 12988, Civil Justice Reform. The proposed revision: (1) preempts ALL state and local laws and regulations that are found to be in conflict with it that would impede its full implementation..." Really! You've got to be kidding! What ever happened to the Constitution? (Individual, American Fork, UT – 43642.55000)

Public Concern: The proposed rule should disclose the effects of the prohibition alternatives per Executive Order 11593.

It has been well documented that a majority of culturally significant sites on National Forest lands have been discovered due to activities associated with road construction, reconstruction, and timber harvest. In response to Executive order 11593, charging federal agencies to inventory all lands for cultural properties, the effects of the prohibition alternatives must be disclosed.
RELIEF: The Forest Service must disclose the effects of the prohibition alternatives on Executive Order 11593. (County Elected Official, Basin, WY - #43980.51000)

3.1.4 State and Local Laws

Many state and county officials, wise use groups, and individuals are concerned with access to roads or lands within their boundaries. Some counties have adopted resolutions reserving the right to control road access, stating "access shall not be interfered with or impeded by any agency acting beyond its authority." Other counties claim the right to establish or alter roads "rest[s] solely on the shoulders of the individual Board of County Commissioners," according to state statutes. Similarly, the rights-of-way over the public domain are often codified in state laws, according to one state elected official. The 1905 New Mexico Territorial Act reserved control of roads to the state before the federal government created public lands, writes a county official. Another individual alleges the Forest Service continually encroaches on lands originating from Spanish Land Grants and that the proposed rule will violate the same laws. Along with the concerns about access to roads and lands listed above, some state officials are also concerned with states' valid existing water rights. These officials suggest language should be added to the final proposed rule guaranteeing road access to maintain structures associated with these rights.

Public Concern: The proposed rule should maintain road access as defined by boards of county commissioners.

NOW, THEREFORE BE IT RESOLVED AS FOLLOWS:
1. THAT, the Board of Commissioners for Elko County, Nevada, by and through this Resolution is acting within its sovereign capacity in and for the County of Elko as the Legislative and Administrative body and this Resolution establishes the law and policy on road access within Elko County and that said right of road access shall not be interfered with or impeded by any agency acting beyond its authority.
2. THAT, this Board establishes herein and adopts that the maps filed in the office of the Elko County Recorder, in File#/Map Case 328522, Exhibits A-1 through T-1, Sheets 1-40, properly define the county roads of Elko County, Nevada in and for the benefit of its Citizens, and the public's right of road access and the roads defined and set apart within said maps are not [to] be construed as all inclusive.

3. THAT, Elko County reserves its sovereign right under the law to amend said maps at any time in the future for road expansion when the facts present it is necessary to do such.
BE IT FUTHER RESOLVED, that a copy of this Resolution be transmitted to Elko County Recorder (for proper recording with herein identified maps), each member of the 1997 session of the Nevada Legislature, Governor for the State of Nevada, Nevada's Attorney General, each member of Nevada's delegation to the Congress of the United States, the President of the United States, the Secretary of the Agriculture, all State and Local agencies and local federal agencies.
Proposed by Commissioner Chapman. Seconded by Commissioner Skelton. Passed and adopted this 4th day of February, 1998. Vote: Ayes - R. Llee Chapman, Tony Lesperance, Mike Nannini, Roberta Skelton (County Elected Official, Elko, NV - #13984.57000)

Public Concern: The Forest Service should not usurp local authority to control the establishment or alteration of roads.

COUNTY AUTHORITY

According to Wyoming Statute 24-3-1010 (attached), the Board of County Commissioners may initiate the procedure for the establishment, vacation, or alteration of a county highway. The intent is that powers to vacate roads, maintained or not, rest solely on the shoulders of the individual Board of County Commissioners where applicable. This, not withstanding the Federal Lands Policy and Management Act of October 1976 (as this issue will spill over to BLM lands), or the current federal Administrative rule concerning the new roads moratorium. However, the USFS and Department of Agriculture in the action to obliterate roads, paths or ways, is in essence, under the above conditions, usurping the authorized powers of locally elected government office. (Wise Use/Land Rights Organization, Rock Springs, WY - #2866.57000)

NOW, THEREFORE, BE IT RESOLVED THAT THE BOARD OF ELKO COUNTY COMMISSIONERS DOES HEREBY DECLARE ON THE 17TH DAY OF AUGUST, 1994, THAT:
1. All ways, pathways, trails, roads, county highways, stock trailways, and similar public travel corridors across public lands in Elko County, Nevada, whether passable by foot, beast of burden, carts or wagons, or motorized vehicles of each and every sort, whether currently passable or impassible, that were established in the past, present or may be established in the future on public lands in Elko County, excluding Interstate 80, United States Highways 40, 93 and 93A, and State Highways 225, 226, 227, 228, 229, 232, 233, 278, and 766, are hereby declared to be Elko County public Roads.
2. All rights-of-way to all ways, pathways, trails, roads, county highways, stock trailways, and similar public travel corridors across public lands that are declared to be Elko County Public Roads are the property of Elko County as trustee for the public users thereof and will consist of a 60 foot right-of-way or more if required to accommodate cuts and fills.
3. Elko County hereby ratifies historic practices in the County that public roads have been maintained either by usage or mechanical means and the County will continue this practice in the future. The County's decision not to mechanically maintain any pathway, trail, road, county highway or similar public travel corridor across public lands shall not terminate or affect in any way such road's status as an Elko County Public Road.
4. This resolution hereby incorporates by reference, NRS 405.192(2) which provides: No action may be brought against the county, its officers or employees for damage suffered by a person solely as a result of the unmaintained condition of a road made public pursuant to NRS 405.195.
6. Abandonment or road closure of any Elko County Public Road across Public Lands must follow procedure in accordance with Nevada Revised Statutes and only after public hearings. SEE NRS 405.195.
7. That a copy of this Resolution be forwarded to all interested parties and the Resolution shall be followed by an ordinance.
Proposed this 17th day of August, 1994 by Elko County Commissioner Skelton.
Passed and adopted this 17th day of August, 1994.
Vote: Ayes: Llee Chapman, Mike Nannini, Roberta Skelton, Barbara Wellington. (County Elected Official, Elko, NV - #13984.53500)

STATE AUTHORITY

Indeed, in 1866 Congress granted the state, including the State of South Dakota, rights-of-way over the public domain. The Territory of Dakota accepted that grant in the Highway Act of 1871. See Bird Bear V. McLean County, 513 F.2d 190,192 n.3 (8th cir. 1975). The successor to that law is now codified in South Dakota at SDCL 31-18-1. The grant to the states was "not in the nature of a license, revocable at the pleasure" of the United States, but rather, once the roads were established, "Became vested in the public, who had an absolute right to the use thereof which could not be revoked by the government. . ." Bird Bear (quoting Faxon v. Lallie Civil Township, 163 N.W. 531,533 (N.D. 1917).
It follows, under the foregoing analysis, that there can be no right to create a "roadless area" where there was no Indian reservation in existence in 1866. See Bennett County v, United States, 394 F.2d 8 (8th Cir. 1968); United Staes ex rel Cook v. Parkinson, 525 F.2d 120 (8th Cir. 1975) (undermining Bennett County in certain respects). The same is true with respect to areas in which an Indian reservation no longer exists and in which the land has been restored to the public domain. See Calhoon v. Sell, 71 F. Supp. 990, 1000 (D.S.D. 1998). See also Act of March 2, 1889, 21. In sum, there cannot be a right to create a "roadless area" consistent with the grant made under the 1866 Act. (State Elected Official, Pierre, SD - #27189.50000)

The lands involved were largely acquired during the 1930s. In South Dakota's case, the laws establishing highways had already been in existence for over 60 years. Dak. Terr. Rev. Code ch. 29 1 (now codified at SDCL 31-18-1). Section line highways are "located by operation of law, except where some portion of the highway along such section line has been heretofore vacated or relocated by the lawful action of some authorized public officer, board, or tribunal." Id. This law applies to every section line in the state. State v. Peters, 334 N.W.2d 217 (1983). Even if the highway has never been opened, improved, or traveled, the law applies. State v. Tracy, 539 N.W. 2d 327 (1995). (State Elected Official, Pierre, SD - #27189.50000)

Analysis of the right of the state to maintain rights-of-way on currently existing reservations requires a somewhat different analysis. First, we submit that the state has the right, under the 1866 Act, to create a right-of-way over any free land within a reservation. See generally Bird Bear, supra. Second, the state and local units of government have procured numerous rights-of-way over allotted and trust lands from tribes and from individual Indians on reservations utilizing the statutory procedures. See generally Bird Bear, 513 F.2d at 913. (State Elected Official, Pierre, SD - #27189.56000)

Public Concern: The proposed rule should comply with the 1905 New Mexico Territorial Act.

In New Mexico, the Territorial Legislature did this in 1905 by enacting Section 67-2-1 NMSA, 1978 Compilation. At that time the legislature knew the federal government was going to reserve the public lands in 1906 and thereby create federal lands, closing them to homesteading and assuming control over the roads. As a consequence of the 1905 territorial act the USFS cannot close New Mexico roads that predate the 1906 reservation of public lands to the federal government. Other state laws can also determine characteristics such as the width of the right of way. (County Elected Official, Reserve, NM - #43567.53300)

Public Concern: The proposed rule should adhere to the principles of the Treaty of Guadalupe Hidalgo and Article IV of the New Mexico State Constitution.

This proposed rule also violates the Treaty of Guadalupe Hidalgo and Article IV of the New Mexico State Constitution which recognizes all Spanish Land Grants within the state boundaries. Historically the Forest Service has encroached upon land and is in adverse possession of it with hostility. (Individual, Santa Fe, NM - #9442.50000)

Public Concern: The Forest Service should honor states' valid existing water rights.

While the proposed regulation does have an exemption to the general rule when a "...road is needed pursuant to reserved or outstanding rights..." (294.12-b-3), the state is deeply concerned that valid, existing, state-originated water rights do not fall under this definition. The DEIS only mentions hydrocarbon and mineral rights in its discussion of existing rights, and the supporting specialist report entitled Analysis of Effects For Non-Recreation Special Uses Management asserts that the above mentioned water rights "are not associated with a valid existing right." While some of these water rights predate the establishment of the national forests, most were established afterward and are covered by use permits issued by the Forest Service. These permits were issued, and renewed, in good faith to water right holders whose livelihood depends on the continued exercise of these rights. Under Utah law, a valid water right is classified as real property and entitled to the constitutional protection appurtenant thereto. …Furthermore in the legislation which established the High Uintas Wilderness Area, similar water rights were specifically recognized as valid existing rights and the ability to perform maintenance activities guaranteed. The state engineer is of the opinion that valid, existing , state-originated water rights fall squarely within the definition of "outstanding rights", and the proposed regulation must clearly recognize them. The dams, head gates, pipelines , and canals, (structures) associated with these water rights have historically had land access since the time of their construction. The frequency of equipment access has been so low that the necessity for the access is sometimes forgotten. The above referenced specialist report seems to concur with this view, but reaches the erroneous conclusion that "so few non-recreation special uses are likely to be impacted under these alternatives, the economic effects on businesses, individuals or communities will be minimal." We do not consider the effect on 2390 points of diversion, rediversion, and return to be minimal. To prohibit road reconstruction for maintenance access of equipment to these existing structures in the proposed restrictive areas is contrary to the best interest of the public. When there is a need for access to repair and maintain these structures, the proposed regulation should allow for such, and be amended accordingly. Such a change to the proposed rule would be for the safety of the public, the protection of the outstanding rights of the structure owners, and the protection of the streambeds below the structures. While it is true that some of the smaller structures can be maintained without road access, the larger structures (which pose the greatest danger to public safety) require road access so maintenance can be done in a timely and effective manner. (State Elected Official, Salt Lake City, UT - #43918.90333)

3.1.5 Litigation Rulings

Respondents point to court rulings they believe are applicable to the proposed rule. One individual points to a 1978 decision by the Supreme Court in United States v. New Mexico as evidence that the only primary purposes of National Forest System lands are timber harvest and watershed protection. All other activities are secondary, according to this writer.

Another respondent discusses a lawsuit by the United Four Wheel Drive Association. This person claims that the Forest Service is legally prevented from using the terms roadless and unroaded.

Public Concern: The Forest Service should honor the Supreme Court decision on United States v. New Mexico.

The United States Supreme Court reiterated Congress' declaration in 1978 (United States v. New Mexico), ruling that timber production and watershed protection are the only primary purposes for national forests and that aesthetic, environmental, recreational and wildlife preservation purposes are "secondary purposes." (Business/Business Association, Glen Falls, NY - #2755.53000)

Public Concern: The Forest Service should comply with the court ruling from the United Four Wheel Drive Association lawsuit.

The United Four Wheel Drive Association has won a lawsuit which forces the Forest Service to not use the terms 'unroaded' and 'roadless'. This decision 1) points out the basic fallacy of the initiative and 2) is a harbinger of lawsuits to come. Does the Forest Service really have this kind of money to fritter away on what is basically illegal to begin with? (Individual, North Charleston, SC - #8277.50000)

3.2 Federal Environmental Acts/Laws

This section deals with public concerns that address the potential failure of the proposed rule to comply with federal environmental acts and laws. Section 3.2.1 covers National Environmental Policy Act (NEPA). Section 3.2.2 is titled Endangered Species Act. Lastly, Section 3.2.3 Other, concludes with comments regarding other federal environmental acts and laws.

3.2.1 National Environmental Policy Act

A large majority of opponents of the proposed rule are concerned with violations of the National Environmental Policy Act (NEPA); these alleged violations concern the adequacy of collaboration, cooperation and consultation, the accuracy and adequacy of information provided in the document, the quality of the document, and the adequacy of the alternatives. Some individuals point to flaws in the early scoping process, such as inadequate length of the scoping comment period and a paucity of information provided, as a reason why the proposed rule is invalid. Other respondents insist the "DEIS fails NEPA requirements by not addressing specific legal concerns" submitted during scoping.

Collaboration, cooperating agency status, and consultations are mandates within NEPA violated by the proposed rule, according to several county elected officials. These respondents feel the Forest Service did not adequately involve local stakeholders or consult with local and federal agencies. In addition, some respondents feel the DEIS was not adequately distributed to federal, state, and local agencies. Some respondents are concerned with the timeframe for this project, and feel that by rushing this process, the Forest Service is violating at least the intent of NEPA.

Accuracy of information is another topic relative to NEPA which concerns many respondents. A few individuals contend the Draft EIS contains "blatantly false" information, which is "highly unethical for a public agency" and thereby violates NEPA. The summary of the Draft EIS similarly portrays inaccurate and misleading information, according to a few respondents. Concerns about the adequacy of information include both the amount and quality of information provided. Many respondents are concerned the Draft EIS does not provide sufficient information for the public to "fully evaluate the effects of the proposal." Maps are one area of the Draft EIS found to be particularly lacking in adequate information and several respondents specifically request more detailed maps. One state official accuses the Forest Service of using unpublished data, which is not provided to the public, to develop the proposed rule. Many respondents request the Forest Service "revise the Draft EIS to account for the inadequacies" that "preclude meaningful analysis." Another reason to revise and recirculate the Draft EIS would be to

accommodate significant new information received through public comment, some respondents suggest.

Some respondents feel the Draft EIS fails to adequately describe the affected environment. One county elected official accuses the Forest Service of providing only a "qualitative" analysis that only subjectively describes the effects as "highly likely, slightly," etc. A wide range of respondents feel the proposed rule does not provide "a full and fair discussion of significant environmental effects" of the proposed rule or even of the prohibition alternatives. Instead, they feel that the proposed rule was biased in its presentation of many topics, including road construction and development. One group even requests a risk assessment be completed. The Draft EIS also lacks a site-specific analysis which, according to several respondents, endangers the roadless proposal. They assert RAREII was invalidated largely because "that EIS failed to provide the 'detailed site-specific analysis' of the proposed action's impacts on each roadless area," and suggest the failure to provide that kind of analysis invalidates this proposal as well. Furthermore, site-specific analysis should include impacts on proposed recreational developments, such as ski areas. In addition, some note that the proposed rule does not include a cost/benefit analysis. A few respondents feel a cost/benefit analysis should be included because the proposed rule "will have a huge economic impact."

The direct, indirect and cumulative effects sections of the Draft EIS also lack adequate information, according to some respondents. Several individuals agree that it lacks the "quantitative analysis necessary to determine direct and indirect effects." Furthermore, since there are "no references to state and local land use plans or policies," it would be impossible for the Draft EIS to adequately determine conflicts with state and local land use plans. In addition, other respondents say the proposed rule fails to address the effects on persons with disabilities or to disclose the effects of the alternatives. According to one county elected official, the "Forest Service does not even attempt to address" cumulative effects. Another respondent requests the Forest Service specifically examine the cumulative effects of activities on non-federally owned land in Alaska.

In addition, many respondents agree the Forest Service has "engaged in unlawful segmentation under NEPA" by artificially dividing what is essentially one proposal into three different segments. This creates "confusion in the mind of the public on the three proposals, which frustrates the ability to provide meaningful public comment." Segmentation also eliminates discussion of "the cumulative environmental impacts" of all three proposals as required by NEPA. "NEPA regulations and case law likely require a single comprehensive EIS on the three interrelated actions," and many respondents advocate that the Forest Service provide this.

Some respondents question the overall quality of the document. A few respondents request more quantitative information in the final rule. Respondents suggest, further, that the "document lacks scientific integrity" because "numerous assumptions were made without any scientific foundation." Moreover, one group accuses the Forest Service of using "selective science" in its proposed rule. Several respondents question the adequacy of alternatives in the proposed rule. "The DEIS fails NEPA by not providing a full range of alternatives or accurately portraying alternative consequences" according to several respondents. In addition to providing an inadequate range of alternatives, several timber groups accuse the Forest Service of using an

"improper baseline" for comparison of alternatives by using a "hypothetical no action alternative." Other respondents maintain that the "entire effort is pre-decisional and in total violation of NEPA."

Closely related to the concerns about NEPA violations are concerns about violations of the Council on Environmental Quality regulations. Several respondents "question the Forest Service's adherence" to the CEQ regulations which require "accurate scientific analysis" and scientific integrity. Respondents also suggest that "more quantitative information would have provided a much less verbose narrative," and that the "excessively verbose sections" violate NEPA.

A few individuals assert that allowing motorized recreation on public land is a violation of the NEPA objective to "assure for all Americans safe, healthful, productive, and aesthetically and culturally pleasing surroundings." One Environmental group would like the final rule to specify "that all decisions regarding roadless areas made at the project and forest planning level" be subject to a full (NEPA) review and comment. One individual recommends the Forest Service eliminate references to spiritual renewal from NEPA documents. Another respondent, a state elected official, urges the Forest Service to support legislation amending NEPA that would exempt small timber sales from environmental assessments and impact statements in an attempt to resolve the categorical exclusion issue. Finally, one county elected official declares the NEPA process is unconstitutional because it "does not provide for due process" and there are "no provisions for just compensation."

Public Concern: The proposed rule should comply with the National Environmental Policy Act.

We are opposed to any action that does not meet the full requirements of NEPA. The proposal does not meet the purposes of the National Environmental Policy Act (NEPA) as defined in the Act.
1) To declare a national policy which will encourage productive and enjoyable harmony between man and his environment.
2) To promote efforts which will prevent or eliminate damage to the environment and biosphere and stimulate the heath and welfare of man. (County Elected Official, Reserve, NM - #43995.54100)

The DEIS does not even attempt to explain this or estimate the increased areas that will be impacted. Such omission is likely a violation of the National Environmental Policy Act (NEPA), and its administration via 40CFR 1500-08, which requires SPECIFIC beneficial or detrimental impacts.
The DEIS addressed this serious flaw by simply saying that local managers will define these areas at the next round of the local Forest Plan. Again, how can the public be asked to comment [when] impacts on the land have not been defined? (Professional Society, Park Falls, WI - #18662.54100)

THE DRAFT EIS CONTAINS NUMEROUS NEPA DEFICIENCIES.
Following is a list of areas in which the Draft EIS does not meet basic Council on Environmental Quality Regulations for NEPA: a) The NEPA process must be useful to decision-makers.
b) Emphasize interagency cooperation including counties.
c) Identify environmental effects and values in adequate detail so they can be compared to economic and technical analysis.
d) Study, develop and describe appropriate alternatives.
e) Consult early with State and local agencies.
f) Invite the participation of Federal, State ad local agencies.

g) Statements shall be concise, clear and to the point, and shall be supported by evidence.
h) Statements shall be analytic rather than encyclopedic.
i) Agencies shall not commit resources prejudicing selection of alternatives.
j) Statements shall assess the environmental impacts, rather than justify decisions already made.
k) Each statement shall contain a summary that adequately and accurately summarizes the statement.
l) Rigorously identify, explore, and objectively evaluate all reasonable alternatives.
m) Avoid useless bulk.
n) Circulate the statement and request comments from Federal, State and local agencies authorized to develop and enforce environmental standards.
o) Incorporate material by reference only when it is reasonably available.
p) Ensure the scientific integrity of discussions. (County Agency, Burns, OR - #13552.54100)

The DEIS violates the National Environmental Policy Act (NEPA) and the implementing CEQ regulations (40 C.F.R. [sub-section] 1501 et seq.) in innumerable ways, including but not limited to the following: The DEIS is too broad and general to provide adequate environmental review as called for by NEPA and the CEQ regulations. The DEIS is based upon outdated information. The information relied upon in the DEIS is unreliable and does not provide full and fair discussion of significant environmental impacts. The Information relied upon in the DEIS is internally inconsistent. The information provided in the DEIS, particularly the maps, is too general to provide adequate notice to the public regarding the nature of the proposal and its impacts. The DEIS violates the statutory mandates which must guide all actions of the USFS. The DEIS does not include appropriate, reasonable alternatives or present a meaningful range of alternatives for uses of available resources. The DEIS does not address the full range of impacts of the various alternatives, in particular the proposed action. The DEIS fails to adequately address cumulative impacts, including but not limited to past, present, and reasonably foreseeable future actions. The DEIS incorporates a number of unstated and unjustified assumptions which taint the entire analysis and render it invalid. The DEIS fails to utilize a systematic, interdisciplinary approach and does not provide for the integrated use of the natural and social sciences in connection with the proposed action. The DEIS fails to identify environmental effects and values in adequate detail so they can be compared to economic and technical analysis. The DEIS process has not allowed for circulation and review of related planning documents at the same time as the DEIS. The DEIS does not reflect the required professional integrity, including scientific integrity in its analysis. The DEIS fails to make explicit reference by footnote to the scientific and other sources relied upon for its conclusions. The DEIS is not supported by evidence that the agency has made the necessary, objective environmental analyses. (County Elected Official, St. George, UT - #15880.54100)

BY PROVIDING AN EARLY AND OPEN SCOPING PROCESS

The lack of a full range of alternatives can be attributed in large part to the flawed public scoping process implemented by the Forest Service under the NOI. The scoping period was of inadequate length and the paucity of information provided to the public during that process was totally insufficient to make objective decisions regarding formulation of alternatives. NEPA regulations require “an early and open process for determining the scope of issues to be addressed and for identifying the significant issues related to a proposed action.” (40 C.F.R. 1501.7). (Individual, Anchorage, AK - #43199.54100)

THE SCOPING PROCESS FOR THE DEIS WAS FLAWED AND SHOULD BE REINITIATED. The scoping for preparation of the DEIS was inadequate under the National Environmental Policy Act (NEPA) and the National Forest Management Act (NFMA). Under binding NEPA regulations, there “shall be an early and open process for determining the scope of issues to be addressed and for identifying the significant issues related to a proposed action” that will be addressed in the EIS. 40 C.F.R. 1501.7. The Forest Service failed to provide the public with adequate information on the roadless area initiative to allow informed public comment on the scope of issues to be addressed or on the significance of issues related to the proposed action. For example, during the scoping stage, the Forest Service could not provide information on the location and area of the national forest lands affected by this proposal. Indeed, as discussed above, the Forest Service is still unable to identify all the lands that will ultimately be impacted by this proposal. (Timber Company or Association, Eugene, OR - #15879.54100)

BY ADEQUATELY RESPONDING TO SCOPING COMMENTS

The DEIS fails NEPA requirements by not addressing specific legal concerns CAC and others put forth in written comments during the scoping period. There is no evidence in the DEIS that consideration was given to ANILCA Sections 101, 708, and 1326, which clearly prohibit the Forest Service from considering this roads prohibition in Alaska. (Wise Use or Land Rights Organization, Anchorage, AK - #43414.54100)

BY COLLABORATING WITH LOCAL STAKEHOLDERS

Information in the DEIS regarding the potential impacts to counties and local governments has not -- was not gathered from those same entities. The Forest Service totally bypassed the NEPA process when it excluded local stakeholders from participating meaningfully in the planning process. (County Elected Official, No Address - #22058.54100)

BY COOPERATING WITH LOCAL AGENCIES

Part 1501.6 Cooperating agencies. The purpose of this section is to emphasize agency cooperation early in the NEPA process. . . . (Note: Part 1508.5, definitions, states that "A State or local agency of similar qualifications or, when the effects are on a reservation, an Indian Tribe, may by agreement with the lead agency become a cooperating agency.")
FOREST SERVICE DRAFT EIS--The process did not include an invitation for local governments or counties to be cooperating agencies. The Draft EIS distribution list did not include local governments, counties, or conservation districts in the mailing. Local governments, counties, and conservation districts have special expertise in determining the effects and impacts of the proposed action on economies, fire, dependency, resiliency, noxious weeds, recreation and tourism, water, etc. (County Elected Official, Sheridan, WY - #51045.54100)

Part 1501.7 Scoping: As soon as practicable after its decision to prepare an environmental impact statement and before scoping process the lead agency shall publish a notice of intent.... (a) As part of the scoping process the lead agency shall:
(1) Invite the participation of affected Federal, State and local agencies...
FOREST SERVICE DRAFT EIS--The process did not include an invitation for local governments, counties, or conservation districts to particpate in the process. The invitation is actually for involvement after this rule is finalized. In fact, the section on Local Involvement (Page 3-209) states that "National prohibitions will not have an effect on the local involvement process itself. They would narrow the scope of what is to be decided upon locally with regard to the management of inventoried roadless areas." The problem is that the scope of any remaining decision is strictly limited to further protection of roadless areas. (County Elected Official, Sheridan, WY - #51045.54100)

BY CONSULTING WITH FEDERAL AGENCIES

The proposal may violate NEPA because the DEIS was issued before consultation with the US Fish and Wildlife Service and National Marine Fisheries Service was completed. NEPA requires full disclosure of potential impacts. Without full consultation and acceptance from the regulatory agencies, there is no assurance that the DEIS or Proposed Rule will be acceptable to these agencies or if additional requirements will need to be added. In order for the public to understand the impacts of the different alternatives and their potential impact to the future management of our National Forests, the results of this consultation must then be incorporated into the DEIS.
(University/Professional Society, Anchorage, AK - #43416.54100)

PART 1503--COMMENTING 1503.1 Inviting comments.
(1) Obtain comments of any Federal agency which has jurisdiction by law or special expertise with respect to any environmental impact involved or which is authorized to develop and enforce environmental standards.
FOREST SERVICE DRAFT EIS--The Forest Service did not actively solicit comments from local governments, counties, or conservation districts who have some legal jurisdiction and special expertise. Therefore, it can be concluded that the Forest Service failed to meet the requirements of this part. (County Elected Official, Sheridan, WY - #51045.54100)

BY CIRCULATING THE DRAFT EIS ACCORDING TO COUNCIL ON ENVIRONMENTAL QUALITY (CEQ) REGULATIONS, PART 1502.19

Part 1502.19 Circulation of the environmental impact statement . . . the entire statement shall be furnished to:
(a) Any Federal agency which has jurisdiction by law or special expertise with respect to any environmental impact involved and any appropriate Federal, State, or local agency authorized to enforce environmental standards.
FOREST SERVICE DRAFT EIS--The document was not distributed to local governments, counties, or conservation districts. Instead, copies were placed in County and Municipal Libraries. Unless one had a copy of the Draft EIS, he/she would not be aware of this distribution. Therefore, the agency failed to meet this part of the CEQ Regulations governing NEPA. Local governments, counties, and conservation districts all have special expertise the Forest Service should have used in developing alternatives and conducting the analysis. (County Elected Official, Sheridan, WY - #51045.54100)

BY NOT RUSHING THIS PROCESS

During the USFS plan presentation for the Wasatch-Cache forest, held in Mountain View, Wyoming, on November 18, 1999, the Service stated that roads would not be an issue with their management plans. The reasoning behind this was that "roadless" areas had already been "inventoried" and there would be no site-specific discussion. Is this proper procedure for the USFS to maintain the stance of being "consistent" with all forests? Does the "fast track" method obscure the intent of the National Environmental Policy Act ((NEPA) Sec. 1503.4 (a) 5). (Wise Use/Land Rights Organization, Rock Springs, WY - #2866.54100)

While the process, however subverted it may be, has appeared to follow NEPA law (I am certain that even that will be questioned in Federal court), it certainly has not followed the INTENT. How in God's name can you even entertain the concept of completing a NATIONAL level NEPA EIS document in under a year, when in fact the FLMP on my last Forest took over 12 years to compete and receive a ROD? (Recreational Organization, Kneeland, CA - #7085.70000)

In conclusion, the scoping process and comment period for the Forest Service Roadless Area Conservation DEIS have been rushed to the point the NEPA process has [been] seriously compromised. As a minimum, the comment period for the DEIS should be extended another 120 days. A more reasoned approach would be to re-enter the scoping phase for proposed roadless area rules and to address the multitude of issues that remain unanswered, a few of which have been addressed in this writer's observations and comments. (State Elected Official, Albion, ID - #44351.54100)

BY NOT PRESENTING FALSE FACTS

We have already pointed out how Forest Plans already protect a majority of the roadless areas and only plan for roads on a small portion of the inventoried areas. Furthermore, the Agency has information on the specific proposals for road proposals for the next decade. The agency deceives the public by not disclosing the actual portions of roadless areas proposed for roads rather than portraying these plans as "...likely to significantly alter landscapes and cause landscape fragmentation on a national scale..." to give the impression that all these roadless areas are at risk of being roaded if no national action is taken. Such a blatantly false portrayal is highly unethical for a public agency and violates APA and NEPA. (Individual, Whitefish, MT - #30417.50000)

Consequences described for the no action alternative are also patently false. The statement that Alternative A (no action) results in the "greatest potential for loss of roadless characteristics and values, since they receive no special consideration" is wrong and inconsistent with current law. NEPA requires this type of analysis whenever roadless characteristic impacts are raised as an issue. The current planning regulations also have this requirement as 36 CFR 219.17 requires evaluation of roadless areas and roadless characteristics. (Individual, Anchorage, AK - #43199.54100)

BY PROVIDING AN ACCURATE SUMMARY

Part 1502.12 Summary Each environmental impact statement shall contain a summary which adequately and accurately summarizes the statement.
FOREST SERVICE DRAFT EIS--The document provides a summary that does not accurately summarize the Draft EIS. In fact, the description of alternatives and comparison of alternatives in the summary omits critical information that could lead to a misinterpretation of what the agency is proposing. For example, the summary describes the procedural proposed action as an option for local decision-makers on whether and how to protect roadless characteristics. The Draft EIS adds a sentence stating that local decision-makers could not authorize road construction or reconstruction. The summary gives broad discretion and the Draft EIS takes it away. This is not an accurate reflection of what the Draft EIS proposed action represents. Finally, the comparison of alternatives table in the summary omits many of the factors evaluated in the Draft EIS which appear to support the proposed action. (County Elected Officials, Sheridan, WY - #51045.54100)

BY PROVIDING SUFFICIENT INFORMATION FOR THE PUBLIC TO EVALUATE

It is a matter of NEPA law that environmental impact statements must contain sufficient information to allow the readers to fully evaluate the effects of the proposal. Although the DEIS states that the proposed regulation, if adopted, would cover more than 4.0 million acres in Utah, that acreage figure is calculated by adding the acreage of many, many smaller units. The DEIS does not state how many smaller units are proposed in the State of Utah. The state believes quite strongly that each of the proposed units must be examined on its own merits. NEPA requires that detailed on-the-ground information be given for each and every proposal. The fact that this is a nationwide proposal does not excuse this requirement. It is true that some nationwide proposals are made in programmatic style, but each of them is followed by localized NEPA studies. The current proposal is not styled as a programmatic EIS, but states instead that it will have immediate effect on-the-ground. Therefore, the state and citizens are entitled to enough detailed information to evaluate each and every area. (State Elected Official, Salt Lake City, UT - #43918.50000)

The Code of Federal Regulations (40 CFR 1502.8) directs that an EIS… "Be written in plain language and may use appropriate graphics so that decision makers can readily understand them." The vague maps that apply to our area, which were just recently obtained, do not meet this standard. The maps and definitions should be expanded and clarified in a revised proposed rule. (Town or Municipality/Municipal Association, No Address - #51128.54100)

Third, the state is aware of a decision by the supervisor of the Dixie National Forest two years ago to decommission 89 miles of roads in a portion of the Forest known as Boulder Top. Forty-two miles of road were left open, and designated part of the Forest Development Road System. This decision was upheld in federal district court in Utah, and we would expect the maps provided in the current proposal to reflect this. A casual look at the maps provided shows no roads at all, and the public might believe the entire area is roadless. When we enlarge the GIS maps provided--greatly enlarge them- we can start to discern road patterns. We cannot determine if these traces on a stylized map are in fact the roads left open by the court decision. Further, assuming the information is correct, the roads do define areas between them which are labeled as the proposed restrictive areas for this regulation. But the shapes of these areas do not match any of the shapes indicated on the mid 80s draft inventory that we do have. We can therefore only conclude first, the judicially approved roads are apparently not accurately represented, and second, some other source of information has been used to create the current restrictive unit shapes. We are not aware of a late '90s published draft inventory for the Dixie Forests, similar to that done in 1999 by the Uintah Forest. We are aware that initial roadless area inventory work was underway in both the Dixie and the Fishlake National Forests, as evidenced by a joint letter dated June 26, 1998 from the two Forest Supervisors. Therefore, we believe that the Forest Service is relying on unpublished work to establish a major policy initiative, and has not provided that work to the state or anyone else for review. This is an illegal violation of NEPA requirements. (State Elected Official, Salt Lake City, UT - #43918.50000)

BY ADDRESSING INADEQUACIES THAT PRECLUDE MEANINGFUL ANALYSIS

Revise the Draft EIS, as per CEQ Regulation 40 CFR 1502.9 (a), to address inadequacies that preclude meaningful analysis. (County Elected Official, Ely, NV - #44348.50000)

If the Proposed Rule and Draft EIS moves forward, the District would like to request that the Forest Service at a minimum, revise the Draft EIS to account for the inadequacies found and distribute it for public comment. CEQ Regulation 1502.9 states that "...if a draft statement is so inadequate as to preclude meaningful analysis, the agency shall prepare and circulate a revised draft..." (Town or Municipality/Municipal Association, No Address - #47907.50000)

We believe that the data on existing Forest Plan protection and management of roadless areas is so inadequately and poorly presented and so full of errors, that the DEIS fails a test of reasonable public disclosure required by APA and NEPA. It is clear that a supplemental DEIS must be issued correcting these deficiencies and providing accurate information to the public before a final EIS can be legally issued. (Individual, Whitefish, MT - #30417.54100)

BY ADDRESSING SIGNIFICANT NEW INFORMATION

Supplement this Draft EIS, as per CEQ Regulation 40 CFR 1502.9 (c)(ii), to address the significant new circumstances and information that is relevant to our environmental concern and bearing on the proposed action and its impacts. (County Elected Official, Ely, NV - #44348.50000)

Part 1502.9 Draft, final, and supplemental statement (a) . . . if a draft statement is so inadequate as to preclude meaningful analysis, the agency shall prepare and circulate a revised draft of the appropriate portion.
(c) Agencies:
(1) Shall prepare supplements to either draft or final environmental statements if:
(ii) There are significant new circumstances or information relevant to environmental concerns and bearing on the proposed action or its impacts.
FOREST SERVICE DRAFT EIS--The references in this part of the regulations requires Federal agencies to either revise or supplement statements that are inadequate. The Roadless Area Conservation document lacks adequacy, and comments submitted provide significant new circumstances. Therefore, the conclusion of the Forest Service should be to, as a minimum, revise and recirculate the draft. (County Elected Officials, Sheridan, WY - #51045.54100)

BY ADEQUATELY DESCRIBING THE AFFECTED ENVIRONMENT

AN EIS MUST "DESCRIBE THE ENVIRONMENT OF THE AREA(S) TO BE AFFECTED." 40 C.F.R. 1502.15. The DEIS violates this binding NEPA regulation by basing the acreages and locations of the roadless areas primarily on 21-year old maps done at a scale of 1:500,000 and by not describing the different forest health conditions, timber resources, need for primitive vs. roaded recreation, existence of listed species dependent on a particular habitat, etc. in each individual roadless area. (Timber Company or Association, Eugene, OR - #15879.7000)

FOREST SERVICE DRAFT EIS--The document fails to describe the environmental effects in adequate detail. The proposed rule documents the fact that most of the analysis was "qualitative" in nature. The subjective disclosure of effects (highly likely, slightly, small increments, most benefits, lowers the likelihood, increased incidence, slightly increasing, sharp reductions, minimizing, measurable, lower risk, etc.) cannot be effectively used to compare the economic and technical effects of the proposed action. (County Elected Official, Sheridan, WY - #51045.54100)

BY PROVIDING A FULL AND FAIR DISCUSSION OF SIGNIFICANT ENVIRONMENTAL IMPACTS

PART 1502--ENVIRONMENTAL IMPACT STATEMENT
Part 1502.1 Purpose. It (the EIS) shall provide full and fair discussion of significant environmental impacts and inform decision-makers and the public of the reasonable alternatives...Statements shall be concise, clear, and to the point, and shall be supported by evidence that the agency has made the necessary environmental analyses.
FOREST SERVICE DRAFT EIS--The document does not provide a full and fair discussion of significant environmental effects. Instead, many sections are extremely biased against road construction, reconstruction, and

timber harvest. The document does not inform the decision-makers and the public with reasonable alternatives (more on this later). The document is far from concise, clear, and to the point--many times repeating or continuing the affected environment discussions in sections that should disclose effects. Few of the assumptions are supported by evidence that the agency has conducted a complete environmental analysis. (County Elected Official, Sheridan, WY - #51045.54100)

Likewise, NEPA requires a balanced presentation of the effects from an action. While your DEIS is quick to point out that we're only dealing with about 2% of the lands in the United States (DEIS page S-1) it fails to tell that the proposal will affect about 25% of the all NF System lands. This is not multiple-use management. The DEIS also fails to disclose the positive benefits of road construction and development. The effects are so generalized they become meaningless. (Individual, Great Falls, MT - #28425.54100)

Finally, and most seriously from a NEPA standpoint, Chapter 2 (Table 202) fails to accurately and sufficiently disclose the effects of the Prohibition Alternatives. . . . In Table 2-2, under Proposed Action and Preferred Alternative (Alternative 2), for Watershed Resources, Air Resources, Biological Diversity, Threatened and Endangered and Proposed Species, and Hunting and Fishing Opportunity, there is no assessment of the cumulative and absolute, long-term effects of 22 million IRA acres at unmitigated risk of catastrophic fire. There is an assessment of the short-term effects of roads, but an assessment of the long-term effects of fire risk is lacking. A RELATIVE RISK ASSESSMENT IS NEEDED; THAT IS, AN ASSESSMENT OF THE SHORT-TERM RISKS OF INACTIONS (UNMITIGATED FOR RISKS). (Environmental/Preservation Organization, Missoula, MT - #43339.54100)

The DEIS discusses one of the many negative, ecological effects of mining, and none of the many negative, ecological and social effects of OHVs. These are serious deficiencies, and a violation of NEPA, which requires disclosure of all significant effects. (Individual, Olympia, WA - #25898.54100)

Directly related to the OHV issue are the impacts of unclassified roads in roadless and unroaded areas. The proposed new rule for the national forest road system admits that you are aware of at least 60,000 miles of unclassified roads and expect that "future inventories will verify the existence of substantially more miles of unclassified roads" (2000 Federal Register, p. 11678). These roads were created primarily by OHV use, much of it's unauthorized. They have all of the effects of permanent roads, but often worse, because they are not engineered to the same standards, nor do they receive maintenance. Yet the impacts of these roads are not disclosed in the DEIS, a violation of NEPA. (Individual, Olympia, WA - #25898.54100)

BY CONDUCTING AN AREA-BY-AREA EFFECTS ANALYSIS

The national Environmental Policy Act ("NEPA") also requires a roadless area-by-area analysis for the three reasons presented below. Yet, the DEIS does not provide any roadless area-by-area description of the existing environment--of the timber and other resource values in each roadless area. Nor does the DEIS provide any roadless area-by-area analysis of the impacts of the proposed road ban on forest health, on fire risks, on access to timber and minerals, etc. Instead of providing roadless area-specific resource information and impact assessment: (1) DEIS volume 1 merely provides a generalized guess on the impacts at the national level; and (2) DEIS volume 2 simply provides a map indicating the physical location of the roadless areas. This does not satisfy NEPA. NEPA requires a roadless area-by-area description of the resources potentially affected and a roadless area-by-area impact analysis, for the following reasons:
A. THE FOREST SERVICE'S LAST ATTEMPT TO DETERMINE THE FUTURE FATE OF ROADLESS AREAS AT THE NATIONAL LEVEL (RARE II) WAS INVALIDATED LARGELY BECAUSE THAT EIS FAILED TO PROVIDE THE "DETAILED SITE-SPECIFIC ANALAYSIS" OF THE PROPOSED ACTION'S IMPACTS ON EACH ROADLESS AREA. STATE OF CALIFORNIA V. BLOCK, 690 F.2d 753, 765 (9th Cir. 1982). The DEIS on the roadless area rulemaking does not contain the roadless area-by-area analysis required by CALIFORNIA V. BLOCK. The Forest Service should either abandon the national rulemaking on roadless areas or prepare a DEIS providing adequate information on each affected roadless area, or the agency will repeat the sorry history of RARE II's demise in CALIFORNIA V. BLOCK. (Timber Company or Association, Eugene, OR - #15879.7000)

Since the roadless area rulemaking makes the "'critical decision' to commit these areas" to roadless uses, NEPA requires the Forest Service to assess the biological and socio-economic impacts of that decision on each roadless area. 690 F.2d at 763. The "Forest Service [must] compare for each area the potential benefits of non-wilderness management against the potential adverse environmental consequences." 690 F.2d at 764. The CALIFORNIA V. BLOCK Court found that aggregating roadless area impacts for a macro analysis is not sufficient. "Having decided to allocate simultaneously millions of acres of land to non-wilderness use [here, roadless uses]. The Forest Service may not rely upon forecasting difficulties or the task's magnitude to excuse the absence of a reasonably thorough site-specific analysis of the decision's environmental consequences." 690 F.2d at 765. The Forest Service simply has not provided the level of site-specific resource and impact information for each roadless area that the NFMA, MUSYA, and NEPA require before changing the forest plan's direction for individual roadless areas. By not providing a roadless area-by-area analysis, the Forest Service is depriving the public of the information needed to comment that area X should retain its roadless status, but due to factors such as high timber value or forest health risks, roads should be allowed in roadless area Y. By not providing a roadless area-by-area analysis of the environmental and socio-economic impacts of permanent roadless designation, the Forest Service is depriving itself of the site-specific information needed to comply with NFMA and NEPA, and the information needed for sound decision-making. (Timber Company or Association, Eugene, OR - #15879.7000)

Due to the absence of site-specific information, the Forest Service and public are deprived of information that, for example, might support a decision that the fire risks or forest health risks in a certain set of roadless areas are too high to justify a rulemaking prohibiting road access to such areas. As the CALIFORNIA V. BLOCK Court found, the "Forest Service [must] compare for each area the potential benefits of nonwilderness management against the potential adverse environmental consequences." 690 F.2d at 764. The DEIS fails to provide the type of individualized analysis of impacts to roadless area resources that are provided in the forest plan EIS, and which led to responsible decisions that roads should be allowed in 33.8 million acres of inventoried roadless areas. If the Forest Service wants to alter the forest plan's balancing of multiple uses, it must provide an equivalent level of site-specific NEPA analysis in this EIS. (Timber Company or Association, Eugene, OR - #15879.7000)

Locally severe effects of prohibitions arbitrarily precluding long planned recreational developments such as ski areas are not disclosed in violation of NEPA. (Individual, Whitefish, MT - #30417.54100)

The same is true of potential environmental damage caused by roads. That is a discussion for the NEPA analysis at the project level. The potential harm of a road compared to the benefits that may exist from the existence of the road should be decided site specifically. (Business/Business Association, Altraus, CA - #29955.54100)

BY PROVIDING A COST/BENEFIT ANAYLSIS

CEQ Reg Paragraph 1502.23 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. (County Elected Official, Reserve, NM - #43995.54100)

Fire Effects on Watersheds, P. 3-41 to 3-43. This section minimally describes the adverse effects of fire on watersheds and the role of roadless areas in contributing to increased risk. Although the Forest Service admits that many domestic water supply watersheds have already been severely burned, inadequate disclosure of the true cost per acre (fire fighting, human injuries or loss of life, loss of property, cost of rehabilitation and water treatment) is in violation of APA and NEPA. (Individual, Whitefish, MT - #30417.54100)

BY DESCRIBING DIRECT AND INDIRECT EFFECTS AND CONFLICTS WITH OTHER PLANS

AN EIS MUST ADDRESS THE "ENVIRONMENTAL IMPACTS OF THE ALTERNATIVES," INCLUDING "[D]IRECT EFFECTS AND THEIR SIGNIFICANCE," "[I]NDIRECT EFFECTS AND THEIR SIGNIFICANCE," AND "[P]OSSIBLE CONFLICTS BETWEEN THE PROPOSED ACTION AND THE OBJECTIVES OF FEDERAL, REGIONAL, STATE, AND LOCAL...LAND USE PLANS." 40 C.F.R. 1502.16; SEE ID at [sections] 1502.14, 1508.8. The DEIS does not describe the different "ecological..., economic," and "health" impacts of

precluding roads on each inventoried roadless area. 40 C.F.R. 1508.8. (Timber Company or Association, Eugene, OR - #15879.7000

Part 1502.16 Environmental consequences. This section forms the scientific and analytic basis for the comparisons...It shall include discussions of:
(a) Direct effects and their significance
(b) Indirect effects and their significance
(c) Possible conflicts between the proposed action and the objectives of Federal, regional, State, and local land use plans, policies, and controls for the area.
FOREST SERVICE DRAFT EIS--Most of the sections in the document lack a quantitative analysis necessary to determine direct and indirect effects and conflicts with State and local land use plans and policies. In fact, there are no references to State and local land use plans or policies. Since the agency failed to consult with local governments, it could not possibly be aware of and analyze these conflicts. (County Elected Official, Sheridan, WY - #51045.54100)

This section [Civil Rights and Environmental Justice] adds little to the concerns expressed by many on the effects of the "Proposed Action" to persons with disabilities. Although this issue is mentioned in the Affected Environment, no disclosure is provided on the effects [of the alternatives]. Laws such as the Rehabilitation Act, as amended, and the American's with Disabilities Act must be addressed and evaluated. Also, reference is made to Native American, Hispanic, and Asian American cultural sites. These sites are not identified nor is information provided to adequately assess impacts. For example, "How many of these sites exist? Where are they located? What is the level of use?" RELIEF: The Forest Service must address the effects on persons with disabilities in the Affected Environment section (Page 3-206, first paragraph) and disclose the effects of the alternatives as required by CEQ Regulation 1502.16. In addition, the questions presented about cultural sites must be answered. (County Elected Official, Basin, WY - #43980.51000)

BY INCLUDING A CUMULATIVE EFFECTS ANALYSIS

There is no cumulative analysis. The Forest Service does not even attempt to address past, present and reasonably foreseeable events. Instead the cumulative analysis section relies upon a discussion of two other pending rules. Clearly, the Forest Service has not met its obligations under 40CFR1508.7. (County Elected Official, Fallon, NV - #17290.53600)

TLMP and the Roadless EIS both fail to consider the cumulative effects of Native Corporation logging on the Tongass. The National Environmental Policy Act (NEPA) requires that these types of effects be studied. While the total land area in Southeast Alaska outside of federal ownership is small in comparison, the acreage of logging that has occurred on those lands is approaching a volume near what the Forest Service has sold. The Final EIS should study the true numbers and the effects, including the identification of abutting past and future timber sales between the two ownerships, as I believe they are significant. In addition, the negative logging impacts on Native Corporation lands are currently, both in law and in practice, more significant than on public lands and this also should be considered. (Individual, Bloomington, IN - #26023.54100)

BY CONSIDERING CUMULATIVE IMPACTS OF MULTIPLE PROPOSALS

In NEPA parlance, this artificial division of a whole project into smaller segments for less comprehensive analysis is called the unlawful "segmentation" of a project. SEE MANDELKER, NEPA LAW AND LITIGATION [section] 9.04 (West 2d ed. 1999). The results of segmentation here are: (1) an arbitrary division of the whole in violation of the APA; (2) confusion in the mind of the public on the three proposals, which frustrates the ability to provide meaningful public comment; (3) no discussion of the cumulative environmental impacts required by NEPA; and (4) no discussion of the cumulative economic impacts required under the Regulatory Flexibility Act and other law. (Timber Company or Association, Eugene, OR - #15879.54100)

The Supreme Court has held that section 102 (2)(c) of NEPA, may require a comprehensive impact statement in certain situations where several proposed actions are pending at the same time. Kleppe v Sierra Club, 427 U.S. 390 (1976). Congress intended this to be an "action forcing" provision serving as a directive to agencies "to assure consideration of the environmental impact of actions in decision-making" Id at 409. "When several proposals for

related actions that will have cumulative or synergistic environmental impact upon a region are pending concurrently before an agency, their environmental consequences must be considered together. Only through comprehensive consideration of pending proposals can the agency evaluate different courses of action" Id at 410. As Chief Dombeck has noted, the proposals in question are interrelated, there "will be some overlap as we pursue these two separate but closely related actions" (Testimony of Michael P. Dombeck before the Subcommittee on Forests and Public Lands Management, Committee on Energy and Natural Resources, United States Senate, November 2, 1999). All three proposals will affect to some extent "unroaded" areas, and geographically the areas are overlapping or identical in part…it is clear that if the Service continues with these proposals, the lands affected under ICBEMP, the Roadless and Road Management proposals will be focused upon and will impact identical regions in Montana. Therefore, the proposals are so closely tied together that one document is required under NEPA to avoid isolated consideration of the cumulative effect of the 'similar actions' in time and geography of the roadless and road management proposals. The two prongs of cumulative actions and similar actions are met by the Roadless and Road Management proposals, and to a lesser degree the ICBEMP proposal with foreseeable impacts in geography and time.

The Road Management proposal's action is cumulative in conjunction with the Roadless proposal, as additional "unroaded" lands will be added to the Roadless proposal before the Roadless FEIS is completed. As acknowledged earlier, under the current Roads Strategy EA this will increase the total School Trust acres impacted from 20,961 to 41,403 in Northwestern Montana; clearly, a significant cumulative impact that should be discussed in the same impact statement. Additionally, the road management proposal is an action similar to the Roadless proposal as both are currently on similar timetables, with both expected to be done by next fall and covering the same general geography. (State Elected Official, Helena, MT - #19289.54100)

Under NEPA at 40 CFR 1502.4(b), EIS preparation should include a "statement on broad actions so that they are relevant to policy and are timed to coincide with meaningful points in agency planning and decision-making...including actions in the same general region geographically and with relevant similarities of timing, impacts and methods of implementation generically." As already discussed, the Forest Service as an agency is planning a policy of "unroaded" lands in three proposals that are on similar times lines, impact similar roads and "Unroaded" lands (creating more "unroaded" lands in all three proposals through decommissioning) and in the same general region. The Forest Service's approach of "merely announcing" impacts to the roadless proposal from the other proposals does nothing to address the inter-regional cumulative impacts as is required by law. See Natural Resources Defense Council Inc. v. Hodel , 865 F.2d 288,299 (D.D.Cir. 1988). The Road Management Strategy's EA on page 5 states, "the effects of the road management strategy on roadless or other unroaded areas would be short term; long term effects of additional projections in roadless and often unroaded areas will be addressed with EIS for the proposed Roadless Area Protection Rule." (State Elected Official, MT - #19289.54100)

Even if a comprehensive EIS is not required, the DEIS does not supply the "CUMULATIVE IMPACTS" ANALYSIS required by 40 C.F.R. [sections] 1502.16, 1508.7, 1508.8, 1508.25. The three sets of proposed regulations and guidance will have cumulative impacts. For example, with respect to uninventoried unroaded areas, the road management instructions would make it very difficult to build a road to provide forest health benefits (e.g., to limit a disease outbreak or to reduce fire risk) prior to revision of a forest plan. The requirement for an EIS in such circumstances (even when the forest plan had authorized road construction in the area and its impacts had been generally addressed in the plan EIS, to which a project-level EA could tier) and the other standards in the road management instructions seem calculated to preclude or minimize road construction in uninventoried unroaded areas. Then, the combination of the road management instructions/roadless area rules/forest planning rules would make it very difficult to build such a road after the time a forest plan has been revised. Thus, these three rulemakings largely predetermine that there will generally be no new roads in uninventoried unroaded areas. This has cumulative adverse environmental effects on forest health and other environmental values which must be addressed in an EIS, but which are not addressed in the DEIS.

As another example, the roadless area rule and the road transportation rule combine to make it more difficult to construct the roads needed to access timber anywhere in the National Forest System. This will have greater adverse cumulative effects on forest health (timber harvesting to reduce the risks of catastrophic fires and to contain disease outbreaks) and greater adverse socioeconomic effects (from a reduced timber supply).

Thus, the Forest Service has not provided either the comprehensive EIS or the cumulative impact discussion required by NEPA. To comply with NEPA, the agency should either: (1) abandon the proposals due to the NEPA and other deficiencies; or (2) issue a draft EIS for public review that contains the cumulative impact analyses required by NEPA. (Timber Company or Association, Eugene, OR - #15879.54100)

BY CREATING AN ANALYTIC DOCUMENT

Part 1502.2 Implementation (a) Environmental impact statements shall be analytic rather than encyclopedic. FOREST SERVICE DRAFT EIS--The document contains little quantitative information and uses an encyclopedic discussion that appears to repeatedly support the proposed action. (County Elected Official, Sheridan, WY - #51045.54100)

BY PROVIDING A DOCUMENT OF SCIENTIFIC INTEGRITY

Part 1502.24 Methodology and scientific accuracy. Agencies shall insure the professional integrity, including scientific integrity, of the discussions and analyses in environmental impact statements.
FOREST SERVICE DRAFT EIS--The document lacks scientific integrity on the basis that numerous assumptions were made without any scientific foundation. Many assumptions appear to be based on the authors' values and biases. (County Elected Official, Sheridan, WY - #51045.54100)

BY NOT USING "SELECTIVE SCIENCE"

If the EIS justifies analyzing only logging and prescribed burning in various amounts without considering the Cutting, Chipping, and Scattering method, this action could be considered "selective science." If the EIS justifies logging, because the project team believes the use of mechanical methods to reduce fuel loading and/or modify hazard and risk are well documented in the literature, and cites particular literature, like Harrison (1975), Schimke (1965), Dell and Ward (1969), Tesch (1986), and Lysne (1983), to justify this position, this action could be considered using "selective science." Referencing these citations and ignoring the growing body of science that proves that logging is the major cause of forest problems, could confirm the Forest Service's reliance on "selective science" to promote logging. By negating or ignoring the results from hundreds of other studies referenced in the Sierra Nevada Science Review, the Sierra Nevada Ecosystem Project reports, and other scientific papers that show logging and road building as the major causes of loss of habitat and decline of species, the EIS would be using "selective science," which has been determined by U.S. District Court to be a violation of the National Environmental Policy Act (NEPA) and the National Forest Management Act (NFMA). (NFMA, 16 U.S.C. § 1600 et seq., and NEPA, 42 U.S.C. § 4321 et seq,) In his order, signed on September 25, 1998 in the United States District Court of the District of Colorado, US District Court Judge Lewis Babcock ruled (Civil Action 94-B-277 Colorado Environmental Coalition v. Daniel Glickman et. al.) against the Trout Mountain Timber Sale in the Rio Grande National Forest for using "selective science" by ignoring studies showing that timber sales are likely to harm declining bird species. (Environmental/Preservation Organization, Weldon, CA - #16041.54100)

BY PROVIDING AN ADEQUATE RANGE OF ALTERNATIVES

The DEIS fails NEPA by not providing a full range of alternatives or accurately portraying alternative consequences. with the exception of Alternative A, all alternatives prohibit road building in all roadless areas greater than 5000 acres. This all or nothing set of alternatives does not fulfill the full range of alternatives criteria required by NEPA. (Wise Use or Land Rights Organization, Anchorage, AK - #43414.54100)

Page 2-4 through 2-9--There are inherent problems with the range of procedural alternatives presented. First, they do not represent a full range as required by CEQ Regulations (also addressed under NEPA Deficiencies). Many of the alternatives address procedures currently required by Forest Service direction and policy, e.g., Alternatives A, C and D. The only difference Alternative B provides is the statement that prohibits local decision makers from authorizing road construction and reconstruction. RELIEF: The Forest Service must present a full range of alternatives that are distinctly different from each other. The alternatives must be able to display a meaningful disclosure of effects. (County Elected Official, Basin, WY - #43980.54000)

In our judgment, the DEIS is not in compliance with NEPA and must be withdrawn until consultation is completed for ALL alternatives. The results of this consultation must then be incorporated into the DEIS for the public to understand the true difference between alternatives and their potential impact to the future management of our National Forests and the potential impacts to local communities. (Individual, Colville, WA - #13519.54100)

The range of alternatives for the Roadless DEIS is not proper under NEPA because there is little opportunity to select between the No Action (Alt. A) and the Proposed Action (Alt. B). Alternatives C and D appear to be such middle ground but, in reality are not because, under these alternatives, all of the areas designated as roadless or unroaded would be managed as roadless without any official designation. (University/Professional Society, Laramie, WY - #25484.54100)

It fails to meet the requirements to use the NEPA process to identify and assess the reasonable alternatives to proposed actions that will avoid or minimize adverse effects of these actions upon the quality of the human environment (40CFR1500.2(3)). To address this deficiency, USFS needs to make a concerted effort to gather this information in an interim draft document for distribution and review by the public, prior to issuance of a final EIS. (Utility Group, Gillette, WY - #28925.54100)

BY USING A PROPER BASELINE FOR COMPARISON OF ALTERNATIVES

D. THE DEIS USES AN IMPROPER BASELINE FOR COMPARING ALTERNATIVES AGAINST THE "NO ACTION" ALTERNATIVE AND THUS SERIOUSLY UNDERESTIMATES THE ECONOMIC IMPACTS.
1. LEGAL DEFICIENCES. The DEIS engages in misdirection which hides the true socioeconomic impacts of the substantial reduction in timber volume attributable to the rulemaking. The Council on Environmental Quality has stated that the impacts of the "no action" alternative (the baseline used for calculating the incremental impacts of the alternatives) in forest planning should be the projected impacts of continuing to implement the forest plan.
[Where a proposed action would] update a land management plan...."no action" is "no change" from current management direction or level of management intensity....Therefore, the "no action" alternative may be thought of in terms of continuing with the present course of action until that action is changed. Consequently, projected impacts of alternative management schemes would be compared in the EIS to those impacts projected for the current plan. 46 Fed. Reg. 18026, 18027 (March 1, 1981) (CEQ's Answers to 40 Most Asked Questions on NEPA Regulations).
Yet, the DEIS does not compare the impacts of the roadless rulemaking to the "impacts projected for the current plan" if the full level of timber sales projected in the forest plan (the timber sale schedule level, SEE 36 C.F.R. 219.16) are conducted. Instead of using the timber sale schedule level prescribed by timber plans, the lower "timber volume in FYs 1996 to 1999 was used in developing the baseline for the No Action Alternative." DEIS at 3-182. Since use of this baseline is contrary to CEQ's direction, the correct baseline should be employed (or at least portrayed as an alternate basis for comparison) in the final EIS. (Timber Company or Association, Eugene, OR - #15879.54000)

The DEIS takes other unwarranted liberties to make the incremental impacts of the preferred alternative on timber sale level harvesting seem small. First, "the planned [timber sale] offer [level in roadless areas] was reduced downward by 30% to account for volume reductions between planned offer and volume offered for sale." DEIS at 3-184. Second, this number was further reduced to address an alleged historical difference "between volume offered and volume sold"--even though one would expect acceptable bids on a higher percentage of timber if the Forest Service is providing a smaller supply. DEIS at 3-185. Through this mathematical sleight of hand, the DEIS manages to reduce an "annual planned offer...of 222 million board feet" in roadless areas down to an "adjust[ed]" level of "131 million board-feet." DEIS at 3-185. Thus, by reducing the baseline of the planned timber offer level in roadless areas by over 40%, the agency has understated the expected socioeconomic impacts of the proposed alternative by the same 40%. This artificial manipulation of the baseline is improper under CEQ's guidance and creates an EIS artificially biased towards the agency's preferred alternative. (Timber Company or Association, Eugene, OR - #15879.54000)

The DEIS ILLEGALLY USES A HYPOTHETICAL NO ACTION ALTERNATIVE TO COMPARE THE ALTERNATIVE TO--the basis for comparing alternatives to the no action alternative must be the legally approved forest plans for each national forest [and] not projects and plans projected for the next five years. (Timber Company or Organization, Eugene, OR - #43862.54100)

BY PROVIDING OBJECTIVE ANALYSIS OF ALL REASONABLE ALTERNATIVES

Part 1502.2 Implementation (f) Agencies shall not commit resources prejudicing selection of alternatives before making a final decision.
(g) Environmental impact statements shall serve as the means of assessing the environmental impact of proposed agency actions, rather than justifying decisions already made.
FOREST SERVICE DRAFT EIS--the Chief, USDA Forest Service placed an eighteen-month moratorium on road construction and reconstruction in roadless areas before the draft rule was released. This provides evidence that the Draft EIS is prejudiced and much of the written text appears to justify the proposed action. After decades of managing roadless areas, it appears suspicious that a moratorium on these activities was necessary. In fact, the document discloses in many sections that road construction and timber harvest in roadless areas has declined significantly in the past decade. What is the urgency when projected development would equate to less than one half of one percent of all roadless acres in the United States during the eighteen-month period? (County Elected Official, Sheridan, WY - #51045)

Part 1502.13 Alternatives including the proposed action. This section is the heart of the environmental impact statement...it should present the environmental impacts of the proposal and the alternatives in comparative form, thus sharply defining the issues and providing a clear basis for choice among options by the decision-maker and public. In this section, agencies shall:
(a) Rigorously explore and objectively evaluate all reasonable alternatives...
FOREST SERVICE DRAFT EIS--This requirement of NEPA assures that the analysis in the document leads to a clear basis for choice. However, the analysis must be objectively evaluated--which in this case it is not. The document is peppered with numerous subjective, biased, and prejudicial statements. (County Elected Official, Sheridan, WY - #51045.54100)

PART 1506--OTHER REQUIREMENTS OF NEPA 1506.1 Limitations on actions during NEPA process.
(a) Until an agency issues a record of decision, no action concerning the proposal shall be taken which would:
(2) Limit the choice of reasonable alternatives.
(c) While work on a required program environmental impact statement is in progress and the action is not covered by an existing program statement, agencies shall not undertake in the interim any major Federal action covered by the program which may significantly affect the quality of the human environment unless such action:
(3) Will not prejudice the ultimate decision on the program. Interim action prejudices the ultimate decision on the program when it tends to determine subsequent development or limit alternatives.
FOREST SERVICE DRAFT EIS--Refer to comments under Part 1502.2, Implementation. (County Elected Official, Sheridan, WY - #51045.54100)

This entire effort is pre-decisional and in total violation of NEPA. If the original direction wasn't evidence enough of this being a pre-decisional effort, Vice President Gore stated on Tuesday, May 30th, "And just so I'm crystal clear about it: No new road building and no timber sales in the roadless areas of our national forests" (The Spokesman-Review, Wednesday, May 31, 2000). IT IS VERY CLEAR THAT THE ADMINISTRATION HAS ALREADY DETERMINED WHAT THE OUTCOME OF THIS EFFORT WILL BE AND THAT DECISION IS "PRE-DECISIONAL" IN THE CONTEXT OF LAW. (Individual, Colville, WA - #13519.54100)

The DEIS fails NEPA by not providing a full disclosure of potential impacts to the public. Consultation with other agencies, states, and tribal governments was not complete prior to issuance of the DEIS. Benefits of the proposed rule are inflated based on subjective reasoning, costs of the proposed rule are extremely deflated and based on speculative reasoning. There is scant evidence in the DEIS that the Forest Service has truly done any analysis that objectively considers the long term impacts of this proposal. (Individual, Anchorage, AK - #43199.54100)

Public Concern: The Forest Service should comply with the Council on Environmental Quality regulations.

The next item that concerns us is the flagrant abuse of the law. This draft EIS fails to meet the basic Council on Environmental Quality Regulations concerning the National Environmental Policy Act. I could name sixteen to twenty violations and I would just be getting started. This will be addressed in our "White Paper. (County Agency, Lander, WY - #13193.54100)

BY PROVIDING ACCURATE SCIENTIFIC ANALYSIS

The regulations promulgated by the Council on Environmental Quality (CEQ) under NEPA call for "accurate scientific analysis" (40 C.F.R. [section] 1500.1(b)) and "scientific integrity" (40 C.F.R. [section]1502.24) in the analytical process. We question the Forest Service's adherence to these regulations. (Environmental/Preservation Organization, Plymouth, MN - #15909.82000)

Most of the environmental consequences discussions are merely a recitation or continuation of the Affected Environment. This creates a document without much substance on impacts and is considered "verbose" under CEQ Regulation 1502.15. In addition, the discussions are rarely supported by evidence to determine the magnitude of the effects. (County Elected Official, Sheridan, WY - #16187.82000)

The DEIS's statement (analysis of the alternatives' effects on Wilderness) provides no underlying data or scientific references for the assumption that "timber harvest allowed in inventoried roadless areas enhance vegetative health and reduce fuel loading, thereby providing protection from pest, disease, and catastrophic wildfires spreading into designated wilderness (3-139). In fact, this statement can be refuted in most scientific literature. (Environmental/Preservation Organization, Cave Junction, OR - #16188.82000)

BY NOT CREATING A "VERBOSE" DOCUMENT

Most of the environmental consequences discussions are merely a recitation or continuation of the Affected Environment. This creates a document without much substance on impacts and is considered "verbose" under CEQ Regulation 1502.15. (County Elected Official, Sheridan, WY - #51045.54100)

Part 1502.15 Affected environment. Verbose descriptions of the affected environment are themselves no measure of the adequacy of an environmental impact statement.
FOREST SERVICE DRAFT EIS--The document contains many verbose descriptions of the affected environment that lack substance and objectivity. More quantitative information would have provided a much less verbose narrative. Another problem is that much of the information included in the effects section of each alternative is merely a continuation of the descriptions in the affected environment. (County Elected Official, Sheridan, WY - #51045.54100)

These excessively verbose sections are theoretical and speculative in violation of NEPA. (Individual, Whitefish, MT - #30417.54100)

Public Concern: The Forest Service should comply with the environmental standards of the National Environmental Policy Act by restricting motorized recreation on public lands.

The National Environmental Policy Act calls for federal agencies to help achieve national objectives which include…"Assure for all Americans safe, healthful, productive, and aesthetically and culturally pleasing surroundings." It is a violation of NEPA to allow motorized recreation in public lands plain and simple insofar as the use of these technological consumer toys destroys the aesthetics of the public settings in which they are operated. The Forest Service (and BLM) have been saying for the past 20 years that motorized recreation is a "legitimate" form of recreation. Society is increasingly challenging that assertion. Where is the NEPA documentation that

brought the public land managing agencies to the finding that it is legitimate to allow so few to willfully damage the aesthetic experience of so many? It does not exist! (Individual, Murphys, CA - #2972.91610)

Public Concern: Forest level decisions regarding the proposed rule should be subject to National Environmental Policy Act review and comment.

And finally, it must also be made clear in the final rule that all decisions regarding roadless areas made at the project and forest planning level including decisions regarding the status of inventoried roadless areas and unroaded areas and their suitability as wilderness, will be subject to full National Environmental Policy Act (NEPA) review and comment. (Environmental/Preservation Organization, Grants Pass, OR - #29018.54100)

Public Concern: The Forest Service should eliminate references to spiritual renewal in National Environmental Policy Act documents.

You also make references to spiritual renewal, which is completely out of line in a NEPA document. One man's junk is another man's treasure. While one person may find spiritual renewal in hiking to a remote area, another, perhaps elderly or disabled person, may only be able to find personal renewal by being able to drive to a scenic spot to relax and meditate. You are catering to elitism. (Individual, Challis, ID - #8034.10213)

Public Concern: The Forest Service should support legislation amending the National Environmental Policy Act.

That the Legislature of the State of South Dakota strongly encourages the Congress of the United States to expeditiously pass legislation amending the "National Environmental Protection Act" to allow small timber sales of the scale previously allowed by the Forest Service under categorical exclusion to be exempted from environmental assessment and impact statements to which larger timber sales are subjected. (State Elected Official or Staff, Pierre, SD - #27189.54100)

Public Concern: The Forest Service should clarify whether the National Environmental Policy Act process is unconstitutional.

The NEPA process is unconstitutional based on the following data: The National Environmental Policy Act does not provide for due process and operates outside of the Constitution. There are no provisions for just compensation. If anything, it only provided color of law. Under the common law right of due process and the Constitution, a statute must be reasonably expected to correct the evil prescribed. McInerney v Ervin (Fla.) 46 So 839. There must always be an obvious and real connection between the actual provisions of a regulation and its avowed purpose. Under the process, any action must be based upon the findings of fact and conclusion of law. Under the NEPA process, the agencies are not required to base their decisions or actions on the finding of facts or conclusion of law. (County Elected Official, Elko, NV - #17274.54100)

3.2.2 Endangered Species Act

Several respondents contend the proposed rule compromises the legal requirements of the Endangered Species Act (ESA). These respondents charge that the term "action" under the ESA includes "the promulgation of regulations." One individual claims the Forest Service failed to consult with other agencies over endangered species. "The Endangered Species Act requires federal agencies to formally consult with the National Marine Fisheries Service and the Fish and Wildlife Service if any action may affect listed species or critical habitat," proclaims this individual.

Public Concern: The Forest Service should comply with the Endangered Species Act.

DOES NOT COMPLY WITH THE ENDANGERED SPECIES ACT
The ESA requires the Forest Service to complete formal consultation before the final rule is adopted. The Endangered Species Act requires federal agencies to formally consult with the National Marine Fisheries Service and the Fish and Wildlife Service if any action may affect listed species or critical habitat. 50 C.F.R. [SEC.] 402.14(a). "Action" includes the promulgation of regulations. 50 C.F.R. [SEC.] 402.02. Formal consultation is required because the proposed regulation prohibiting entry into roadless areas may adversely affect listed species or the critical habitat.
Several examples demonstrate the need for formal consultation. First, the Canadian lynx was recently listed under the Endangered Species Act. The snowshoe hare is a major part of the lynx's diet. The snowshoe hare are abundant in early successional forests. Any limitation on timber harvest in roadless areas through direct prohibition or indirectly through limiting road construction will adversely affect the creation of habitat that favors production of food for lynx. In addition, the increased threat of wildfire and the erosion from catastrophic wildfires will affect listed fish species and may adversely affect critical habitat for red-cockaded woodpeckers and spotted owls in the Eastern slopes of the Cascades. Because the rule will adversely affect endangered species, formal consultation with NFMS and FWS must be completed before the final rule is adopted. (Timber Company or Association, Eugene, OR - #15879.54100)

3.2.3 Other

A few respondents advocate that the proposed rule should clarify whether state or federal governments have jurisdiction over environmental compliance of off-highway vehicle grants. These individuals assert that state/federal OHV collaboration inevitably ends with each agency claiming the other is responsible for compliance with environmental laws. Furthermore, asserts one individual, because many OHV projects are federal grantees, they claim exemption from environmental review, leaving enforcement of the federal environmental laws to legal action by local residents. In addition to the above concern, one mining group requests that the proposed rule consider interaction of Class I areas under the Clean Air Act.

Public Concern: The proposed rule should clarify whether state or federal governments have jurisdiction over environmental compliance of off-highway vehicle grants.

The state/federal OHV collaboration results in deliberate legal jurisdictional confusion. Federal agencies and the state each claim the other agency is responsible for compliance with state and federal environmental laws. Although all state-funded OHV projects are required to comply with the California Environmental Quality Act (CEQA), with rare exceptions, federal grantees claim their OHV grants are exempt from environmental review. As a result, compliance with the National Environmental Policy Act (NEPA) and California Environmental Quality Act (CEQA) may occur only when environmentalists or local residents threaten, or take, legal action. (Individual, Moreno Valley, CA - #13912.50000)

Public Concern: The Forest service should address the interaction of the proposed rule with Class 1 areas under the Clean Air Act.

The DEIS does not adequately address the interaction of Class I Areas under the Clean Air Act and the proposed rule. (Mining/Oil Company or Organization, Reno, NV - #15907.54200)

3.3 Federal Land Management Acts/Laws

This section deals with public concerns that address federal land management acts and laws. Concerns are broken down into the following subsections: Subsection 3.3.1 Federal Land Policy Management Act; Subsection 3.3.2 Multiple-Use and Organic Acts; Subsection 3.3.3 National Forest Management Act and Renewable Resources Planning Act; Subsection 3.3.4 Wilderness Acts; Subsection 3.3.5 Revised Statute 2477; Subsection 3.3.6 Alaska Concerns; Subsection 3.3.7 Other Acts; Subsection 3.3.8 Establish Review Panels.

3.3.1 Federal Land Policy Management Act

Many individuals are concerned that the proposed rule violates the Federal Land Policy and Management Act (FLPMA). These individuals state that the “Finding of No Significant Impact is ridiculous and absurd,” because the proposal constitutes a “withdrawal” and requires a “complete inventory and evaluation of the resources,” “an economic analysis,” and a description of “effects on state and local governments and on the local economy,” among other things. Furthermore, the withdrawal of more than 5,000 acres of land from public use requires the agency to “notify both Houses of Congress prior to withdrawal.” One county elected official requests the Forest Service consider the county’s general plan. In addition, a utility group requests the Forest Service consider utility corridors during planning in order to comply with FLPMA.

Public Concern: The Forest Service should address the proposed rule's violation of the Federal Land Policy and Management Act.

The Secretary of the Department of Agriculture and his staff violated the conditions of Chapter 35, Sec. 1714 of Title 24-Public Lands. This section of the Federal Land Policy and Management Act requires the Secretary to notify both Houses of Congress prior to withdrawal in aggregate, of more than 5,000 acres of land from public use. (Recreational Organization, Barre, VT - #9260.53300)

The Forest Service's Finding of no Significant Impact (FONSI) is ridiculous and absurd. This proposal is a withdrawal, and under the Federal Land Policy and Management Act (FLPMA of 1976), requires a complete report containing the following: a. Complete inventory and evaluation of the resources. b. Identification of present users and how they will be affected. c. An economic analysis. d. Effects on States, local governments, and local communities. e. A total mineral report, existing and future potential. (Individual, Cortez, CO - #15930.53300)

The proposed rule and other alternatives constitute a "withdrawal" under the FEDERAL LAND POLICY & MANAGEMENT ACT of 1976 (FLPMA), Section 204. A complete Section 204(c)(2) report will be required of USDA - Forest Service. The Draft EIS is wholly inadequate under the mandates of FLPMA Section 204(c)(2). Among other things the Draft EIS fails to provide a complete inventory and evaluation [204(c)(2)(2)]; the identification of present users and how they will be effected [204(c)(2)(3)]; an economic analysis [204(c)(2)(4)]; the consultations with other interested parties [204(c)(2)(7)]; a clear statement of the effects on State and local governments and on the local economy [204(c)(2)(8)]; and a report by a qualified mineral expert as to the general geology, known mineral deposits, past and present mineral production, mining claims, mineral leases, evaluation of future mineral potential, and present and potential market demands. Likewise, this same insufficiency leaves any comment in want of substantive information. Alternative 1 leaves the 54 million acres of undefined roadless areas in their status quo condition, and reduces the phenomenal expenditure of time and financial resources needed to complete and file the FLPMA 204(c)(2) report within the time period required by law. (Individual, Lakemont, GA - #14719.53300)

Public Concern: The proposed rule should comply with the Federal Land Policy and Management Act of 1976.

BY COORDINATING PLANS WITH OTHER AGENCIES, STATES, AND LOCAL GOVERNMENTS

The Federal Land Policy and Management Act of 1976 Sec. 202 requires the Secretary to coordinate the land use inventory, planning, and management of such lands with other agencies, States, and local governments. "Land use plans of the secretary under this section shall be consistent with State and local plans to the maximum extent he finds consistent with Federal law and the purposes of this Act." These laws are being ignored. Uintah County has a general plan, which has not been considered, by either the Bureau of Land Management nor the National Forest Service in recent decision-making processes. (County Elected Official, Vernal, UT - #43973.53300)

BY ESTABLISHING UTILITY PLANNING CORRIDORS

FLPMA requires consideration of designated utility corridors in forest planning. See FLPMA Section 503, 43 U.S.C. [section] 1763. In determining whether to designate utility planning corridors, FLPMA requires the Forest Service to consider such issues as national and state land use policies, environmental quality, economic efficiency, national security, safety, and good engineering and technological practices. Id. The rationale behind this statutory mandate is to "minimize adverse environmental impacts and the proliferation of separate rights-of-way" by establishing utility planning corridors on national forest system lands. Id. (Utility Group or Organization, No Address - #43981.53300)

3.3.2 Multiple-Use and Organic Acts

Several individuals claim the proposed rule violates the Multiple Use and Sustained Yield Act (MUSYA), which requires the secretary to "administer the land 'without impairment of the productivity of the land.'" These individuals further attest that "it would make little sense for land to be productive when it is unaccessible." One county agent supports a multiple use concept that includes "the sustained production of timber, watershed protection, fire protection, recreation and wildlife habitat." A business group advocates MUSYA's policy that considers "the relative values of the various resources in particular areas." Several mining organizations denounce the proposed rule for taking the consideration of "the relative values of the various resources in particular areas" a step too far. These organizations believe the proposed rule elevates "one resource (i.e., environmental resources) over all others." In contrast, recreational groups and environmental groups believe the non-impairment standard of MUSYA "requires that there be places where these resources [wildlife, fish habitat, water quality, recreation and wilderness] are preeminent." Some respondents believe MUSYA requires an area-by-area analysis. Several other respondents agree that national forests should be managed for the original purpose for which they were formed: as stated in the Organic Act, national forests were established for the purpose of securing favorable conditions of water flows and to furnish a continuous supply of timber.

Public Concern: The Forest Service should comply with the Multiple Use and Sustained Yield Act.

The DEIS cites to the MUSYA and states that the Secretary is supposed to administer the land "without impairment of the productivity of the land." A-7. This statement is arguably contradictory with the roadless initiative, as the purpose of the MUSYA is to ensure that the land remains productive. It would make little sense for land to be productive when it is unaccessible. The statute specifically calls for management of the resources, it would appear that management would be more difficult without roads. Multiple use and sustained yield would be almost impossible without roadways. (County Agency, Duluth, MN - #17287.53100)

The Vilas County Board of Supervisors supports forest management policies which assure the National Forests in Wisconsin and throughout the United States are managed under the concept of multiple use to provide the sustained production of timber, watershed protection, fire protection, recreation, and wildlife habitat as stated in the Organic Act of 1897, the Weeks Act of 1911, the Clark-McNary Act of 1924, the Multiple-Use Sustained Yield Act, and the National Forests Management Act. (County Agency, Eagle River, WI - #10679.50000)

This massive "lock-up" of resources is contrary to the multiple use and sustained yield mandate for the National Forest System. The rulemaking , by preventing the construction of roads needed to access timber, minerals, and grazing resources, essentially locks up 28% of the National Forest System for preservationist uses or non-uses. However, under the Multiple-Use Sustained-Yield Act of 1960 ("MUSYA"), the Secretary of Agriculture is "directed to develop and administer the renewable surface resources for the national forests for multiple use and sustained yield of the several products and services obtained therefrom." 16 U.S.C. 529. MUSYA defines "sustained yield" as the "achievement…of a high-level annual or regular periodic output of the various renewable resources." 16 U.S.C. 532. The NFMA did not alter this sustained-yield mandate, as it directs that the "Secretary shall…provide for multiple use and sustained yield of the products…in accordance with the Multiple-Use Sustained-Yield Act of 1960." 16 U.S.C. 1604(e)(i); see id. Sec. 1604(m), 1607, 1611 (other NFMA provisions illustrating the timber production intent). (Timber Company or Association, Kalispell, MT - #53304.53100)

The Forest Service proposed to substitute sustainability as the guiding principal for management actions through these proposed planning regulations, yet we can find little reference to this concept in current law. While we believe

sustainability is the right goal for the national forests, we do not believe it is the purpose of the national forests. It is a goal to guide how we manage, not what we manage to achieve. As a nation, we have promised the international community that all of our forests, public and private, would be managed sustainably by the year 2000. This is not to say that they will all be managed for the same purpose. Industrial forests will be managed for very different purposes than Wilderness areas, but both will be managed sustainably. This is why we believe the purposes of the national forests and public lands should be clarified. As a nation we know we want all of our forests managed sustainably, but SAF believes that as a nation, we have not agreed on what we are managing for on the national forests and public lands.
Based on our belief that the Forest Service is changing its mission through regulatory action and misinterpreting legislative mandates, if the Forest Service adopts these rules, they might be in violation of the Organic Administration Act of 1897 (16 U.S.C. 475), the Multiple-Use Sustained-Yield Act of 1960 (16 U.S.C. 528-31), and the Forest and Rangeland Renewable Resources Planning Act of 1974, as amended by the National Forest Management Act of 1976 and other laws (16 U.S.C. 1600-14). BOWEN V. GEORGETOWN HOSPITAL, 488 U.S. 204, 208 (1988), UNITED STATES V. LARIONOFF, 43 (U.S. 864, 873 n.1 (1977) and other court cases ruled that an agency's power to promulgate regulations is limited to the authority delegated by Congress. The new mandate the Forest Service wishes to give itself is not within the authority delegated by Congress. (Mining/Oil Company or Organization, Denver, CO - #29952.53000)

[T]he initiative will better fulfill the Forest Service's mandates under the Multiple Use and Sustained Yield Act and the National Forest Management Act than the current regime does where too many areas are open to road building. This is because the initiative will insure that the many uses, values, and qualities associated with roadless and unroaded areas (including watershed protection and protection of ecological and forest diversity) will be protected, or at least considered. (Environmental/Preservation Organization, Logan, UT - #16941.53100)

BY CONSIDERING THE VALUES OF ALL RESOURCES

MUSYA REQUIRES THAT "CONSIDERATION SHALL BE GIVEN TO THE RELATIVE VALUES OF THE VARIOUS RESOURCES IN PARTICULAR AREAS." 16 U.S.C. 529. MUSYA's legislative history amplifies that, in particular or localized areas relative values of the various resources will be recognized....In practice, the priority of resource use will vary locality by locality and case by case. In one locality timber use might dominate; in another locality use of range by livestock; in another outdoor recreation or wildlife might dominate. Thus, in particular localities the various resource uses might be given priorties because of particular circumstances. This is the meaning of the last sentence of section 2 of the bill [16 U.S.C 529]. (Business, Washington, DC - #29962.53100)

BY NOT ELEVATING ONE RESOURCE OVER ANY OTHERS

While the Forest Service is permitted under the MUSYA to prefer some uses over others based on relative resource values in particular areas, the Forest Service cannot, in a proposal that would impact the entire National Forest System, elevate one resource (i.e., environmental resources) over all others. The Forest Service's proposal would do exactly what Congress determined not to do--"upgrade" one resource over all others. (Mining Association, Reno, NV - #15907.53100)

The Forest Service's proposal would do exactly what Congress determined must not be done--give priority to and upgrade one resource over all others. The Forest Service cannot defend the proposed action as passing muster under its multiple use mandate by asserting that the proposal merely prohibits roads, not activities, because the practical implication of the road prohibition is that mineral exploration and mining activities will not be able to go forward. (Mining/Oil Company or Organization, Washington, DC - #52224.53100)

BY MEETING THE NON-IMPAIRMENT STANDARD

It is hard to believe that the principle of sustained yield and the non-impairment standard of the Multiple Use Sustained Yield Act contemplated the cutting over of all forests lands and then starting over again! MUSYA clearly requires a multiple use approach which also values wildlife, fish habitat, water quality, recreation and wilderness. MUSYA also requires that there be places where these resources are preeminent. The non-impairment standard of

MUSYA requires that these areas be maintained to retain these resources which are otherwise unavailable or threatened by timber harvest. (Recreational Organization, Missoula, MT - #17896.53100)

BY COMPLETING AN AREA-BY-AREA ANALYSIS

THE PROPOSED RULE AND DEIS VIOLATE REQUIREMENTS FOR ROADLESS AREA-BY-AREA ANALYSES. The NFMA and Multiple-Use Sustained-Yield Act ("MUSYA") require a roadless area-by-area analysis of the impacts of permanent roadless area designation and an area-by-area analysis of whether this truly maximizes multiple use benefits. (Timber Association, Eugene, OR - #15879.53000)

Public Concern: The Forest Service should manage the forests for watershed and timber extraction, as mandated by the Organic Act.

On a national level, the 1897 Organic Administration Act states that "no national forest shall be established except…for the purpose of securing favorable conditions of water flows, and to furnish a continuous supply of timber for the use and necessities of citizens of the United States."
We are aware that later statutes added to the multiple uses for which national forests may be managed, and also directed that timber harvesting be done in an environmentally responsible way. Those statutes did not, however, alter the primary principles of watershed protection and timber production established by Congress. (Business/Business Association, Glen Falls, NY - #2755.53200)

Comment: Page 1-2, 2nd paragraph--This paragraph is misleading. The first sentence states that "Watershed protection is one of the key reasons National Forests were created." This is not true. The Organic Act of June 4, 1897 states "No national forest shall be established, except to improve and protect the forest within the boundaries, or for the purpose of securing favorable conditions of water flows..." Favorable conditions for water flows means water quantity, not quality. The Act further states that "All waters within the boundaries of national forests may be used for domestic, mining, milling, or irrigation purposes, under the laws of the State wherein such national forests are situated." The role of protecting watersheds came later with passage of other laws.
Relief: These statements need to be clarified to represent an accurate reflection of the laws governing creation of the national forests. (Municipal Association, Cheyenne, WY - #15902.53200)

As the United States Supreme Court has held:
The legislative debates surrounding the Organic Administration Act of 1897 and its predecessor bills demonstrate that Congress intended national forests to be reserved for two purposes--"to conserve water flows and to furnish a continuous supply of timber for the people . . . NATIONAL FORESTS WERE NOT RESERVED FOR AESTHETIC, ENVIRONMENTAL, RECREATIONAL OR WILDLIFE PRESERVATION PURPOSES." UNITED STATES V. NEW MEXICO, 438 U.S. 696, 707-08 (1978) (emphasis added). Neither the proposed rule nor the accompanying DEIS discuss the conflicts between the proposed policy, the aforementioned statutory framework governing the Forest Service's activities, and the Supreme Court's interpretation of those statutes. (Business/Business Association, No Address - #43736.53200)

3.3.3 National Forest Management Act and Renewable Resources Planning Act

This section includes comments on the Transfer Act, the Renewable Resources Planning Act (RPA), the National Forest Management Act (NFMA), and the Planning Regulations. One individual claims the proposed rule violates the Transfer Act. Several respondents contend the proposed rule violates the "integrated planning process" of RPA. One professional society alleges it further violates RPA because revisions of Land and Resource Management Plans have not been coordinated with "the land and resource management planning process of state and local government."

Many respondents declare the proposed rule violates NFMA by "attempting to usurp the authority of the NFMA planning process." These respondents agree with congressional conclusions about NFMA that it is "'unwise to legislate national prescriptions' for all national forests because of the 'wide range of climatic conditions, topography, geologic and soil types.'" In addition to concerns that the proposed rule tries to usurp local authority over forest planning, many respondents express concern that NFMA is being violated in other ways. Several respondents agree that general rulemaking authority does "not eliminate the more specific requirements of NFMA." Furthermore, many respondents declare the proposed rule "violates the NFMA restriction that resource plans must be consistent with forest plans." Moreover, these respondents accuse the Forest Service of violating "the NFMA requirement for one integrated plan . . . for each national forest which "incorporate[s] in one document . . . all of the features required by NFMA.'" A few respondents further attest that "NFMA requires long range planning" be completed on a national forest level.

Many people express concern that the proposed rule violates the consultation and coordination requirements of NFMA. A few respondents claim the Forest Service violated NFMA by not fully informing Congress of the proposed rule before it was released for comment. Several groups and individuals denounce the proposed rule for its lack of coordination with stakeholders, tribes and Native Alaskans, and with other public planning efforts as required by NFMA. Respondents claim the proposed rule violates the NFMA regulations which require the agency "to provide for meaningful public participation," and "to give the public at least 30 days prior notice for all public participation activities." One group claims the Forest Service prevented "meaningful public participation" by rural persons.

A few respondents claim the Forest Service violates NFMA by not securing the views of a Committee of Scientists. Several individuals assert the proposed rule constitutes a "significant change in planning direction for 28% of the National Forest System" and requires "compliance with NFMA procedures for 'significant' plan amendments." Reduced timber harvest is one specific "significant" change mentioned by a few individuals.

Respondents express contrasting viewpoints on the environmental protection requirements of NFMA. Many timber industries believe that, per NFMA, the Forest Service has a "statutory duty" to "determine . . . harvesting levels," and claim further that the proposed rule will reduce the "'critical' timber sale level promised by forest plans," thereby violating NFMA. On the other hand many environmental organizations believe the Forest Service has "legal obligations to protect watersheds, provide for a diversity of plant and animal species, and maintain viable populations of species that are sensitive to human disturbance." These respondents believe the roadless initiative will help the Forest Service meet these legal requirements. Respondents also express contrasting viewpoints relative to maintaining roadway standards. A few respondents feel "it is reasonable and necessary for the USFS to prohibit new road construction in the roadless areas," inasmuch as continuing to build roads, without funding available to properly maintain them, would violate the agency's obligation to properly manage National Forest System lands. Other respondents feel the Forest Service should "either comply with the existing law and/or reexamine road design standards" rather than limit multiple use management.

One group believes the NFMA planning process "must be followed to preserve a roadless area or recommend Wilderness designation." Additionally, several respondents request that the proposed rule comply with the planning regulations by completing site-specific analysis, providing scientific analysis, and by consulting a committee of scientists. Finally, a few members of the public request the proposed rule use the current planning regulations' criteria for evaluating roadless areas.

Public Concern: The proposed rule should comply with The Transfer Act.

Any other proposal [than the no action alternative] violates all laws passed by Congress for management of the National Forest System including: The Transfer Act. (Individual, Soda Springs, ID - #43484.50000)

Public Concern: The Forest Service should meet the requirements of the Renewable Resources Planning Act and its supporting regulations.

All of the alternatives, except for the non action alternative violate the Forest and Rangelands Renewable Resources Planning Act (RPA) and its supporting regulations. For example, Section 6 (a) of the Act requires that the Agency coordinate revisions of land and resource management plans with the land and resource management planning process of State and local governments. This has not been done. In addition, 36 CFR 219.7 (d) requires the Agency to meet with representatives of local governments "at the beginning of the planning process to develop procedures for coordination." The Agency has been neglectful here, too. (Professional Society, No Address - #18172.44000)

The proposed rule violates the "integrated planning process" set forth in the Forest and Rangelands Renewable Resources Planning Act. (County Elected Official, Colusa, CA - #17259.53000)

The RPA provides that a Forest Plan may "be amended in any manner whatsoever after final adoption after public notice." 16 U.S.C. [section] 1604(f)(4). Because the Proposed Rule precludes Forest Supervisors from reconsidering or setting aside the nationwide prohibition, it contravenes this general statutory standard governing periodic changes in forest planning. (Utility Group or Organization, No Address - #43981.53000)

Public Concern: The Forest Service should respect local planning processes, as mandated by the National Forest Management Act.

We believe a more professional approach would be to refer final decisions for roadless area management to NFMA, Forest Plan revisions, so that local input would be made for specific roadless areas that gives careful consideration to the management of all resource values. Under this plan many of the inventoried roadless areas would remain, but some areas would allow for the desired management of other resources with some temporary or low standard roads that could be "put to bed" if necessary. Resource values such as developed and dispersed recreation, access to back country and other property, travel management, timber management and stand sanitation, wildlife, range, watershed, diversity of biological communities with a range of vegetative age classes, fire control, etc., would be evaluated. (Recreational Organization, Bozeman, MT - #7512.41240)

We employees are skeptical of Washington bureaucrats' attitude that they know what is best for the rest of us. We are concerned that the Roadless Area Initiative is not being processed as prescribed in the National Forest Management Act (NFMA) or the Wilderness Act. Many of the National Forests are in the process of revising their Forest Plans. This latest initiative has brought some local Forest planning teams to a halt.
It appears that the Roadless Area Initiative is attempting to usurp the authority of the NFMA planning process. NFMA planning is based on the premise that decision-making for local areas should be made with site-specific, scientific information for that particular area. But the Roadless Area Initiative is a "one plan fits all" prescription

and lumps 54 million acres together that are obviously quite different, both in physical aspects and in social/cultural dimensions. (Professional Society, Park Falls, WI - #43991.53800)

The NFMA similarly recognizes the need to consider relative values and local conditions. In the NFMA, Congress concluded that it was "unwise to legislate national prescriptions" for all national forests because of the "wide range of climatic conditions, topography, geologic and soil types," and different local perspectives on appropriate land uses in a particular national forest. (Timber Company or Association, Kalispell, MT - #53304.53800)

The NFMA gives the "resource manager the flexibility, through the planning process, to determine 'how' this direction can best be met on a specific land area with the opportunity to change or modify the management prescription based on new knowledge." S. Rep. No. 94-8993, at 26, 1976 U.S.C.C.A.N. 6685. This flexibility to provide direction in an individual forest plan and to modify direction (as the public interest changes) through plan revisions and amendments is reflected throughout 16 U.S.C. 1604(a)-(k).
Contrary to the [subsection] 1604(f) and (f)(5) direction that perceived changes in net public benefits be addressed through plan amendments and revisions (which themselves can be amended over time), the rulemaking would establish a permanent roadless area policy. Since [subsection] 294.12(a) permanently dictates the future of 28% of the National Forest System, it is contrary to the NFMA's design that each Forest Supervisor have the "flexibility, through the planning process, to determine" and alter multiple use direction over time. (Timber Company or Association, Kalispell, MT - #53304.53800)

Public Concern: The proposed rule should comply with the National Forest Management Act.

As explained elsewhere in NFA's comments, the roadless rule fails to comply with the National Forest Management Act because it results in a significant amendment or revision to the Forest Plans. The Oregon and Washington Wilderness Acts lend further support to the NFMA violation because they specifically direct that management for the released roadless areas be determined through the NFMA Forest Plans. (Timber Company or Association, Eugene, OR - #15879.51000)

NFMA makes the land and resource management plan the focal point for management of each national forest. The roadless initiative makes a mockery of the NFMA. The initiative would override most of the 124 forest plans the agency has prepared at great public expense. (Timber Company or Association, Eugene, OR - #15879.53800)

I object to the President's "roadless area" initiative, banning road construction or maintenance of existing roads, primarily because it is unconstitutional. Art. I sets forth that Congress only has the power to make laws, or to rescind laws, not the administrative branch. Therefore the President's action is illegal for it changes, indeed nullifies 16 USC 1600 Sec. 6 (e)(i). (Individual, Hot Springs, SD - #18429.52000)

Contrary to the [section] 1604(f)(4) and (f)(5) direction that perceived changes in net public benefits be addressed through plan amendments and revisions (which themselves can be amended over time), the rulemaking would establish a permanent roadless area policy. Since [section] 294.12(a) permanently dictates that each Forest Supervisor have the "flexibility, through the planning process, to determine" and alter multiple use direction over time. (Timber Company or Association, Eugene, OR - #15879.53800)

BY RECOGNIZING THAT RULEMAKING AUTHORITY DOES NOT NEGATE NATIONAL FOREST MANAGEMENT ACT REQUIREMENTS

GENERAL RULEMAKING AUTHORITIES LIKE 16 U.S.C. 551 DO NOT ELIMINATE THE MORE SPECIFIC REQUIREMENTS OF THE NFMA. The Forest Service has proposed, "forest plan amendments would not be required when the final rule becomes effective." 65 Fed. Reg. 30283. This is based on the rationale that existing "forest plan direction can be superseded by new laws and regulations." ID. This rationale is mistaken for two reasons. 1) First, while the [section] 294.14 regulation might be able to supersede the forest planning regulations in 36 C.F.R. Part 219, a regulation cannot supersede or negate the NFMA's STATUTORY requirements for consistency with forest plans, plan amendments with site-specific analysis and public review, etc. An "agency's power to promulgate legislative regulations is limited to the authority delegated by Congress." BOWEN V. GEORGETOWN UNIV. HOSPITAL, 488 U.S. 204, 208 (1988). "A regulation which...operates to create a rule out of harmony with the statute, is a mere nullity." UNITED STATES V. LARIONOFF, 431 U.S. 864, 873 n.12 (1977). Thus, the roadless area rulemaking is a mere nullity unless the Forest Service complies with the NFMA and Statewide Wilderness Act requirements described above (e.g., by conducting a roadless area-by-area review before adopting any forest plan amendment). (Timber Company or Association, Eugene, OR - #15879.53200)

The NFMA is a "single, COMPREHENSIVE piece of legislation, which provides the "framework for the development and implementation of management plans developed through an interdisciplinary approach." S. Rep. No. 94-893, at 10, 1976 U.S.C.C.A.N. 6671 (emphasis added). Since the NFMA provides comprehensive direction on the controlling nature of a forest plan and the consistency and plan amendment requirements, the more general rulemaking authorities do not authorize rules, which negate NFMA requirements. (Timber Company or Association, Eugene, OR - #15879.53200)

FAUSTO applies with persuasive force "where the scope of the earlier statute is broad but the subsequent statutes more specifically address the topic at hand." FDA V. BROWN & WILLIAMSON, 120 S. Ct. at 1306. SEE ALSO AMERICAN PETROLEUM INST. V. EPA, 52 F.3d 1113, 1119 (D.C. Cir. 1995) ("EPA cannot rely on its general authority to make rules necessary to carry out its functions when a specific statutory directive defines the relevant functions of EPA in a particular area"). Here, though [section] 551 does not provide broad rulemaking authority in contexts not involving forest plans, the more specific NFMA remains controlling on forest plan consistency and plan amendment requirements. A third principle is that, where two "provisions cannot be reconciled,...the more specific will take precedence over the more general." BUSIC V. UNITED STATES, 446 U.S. 398, 406 (1980). Thus, if there were a conflict between 16 U.S.C. 551 and 1604, the more specific NFMA duties on plan amendments take precedence and remain operative legal requirements. In sum, controlling statutory interpretation principles require compliance with BOTH [section] 551 and the NFMA/Statewide Wilderness Acts and other laws. While [section] 551 may allow rulemaking, it does not eliminate the NFMA/Statewide Wilderness Act duties to act consistently with forest plans or to complete a plan amendment before implementing a roadless area rule, which is inconsistent with a forest plan. (Timber Company or Association, Eugene, OR - #15879.53200)

BY MEETING CONSISTENCY REQUIREMENTS OF THE NATIONAL FOREST MANAGEMENT ACT

THE RULEMAKING VIOLATES THE NFMA RESTRICTION THAT RESOURCE PLANS MUST BE CONSISTENT WITH FOREST PLANS. The NFMA requires that, once the governing forest plan has been prepared at great public expense, all "resource plans...and other instruments for the use and occupancy of National Forest System lands shall be consistent with the land management plans." 16 U.S.C. 1604(i). The rulemaking is a "resource plan" within the meaning of [section] 1604(i) because it provides a long-term resource plan (no roads) for 54.3 million acres of inventoried roadless areas in the National Forest System. The rulemaking also is subject to the [section] 1604(i) "consistency" requirement because the rulemaking would control the "use and occupancy" of roadless areas. (Timber Company or Association, Eugene, OR - #15879.53800)

Since decisions on the future of each roadless area were made in each forest plan, any change in decisions regarding roadless areas must be made through the forest planning process (by a plan amendment or revision). The rulemaking would alter the multiple use allocations for over 17% of the National Forest System by precluding roads in areas where roads are permitted under the forest plan and by re-balancing multiple uses in favor of primitive recreation. Since this dramatic change in land use allocation and prescribed multiple uses is not consistent with the forest plans, adoption and immediate implementation of the rulemaking would violate the "consistency" requirement

of the NFMA. The "Forest Service cannot ignore the requirements of the Forest Plan" due to the "consistency" language in 16 U.S.C. 1604(i). (Timber Company or Association, Eugene, OR - #15879.53800)

Thus, under the plain language of 1604(i), the roadless area rulemaking could take effect immediately only where it is "consistent" with the 124 forest plans the Forest Service has formally adopted. The rulemaking is inconsistent with the governing forest plans because it would change management direction on "33.8 million acres of inventoried roadless areas" – the acreage where the existing forest plans allow "road building," but where the rulemaking would override the plans by prohibiting roads and road-dependent multiple uses. 65 Fed. Reg. 30276. This makes the rulemaking inconsistent with forest plans… (Timber Company or Association, Eugene, Kalispell, MT - #53304.53800)

BY CREATING "ONE INTEGRATED PLAN" FOR EACH FOREST

THE PROPOSED RULE VIOLATES THE NFMA REQUIREMENT FOR "ONE INTEGRATED PLAN." The Forest Service's refusal to reflect the roadless area direction in the forest plans through plan amendments creates another NFMA violation. The NFMA requires that there be "one integrated plan for each" national forest which "incorporate[s] in one document...all of the features required" by the NFMA. 16 U.S.C. 1604(f)(1). Those features include the "multiple use" allocations between, for example, "timber" uses and "wilderness" (or roadless) experiences. (Timber Company or Association, Eugene, OR - #15879.53200)

The direction for roadless areas must be incorporated into the forest plans to comply with [section] 1604(f)(1). The rulemaking would violate this NFMA duty because the roadless area direction would not be included in any "amendment or revision of any" forest plan. 36 C.F.R. [section] 219.14(b). As a result of this violation, when the public consults the forest plan that is the controlling document under the NFMA, the public will have inaccurate information on the allowed uses on at least 33.8 million acres of the National Forest System. (Timber Company or Association, Eugene, OR - #15879.53800)

BY COMPLETING LONG RANGE FOREST PLANNING AT THE FOREST LEVEL

The DEIS proposal violates NFMA because NFMA was passed to correct the deficiencies found by the Courts from RARE II that functional, single issue decision-making on National Forests nationwide was inefficient and not in the public interest. NFMA requires long range planning to be done on a national Forest-by-National Forest basis using scientific state-of-the-art systematic integrated planning systems, social assessments, and design arts, none of which were applied in this DEIS. (Individual, Whitefish, MT - #30417.53800)

BY INFORMING CONGRESS OF THE ROADLESS INITIATIVE

The Forest Service, by not fully informing Congress in advance (in either the Assessment, the Program, the Program report replacement under the Government Performance and Results Act, or the Statement of Policy) that a major roadless area initiative affecting 28% of the National Forest System would be proposed, has acted contrary to at least the spirit of 16 U.S.C. 1601, 1602, and 1606. (Timber Association, Medford, OR 13658.50000)

BY COORDINATING WITH STAKEHOLDERS

The Forest Service must comply with the NFMA's procedures for amending forest plans, which require, among other things, that planning activities be coordinated where practicable with owners of lands that are intermingled with or dependent for access upon National Forest System lands. 36 C.F.R. [section] 219.6(k). (Wise Use or Land Rights Organization, Anchorage, AK - #43414.53800)

BY COORDINATING PLANNING EFFORTS WITH TRIBES AND NATIVE ALASKANS

The Forest Service must comply with the NFMA's procedures for amending forest plans, which require, among other things, that planning activities be coordinated where practicable with owners of lands that are intermingled with or dependent for access upon National Forest System lands. 36 C.F.R. 219.6(k). Coordination with related planning efforts of Indian tribes, which includes Alaska Native Corporations, is mandated by the NFMA's implementing regulations in any event. SEE 36 C.F.R. [section] 219.7. This coordination includes reviewing

Native planning and land use policies, noting their objectives, impacts, and where they conflict with Forest Service planning, and developing alternatives for resolving such conflicts. ID. [sections] (c)(1)-(4). (Individual, Anchorage, AK - #43199.54100)

BY COORDINATING WITH OTHER PUBLIC PLANNING EFFORTS

Coordination with related planning efforts of Indian Tribes, which includes ALASKA Native Corporations, is mandated by the NFMA's implementing regulations in any event. SEE 36 C.F.R. [section] 219.7. This coordination includes reviewing Native planning and land use policies, noting their objectives, impacts, and where they conflict with Forest Service planning, and developing alternatives for resolving such conflicts. Id. [sub-section] (c)(1)-(4). (Wise Use or Land Rights Organization, Anchorage, AK - #43414.53800)

BY PROVIDING MEANINGFUL PUBLIC PARTICIPATION

The regulations also provide that the Forest Service must give the public at least 30 days' prior notice of all public participation activities conducted in connection with such plan amendments. 36 C.F.R. 219.6(g). (Individual, Anchorage, AK - #43199.54100)

NFMA regulations, developed under 16 U.S.C. [section] 1604(d), require the agency to provide for meaningful public participation in the development, review or revision of a forest plan. (36 C.F.R. 219.6). Contrary to both these regulations, the Forest Service has failed to provide adequate information to the public to meaningfully participate in the scoping process and to have any ability to help define the alternatives considered in the DEIS. (Individual, Anchorage, AK - #43199.54100)

Even if the Forest Service has the authority to amend forest plans by a national-level rulemaking, 36 C.F.R. 219.6(g) requires a 60-day scoping period prior to proposing to amend a regional plan. Since national-level planning is even more significant than regional planning, the Forest Service must provide a comparable scoping period. Accordingly, the scoping period should extend for 60 days from the time the Forest Service provided all the relevant information (e.g., 60 days from identification of the specific areas within each national forest that the Forest Service considers to be covered by the proposed rule.) (Timber Company or Association, Eugene, OR - #15879.53800)

This discrimination is further against rural people, persons without access to computers, persons in certain socio-economic strata and to persons of certain race. These are expensive documents to print, mail and to review. We believe that this situation is in fact part of the intent of the Clinton-Gore Administration. The informational meetings held regarding this DEIS were not in compliance with the legal requirements of NEPA and NFMA. Public involvement by rural persons has been deliberately discouraged with these discriminatory actions. (Business Association, Beaverton, OR - #52230.54500)

BY SECURING THE VIEWS OF A COMMITTEE OF SCIENTISTS

Since the roadless rule does implicate the NFMA and forest planning, the Forest Service also is violating 16 U.S.C. 1604(h) by not securing the views of a "committee of scientists" on this rulemaking. (Timber Company or Association, Eugene, OR - #15879.53800)

BY DEVELOPING AN AMENDMENT FOR SIGNIFICANT CHANGES

The significant change in planning direction for 28% of the National Forest System requires compliance with NFMA procedures for "significant" plan amendments. The NFMA requires more extensive analyses and public consideration before adopting a "significant" change in planning direction. Since this rulemaking would permanently affect the planning direction for 28% of the National Forest System (the prohibition of roads in inventoried roadless areas), the rulemaking clearly makes a significant change in planning direction.
Congress has prescribed that, "if such amendment would result in a significant change in such plan, [there must be compliance] with the provisions of subsections (e) and (f) of this section and public involvement comparable to that required by subsection (d)." 16 U.S.C. 1604(f)(4). As 1604(e) and (F) provide, and 36 C.F.R. 219. 11 (f) and 219.12(a) and the Planning Handbook confirm, a proposed significant change in planning direction must first be

assessed through the same process required for developing a forest plan. (Timber Company or Association, Kalispell, MT - #53304.53800) (New Sub)

NFMA requires a significant Forest Plan amendment when Forest Plan outputs are substantially changed. The proposed rule will result in roadless lands becoming unavailable for timber harvest (DEIS, page 184). As a result the allowable sale quantities (ASQ) will be reduced on every Forest with roadless lands being affected by the proposed rule. The DEIS fails to address this requirement. In keeping with NEPA this effect must be displayed in the EIS for each unit (Forest). This information (ASQ by roaded and roadless lands) is readily available on each Forest. This is the real loss of timber opportunity, not some plucked out of the sky figure (DEIS, page 185). (Individual, Great Falls, MT - #28425.53800)

As [section] 1604(e) and (f) provide, and 36 C.F.R. 219.11(f) and 219.12(a) and the Planning Handbook confirm, a proposed significant change in planning direction must first be assessed through the same process required for developing a forest plan. This would include a ROADLESS AREA-BY-AREA ANALYSIS under 36 C.F.R. 219.17-.21 and in an environmental impact statement ("EIS") to assess: (1) the biological and socio-economic impacts of the proposed change in planning direction on each roadless area (e.g., increased fire risk, loss of the 16 U.S.C. 500 timber revenues that many localities depend on for support of public schools); and (2) whether net public benefits are maximized by keeping a particular roadless area roadless or by allowing road-dependent multiple uses. This site-specific roadless area-by-area analysis is missing in the proposed rule and DEIS. Its absence violates the prescribed NFMA procedures for consideration of significant changes in planning direction. (Timber Company or Association, Eugene, OR - #15879.54000)

BY SETTING TIMBER HARVEST GOALS

The Forest Service can meet its statutory duty that a forest plan "shall...determine...harvesting levels" (16 U.S.C. 1604(e)(2)) only if the plan sets "logging goals" and not merely a ceiling. OHIO FORESTRY ASS'N V. SIERRA CLUB, 523 U.S. 726, 729 (1998). Obviously, a forest plan which merely states an ASQ ceiling amount that the agency does not intend to provide in practice would not permit the private sector to "plan their operations" and does not comply with RESOURCES LTD. (Timber Company or Association, Eugene, OR - #15879.53800)

The NFMA provides that a forest plan "shall…determine… harvesting levels." 16 U.S.C. 1604(e)(2). The NFMA "assures that timber harvest levels are based on management plans" and are not set outside the context of publicly reviewed plans. S. Rep. No. 94-893, at 37 (1976), reprinted in 1976 U.S.C.C.A.N. 6696. Since only a forest plan can set a timber sale level, and change to a timber sale level requires a plan amendment. E.g., Friends of the Bow v. Thompson, 124 F. 3d 1210, 1214 (10th Cir. 1997) ("the ASQ [the timber sale level] may be modified, but only through a revision [or amendment] of a the forest plan, with full public participation") (emphasis added): Sierra Club v. Cargill, 11 F.3d 1545, 1547-49 (10th Cir. 1993).
"Proper determination of the [expected level for timber sales], perhaps more than any other element of forest-wide planning, is critical in providing 'long-term direction'" because portions of the timber industry "plan their operations" and investments in sawmill capacity, etc., based on the expected timber supply from a national forest. Resources Ltd. Inc. v. Robertson, 35 F.2d 1300, 1305 (9th Cir. 1993) Therefore, before the roadless area rulemaking could reduce the "critical" timber sale level promised by forest plans, the agency must consider the impacts of this reduction on local timber-dependent communities in forest plan amendments. Until that occurs, timber "[h]arvest levels are to be based on the currently approved plans." S. Rep. No 94-893, at 37 (1976), reprinted in 1976 U.S.C.C.A.N. 6696. ((Timber Company or Association, Kalispell, MT - #53304.53800)

BY PROTECTING THE ENVIRONMENT

It is also within the USFS's authority under the Organic Act and other laws to prohibit activities in roadless areas and other sensitive NFS lands in order to protect values and resources. Protecting roadless areas will help the USFS meet its legal obligations to protect watersheds (16 USC 1604(g)(3)(E)), provide for a diversity of plant and animal species (16 USC 1604(g)(3)(B)), and maintain viable populations of species (e.g., wolverine) that are sensitive to human disturbance (36 CFR 219.19). (Environmental/Preservation Organization, Laramie, WY - #43735.50000)

BY MAINTAINING ROADWAY STANDARDS

16 USC 1608(c) requires the USFS to ensure the transportation system throughout the NFS is properly maintained to ensure safety and minimum environmental impact. Since the USFS currently has an $8-10 billion backlog of maintenance needs on existing roads, it is reasonable and necessary for the USFS to prohibit new road construction in the roadless areas; to continue building roads--when the agency knows it will not have funds to properly maintain those roads along with the existing roads--would violate the USFS's legal obligations under 16 USC 1608(c) as well as the agency's common-law stewardship obligations to properly manage the NFS lands.
(Environmental/Preservation Organization, Laramie, WY - #43735.51000)

Under the NFMA, any new roads are required by law to have their vegetative cover reestablished within ten years after the termination of the contract, permit, or lease unless they are to become part of the permanent road system. (SEE 1976 U.S. Cong. & Adm. News 6662, 6678). The risks and impacts discussion in the proposed rule simply ignores the requirement that any road must be designed and revegetated in a manner that restores the area. If there are adverse impacts resulting from roads built since 1976, then the solution is for the Forest Service to either comply with existing law and/or reexamine road design standards--not to remove the lands from multiple use management.
(County Agency, John Day, OR - #16087.53800)

BY FOLLOWING NATIONAL FOREST MANAGEMENT ACT PROCESSES IN DESIGNATING WILDERNESS AND ROADLESS AREAS

At the very least, the statutory language and legislative history reinforces that the "National Forest Management Act planning process" must be followed to preserve a roadless area or recommend Wilderness designation. The roadless area rulemaking does not do so.
Additionally, since Congress objected to even "Statewide" actions concerning the roadless areas passed over for Wilderness designation, the rulemaking's preemptive nationwide action with respect to all passed-over roadless areas is contrary to legislative direction and intent. Because Congress did not want any "RARE III" review, which merely recommended changes in the status of roadless areas, Congress certainly did not want any national rulemaking, which dictates the future status of 54.3 million acres of inventoried roadless areas. (Timber Company or Association, Eugene, OR - #15879.54000)

Public Concern: The proposed rule should comply with the planning regulations.

36 C.F.R.sec 219.7(a) The Forest Service is obligated to coordinate with equivalent and related planning efforts of local governments.
36 C.F.R.sec 219.7(d) The Forest Service's obligated to meet with local governments, to establish process for coordination. At a minimum, coordination and participation with local governments shall occur prior to Forest Service selection of the preferred alternative.
36 C.F.R. sec 219.7(c) The Forest Service is obligated, after review of the county plan, to display the results of its review in an environmental impact statement. See also C.F.R. sec 1502.16(c) and 1502.2.
36 C.F.R.sec 219.7 (c) (4) The Forest Service is obligated to consider alternatives to its proposed alternative if there are any conflicts with county land use plans.
36 C.F.R.sec 219.7(f) The Forest Service is required to implement monitoring programs to determine how the agency's land use plans affect communities adjacent to or near the national forest being planned.
(Business/Business Association, No Address - #54308.50000)

Direction on the studies required during forest planning logically belongs in the forest planning rules of 36 C.F.R. Part 219. The proposed planning rules identify the types of evaluations required when revising a forest plan. SEE 64 Fed. Reg. 54100-01, 54107-08, proposed [sections] 219.9, 219.12-219.22, 219.27. Particularly because proposed [section] 219.27 specifies that "roadless areas" can be designated and additional Wilderness areas recommended during forest planning, the Part 219 rules are the logical place for identifying any studies required of roadless areas during forest planning. (Timber Company or Association, Eugene, OR - #15879.53800)

BY COMPLETING SITE SPECIFIC ANALYSIS

Lack of site-specific analysis. Other sections of the proposed planning rules require site-specific environmental and economic analysis in plan amendments before changing the direction of the forest plan. See 64 Fed. Reg. 54098-109 (Oct. 5, 1999), proposed Sec. 219.3-219.10, 219.20, 219.21, 219.30, 219.31. The lack of site-specific analysis of the effects of the roadless are rules on forest health and other resource values is another way in which the roadless area rulemaking is inconsistent with the Forest Service's own proposed planning rules. (Timber Company or Association, Kalispell, MT - #53304.53000)

BY PROVIDING SCIENTIFIC ANALYSIS

Lack of scientific analysis and justification. The agency's proposed planning rules emphasize the role of science and the need for detailed analyses before taking actions affecting the National Forest System. See 64 Fed. Reg. 54095-54112 (Oct. 5, 1999), particularly proposed Sec. 219.2, 219.8, 219.9, 219.19-219.24. Those sections emphasize the need for scientific "assessments," for "science consistency evaluations," and for a strong role of "scientists in planning."
Yet, the Forest Service is proposing permanent prescriptions for 54.3 million roadless acres without providing: (1) a convincing scientific explanation as to why each and every roadless acre must be kept roadless; or (2) a roadless area-by-area analysis of that prescription's impacts on issues such as protection of the forest against…disease, providing sufficient roaded recreation in the future, meeting future needs for timber and mineral resources, public desires for the use of each roadless area, etc. Thus, this rushed rulemaking on roadless areas is inconsistent with the study and analysis objectives in the contemporaneous planning rulemaking. (Timber Company or Association, Kalispell, MT - #53304.53000)

BY CONSULTING A COMMITTEE OF SCIENTISTS

Further, consistent with 16 U.S.C. Sec. 1604 (h), a Committee of Scientists helped to shape the proposed planning rules. See 64 Fed. Reg. 54075 (Oct. 5, 1999). A Committee of Scientists has not been consulted on the roadless area rules. The Forest Service should not proceed further with the roadless area rules until a Committee of Scientists reviews them: (1) to determine whether there is an objective biological need for a roadless area rulemaking of this magnitude; (2) to provide advice on whether broader exceptions from the roadless area policy should be allowed to protect forest health; and (3) to remove or minimize the conflicts between the roadless area and planning rules. (Timber Company or Association, Kalispell, MT, - #53304.53000)

Public Concern: The proposed rule should use the current planning regulations' criteria for evaluating roadless areas.

The regulations at 36 CFR 219.17 currently set forth important criteria for the "Evaluations of Roadless Areas." The USFS's proposed revision to the NFMA planning regulations at 36 CFR Part 219 would omit these important roadless evaluation criteria. Yet the agency is not proposing to include these criteria in the roadless area regulations at 36 CFR 294. The USFS's Roadless Area Conservation Rule must include the roadless criteria currently established in 36 CFR 219.17 if section 219.17 is to be deleted from the NFMA Planning Rules. (Environmental/Preservation Organization, Laramie, WY - #43735.72200)

3.3.4 Wilderness Acts

Many opponents of the proposed rule write to remind the Forest Service that it is legally bound to abide by the Wilderness Act of 1964, as well as state wilderness acts; and that under these acts the proposed rule is clearly illegal. Specific state wilderness acts mentioned are the California Wilderness Act of 1984, the Oregon and Washington Wilderness Acts, the Wyoming Wilderness Act, the Montana Wilderness Study Act, the Colorado Wilderness Act, the Utah Wilderness Act

of 1984, Idaho Wilderness Act, Michigan Wilderness Act, Nevada Wilderness Act, and the New Hampshire Wilderness Act of 1994.

Additionally, one individual asks the Forest Service to disclose the legislative history that allowed 21 states to pass legislation increasing wilderness areas; another requests support for the proposed American Red Rock Wilderness Act.

Public Concern: The Forest Service should abide by the Wilderness Act of 1964.

Don't violate the Wilderness Act of 1964, which set the national policy that only Congress may designate wilderness. (Individual, Durango, CO - #745.41200)

Page 3-138, Alternative 1--This discussion states that the "...trend of shifting human patterns, increased resource management activity, and reduced ecological integrity in and around potential and designated wilderness will increase the threat to their wilderness character." The United States has had wilderness since the Wilderness Act of 1964 was passed by Congress. Why all of a sudden do we now have a problem?
RELIEF: The Forest Service must provide evidence where these so called threats have compromised the integrity of the wilderness preservation system since the inception of the Wilderness Act in 1964. (County Elected Official, Basin, WY - #53400.43980)

[D]EIS and proposed policy are inconsistent with the management direction for roadless areas in Idaho and Montana contained in the statute and legislative history of the following public laws:
Wilderness Act of 1964 (P.L. 88-577)--Which reserves to the Congress the authority to designate Wilderness Areas. This proposal is the equivalent of Wilderness designation for these areas.
Endangered American Wilderness Act of 1976 (P.L. 94-588)
Central Idaho wilderness Act of 1980 (P.L. 96-312)--Which identifies specific roadless areas to be managed for multiple uses including timber harvest and access.
Lee Metcalf (P.L. 98-140) and Rattlesnake (P.L. 96-476)--Which specifically release certain roadless lands in Montana for multiple-use purposes. (Timber Company or Association, Coeur d'Alene, ID - #15899.53000)

In table 2-2 under Impacts to designated or Potential Wilderness for the preferred alternative the following information is provided:
Maintaining inventoried roadless areas would sustain a low level of threat to wilderness values and protect land between Wilderness areas and developed land. Opportunities for recreation that require remote characteristics, but are of a less restrictive nature than wilderness, would be maintained.
The quote above implies inventoried roadless areas will provide a buffer between developed land and Wilderness. This is a violation of FS policy. Forest Service Manual (FSM) 2320.3 states:
Because wilderness does not exist in a vacuum, consider activities on both sides of wilderness boundaries during planning and articulate management goals and the blending of diverse resources in forest plans. DO NOT MAINTAIN BUFFER STRIPS OF UNDEVELOPED WILDLAND TO PROVIDE AN INFORMAL EXTENSION OF WILDERNESS. Do not maintain internal buffer zones that degrade wilderness values. Use the recreation opportunity spectrum (FSM 2310) as a tool to plan adjacent land management. [emphasis added]
FSM 2320.3 could also be violated by creating an informal extension of wilderness, if inventoried roadless and other unroaded areas are managed ". . . to sustain their roadless characteristics, they are still the reservoir for future designated wilderness areas." Wilderness area management is more restrictive in the type of activities allowed. The New Mexico Department of Agriculture (NMDA) believes if inventoried roadless areas are managed to promote wilderness characteristics there will be further restrictions placed on livestock permittees and lessees of public land. (State Agency, Las Cruces, NM - #17624.64412)

Public Concern: The proposed rule should comply with state wilderness acts.

Since the Statewide Wilderness Acts also require that roadless areas be managed pursuant to forest plans, they also require plan amendments here and preclude taking action by a national rule alone. Designating lands for inclusion in the National Wilderness Preservation System and assessing whether to administratively retain currently-unroaded lands in roadless status are contentious public policy issues. People who depend on the national forests for economic multiple uses (such as loggers, ranchers, and miners) do not like to see large areas of their national forests effectively declared off-limits to their livelihoods due to absence of roads needed to access the natural resources. Additionally, many visitors to national forests prefer, or only have the physical ability or time to engage in, roaded recreation. This explains why, after Congress resolves Wilderness System issues in a Statewide Wilderness Act, it includes language "releasing" undesignated roadless areas for the multiple use management provided for in the forest plan. (Timber Company or Association, Kalispell, MT - #53304.57100)

The Forest Service needs to complete a legal analysis of why the preferred alternative is not in violation of several statewide wilderness acts. (University/Professional Society, Anchorage, AK - #43416.57100)

The roaded uses of previously inventoried (and passed over) roadless areas "authorized in the [forest] plan in effect can proceed until a new plan is implemented" after a plan amendment. The Forest Service cannot alter a forest plan's provisions on multiple uses in roadless areas by a national rulemaking alone.
Thus, by attempting to change allowed land uses for released roadless areas outside the forest planning process; this proposed rule is unlawful under the plain language and legislative intent of the Statewide Wilderness Acts. (Mining/Oil Company or Organization, Washington, DC - #52224.57100)

SINCE THE STATEWIDE WILDERNESS ACTS ALSO REQUIRE THAT ROADLESS AREAS BE MANAGED PURSUANT TO FOREST PLANS, THEY ALSO REQUIRE PLAN AMENDMENTS HERE AND PRECLUDE TAKING ACTION BY A NATIONAL RULE ALONE. (Timber Company or Association, Eugene, OR - #15879.54000)

The Forest Service cannot alter a forest plan's provisions on multiple uses in roadless areas by a national rulemaking alone. This rulemaking, in attempting to change allowed land uses for released roadless areas outside the forest planning process, is unlawful under the plain language and legislative intent of the Statewide Wilderness Acts. (Timber Company or Association, Eugene, OR - #15879.54000)

CALIFORNIA WILDERNESS ACT OF 1984

The Colusa County Board of Supervisors is opposed to the Roadless Area Conservation Proposed Rule. This rule is a blatant violation of the language contained in the California Wilderness Act of 1984. (County Elected Official, Colusa, CA - #17259.53000)

I would point out that the Record of Decision for the Eldorado National Forest Land and Resource Management Plan was signed by the regional forester on January 6, 1989. Alternative A was selected as the basis for the forest plan which will be followed for the next 10-15 years. All roadless areas not recommended for further consideration for wilderness were released for various management options as they had been released under the 1984 California Wilderness Bill. Therefore, your consideration of them in this roadless area review is in violation of a Congressional act. Also, your project should have been carried out through the 1976 National Forest Management Act and not a separate disjointed, poorly evaluated and unsubstantiated paper. (Individual, Camino, CA - #28691.50000)

OREGON AND WASHINGTON WILDERNESS ACTS

VIOLATES THE OREGON AND WASHINGTON WILDERNESS ACTS
Oregon Wilderness Act (OWA) 1984, Pub. L. No. 98-328, 98 Stat. 272 (1984); Washington State Wilderness Act (WWA) 1984, Pub. L. No. 98-339, 98 Stat. 299 (1984). The Acts released roadless areas for multiple use management under forest plans, prohibited the consideration of the roadless areas for Wilderness until the plans are revised, prohibited the Forest Service from further statewide reviews of roadless areas or conducting a RARE III,

and prohibited making roadless areas buffer zones around existing Wilderness. The Chief's roadless rule violates all these provisions of the Oregon and Washington Wilderness Acts principally because the road prohibition prevents multiple use management leaving the roadless areas as de facto wilderness. First, the Acts were intended to "ensure that [released roadless areas] . . . be available for non-wilderness multiple uses." SEE OWA, WWA, Section 2(b). Most importantly, Congress directed that the released roadless areas "shall be managed for multiple use in accordance with land management plans." OWA, Sec. 7(b)(3); WWA, Sec. 5(b)(3). (Timber Company or Association, Eugene, OR - #15879.51000)

The Oregon and Washington Wilderness Acts emphasize that roadless areas "need not be managed for purposes of protecting their suitability for wilderness designation prior to or during revision of the initial land management plans." OWA, Sec. 7(b)(3); WWA, Sec. 5(b)(3). The roadless rule essentially is a means to protect the suitability of the roadless areas for wilderness designation until the next revisions of forest plans. Congress explicitly forbids the Forest Service from restricting activities in roadless areas merely to keep the areas available for wilderness consideration when the plans are revised. (Timber Company or Association, Eugene, OR - #15879.51000)

The Oregon and Washington Wilderness Acts prohibit the Department of Agriculture from conducting any further statewide roadless area reviews of lands for the purpose of determining their suitability as wilderness. OWA Sec. 7(b)(5); WWA Sec. 5(b)(5). (Timber Company or Association, Eugene, OR - #15879.51000)

The Chief, through the roadless rule, essentially reallocates the roadless areas to de facto wilderness and the nationwide review is in effect, a state-by-state review of the particular roadless areas of a RARE III in violation of OWA and WWA. SEE Appendix to EIS showing roadless areas by state. (Timber Company or Association, Eugene, OR - #15879.51000)

The Wilderness Acts preclude the creation of buffer zones by prohibiting activities in roadless areas adjacent to existing wilderness. OWA Sec. 6; WWA Sec. 9. The roadless rule violates this provision of the Wilderness Acts. (Timber Company or Association, Eugene, OR - #15879.51000)

WYOMING WILDERNESS ACT

One example is the Wyoming Wilderness Act of 1984 ("WWA"), 98 Stat. 2807. It designated nearly 1 million acres of Wilderness areas in Wyoming. As the QUID PRO QUO for allocating this acreage for Wilderness use, the WWA released remaining roadless areas in national forests in Wyoming for the multiple uses identified in the relevant forest plan. WWA [section] 401(b)(3), which is part of "Title IV--Release Of Lands For Multiple Use Management," states that:
(b) On the basis of such review, Congress hereby determines and directs that...
1) areas in the State of Wyoming reviewed in such final environmental impact statement or referred to in subsection (d) and not designated wilderness study upon enactment of this Act shall be managed for multiple use in accordance with land management plans pursuant to section 6 of the [RPA]....98 Stat. 2811-12. (Timber Company or Association, Eugene, OR - #15879.54000)

Since WWA [section] 401(b)(3) directs that the released roadless areas "shall be managed for multiple use in accordance with...[forest] plans," it only allows inventoried roadless areas to be managed as directed in a forest plan. Altering the forest plan's multiple use decisions regarding uses of roadless areas through a national rule, and without first amending the forest plans, would violate WWA [section] 401(b)(3) and the similar provisions in other Statewide Wilderness Acts. ACCORD Anderson & Montcrief, 76 DENV. U. L. REV. at 421 ("prior to or during revision of the NFMA plans, all RARE II areas that are not designated as wilderness or for special management in the legislation were to be managed IN ACCORDANCE WITH THE PLANS") (emphasis added). In effect, the Statewide Wilderness Acts prohibit changing a forest plan's direction on permissible multiple uses of released roadless areas through a national rulemaking alone. (Timber Company or Association, Eugene, OR - #15879.54000)

MONTANA WILDERNESS STUDY ACT

Moreover, Congress often includes explicit restrictions on development in legislation requiring study of potential wilderness areas. For example, Section 3(a) of the Montana Wilderness Study Act, Pub. L. 95-150, provides,

"Except as otherwise provided in this section and subject to existing private rights, the WILDERNESS STUDY AREAS designated by this Act shall, until Congress determines otherwise, be administered by the Secretary of Agriculture so as to maintain their presently existing wilderness character and potential for inclusion in the National Wilderness Preservation System." (Emphasis added.) Absent such an explicit statutory restriction, however, the Wilderness Act provides no limitation on rights-of-ways or other multiple-use activities in areas not designated as wilderness areas. (Utility Group or Organization, No Address - #43981.53000)

COLORADO WILDERNESS ACT

Willsource Enterprise has particular concern with the impacts of the proposed rule on oil and gas leases which it owns in the White River National Forest. We believe that, to the extent that the proposed rule forbids uses requiring road construction or reconstruction in areas which were previously analyzed in the RARE II process, the rule will violate the intent of Congress expressed in the Colorado Wilderness Act adopted in 1980 (Public Law 96-560). That law included as one of its purposes to "ensure that certain other National forest system lands in the State of Colorado be available for non-wilderness multiple uses" #101(b)(2). To the extent that the Forest Service's proposed rule will prevent multiple uses in these areas outside designated wilderness, the rule clearly contravenes congressional intent as established in the 1980 Colorado Wilderness Act. See also #107(b)(2) and (3) of that law. Moreover, to the extent that the proposed rule covers lands in Colorado, its adoption would constitute a violation of section 107(b)(4) of the Colorado Wilderness Act of 1980 which states as follows: "Unless expressly authorized by Congress the Department of Agriculture shall not conduct any further statewide roadless area review and evaluation of National Forest System lands in the State of Colorado for the purpose of determining their suitability for inclusion in the National Wilderness Preservation System." (Individual, Denver, CO - #29016.57100)

UTAH WILDERNESS ACT OF 1984

Most of the recent state wilderness acts prohibit the establishment of buffers around federally-designated wilderness. Standard language precluding buffers is included in many wilderness acts. The language contained in section 303 of the Utah Wilderness act of 1984 (Public Law 98-428, 98 Stat. 1657) is typical. It reads: "Congress does not intend that designation of wilderness areas in the State of Utah lead to the creation of protective perimeters or buffer zones around any wilderness area. The fact that nonwilderness activities or uses can be seen or heard from areas within the wilderness shall not, of itself, preclude such activities or uses up to the boundary of the wilderness area."
As the growing trend is for congress to include language precluding the establishment of buffer zones in recent wilderness acts, it is obvious that Congress is reserving to itself the ability to create wilderness areas and prevent the blurring of the boundaries of such areas.
In addition, the Forest Service Manual on Recreation, Wilderness, and Related Resource Management explicitly forbids the maintenance of "buffer strips of undeveloped wildland to provide an informal extension of wilderness." FSM section 2320.3(5). But that is exactly what the Forest Service is attempting by this rulemaking. The DEIS states: "A substantial number of inventoried roadless areas are near and in close proximity to designated wilderness areas…These areas serve as a natural transition between lands affected by resource management activities and lands affected substantially by natural processes. Maintaining the unroaded character of these transition areas will sustain existing levels of wilderness values." DEIS at 3-137. (Mining/Oil Company or Organization, Washington, DC - #15877. 53400)

IDAHO WILDERNESS ACT

The Clearwater National Forest maps (see DEIS Volume 2, p. 63) are inaccurate with regard to whether the forest plan allows for road construction and what areas are recommended for wilderness. Under the settlement agreement on forest plan litigation brought against the Clearwater National Forest, the Clearwater National Forest agreed that all areas proposed by any member of the Idaho delegation for wilderness in legislation are to be managed as recommended wilderness (management category B2) until wilderness legislation is passed or the forest plan is amended. There are no exceptions. (see Civil No. 93-0043-S-HLR, Stipulations of Dismissal, The Wilderness Society et al. v. F. Dale Robertson et al.) The settlement agreement section II. a. states: "The Forest Service agrees, effective immediately, not to approve any timber sale or road construction project decisions within the area covered by the proposed 'Idaho Wilderness, Sustainable Forest and Communities Act of 1993,' H.R. 1570 and THAT SUCH LANDS WILL BE MANAGED ACCORDING TO FOREST PLAN STANDARDS AND GUIDELINES FOR RECOMMENDED WILDERNESS (MANAGEMENT AREA B2). The Forest Service further agrees to apply

these management prescriptions to any area(s) added by amendment to H.R. 1570, and to any area(s) included in any other Idaho wilderness proposal introduced in Congress by any member of the Idaho delegation." (emphasis added.) The map does not reflect this reality. Additional lands fall into the category of no road building and/or recommended wilderness which were included in the above referenced legislation. (Environmental/Preservation Organization, Moscow, ID - #28913.50000)

MICHIGAN WILDERNESS ACT

The language in the Michigan Wilderness Act ([section] 6(a)(3), 101 Stat. 1276 (1987)) comparable to WWA [section] 401(b)(3) was described as meaning that national forest lands in Michigan "not designated wilderness on enactment of this bill MUST BE MANAGED FOR MULTIPLE USE IN ACCORDANCE WITH THEIR RESPECTIVE LAND MANAGEMENT PLANS." S. Rep. No. 100-206, at 7 (1987) (emphasis added); SEE H.R. Rep. No. 100-29, Pt. 2, at 10 (1987) (areas "not designated wilderness on enactment of the bill must be managed for multiple use in accordance with land management plans under section 6" of the RPA, as amended by the NFMA). (Timber Company or Association, Eugene, OR - #15879.54000)

NEVADA WILDERNESS ACT

Congress intended that the comparable language in the Nevada Wilderness Act ([section] 5(b)(3), 103 Stat. 1786 (1989)) mean that "lands not included by Congress in a wilderness...area shall be managed for multiple-use values in accordance with forest plans." S. Rep. No. 101-113, at 8 (1989). (Timber Company or Association, Eugene, OR - #15879.54000)

NEW HAMPSHIRE WILDERNESS ACT OF 1994

The NH Wilderness Act of 1994 (Public Law 98-323) makes the USFS roadless proposal illegal. (Business/Business Association, Gorham, NH - #9063.57100)

Public Concern: The Forest Service should disclose the legislative history that allowed 21 states to pass legislation increasing wilderness.

The Forest Service has done a disservice to the public by not disclosing in this DEIS the legislative history behind the "soft release" compromise reached in 1984 which allowed 21 states to pass legislation that increased wilderness. (Individual, Tollhouse, CA - #18642.10300)

Public Concern: The Forest Service should support the proposed American Red Rock Wilderness Act.

I urge you to support the proposed American Red Rock Wilderness Act, which has been submitted to Congress and already has 160 cosponsors. (Individual, Orem, UT - #3381.64350)

3.3.5 Revised Statute 2477

In the view of many respondents, Revised Statute (RS) 2477 claims for rights-of-way are a major stumbling block to the implementation of the Roadless Area Conservation Proposed Rule. Several state that the Forest Service must acknowledge RS 2477 right-of-way claims, or state that the agency cannot decommission these routes. Some cite the Department of Interior's Omnibus Consolidated Appropriations Act, which also addresses RS 2477 claims. Others call for an analysis of existing routes to help establish which of them may be public rights-of-way

and therefore not under Forest Service jurisdiction. One states that language on page A-24 in the Draft EIS may allow the agency to attempt to supercede RS 2477 claims. In addition, some elected officials express particular concern about pending claims regarding existing RS 2477 routes that may be in roadless areas. A few ask for clarification of how RS 2477 claims will be addressed, sometimes expressing concern that these claims will be ignored.

Public Concern: The Forest Service should honor RS2477 rights-of-way.

We object to any designation of Roadless Areas that contain RS2477 trails, wagon roads, jeep roads, and other obvious historical use as mapped by GIS and Satellite. (Business/Business Association, Boise, ID - #75.53500)

The only areas I can comment on are the areas that I am familiar with, the Siskiyou National Forest. There are many RS2477 roads in this forest and the Forest Service is not authorized to decommission these roads. To do that would be illegal. (Individual, Grant Pass, OR - #2162.53500)

We find, in the Final Environmental Impact Statement for Open road and Open Motorized Trail Analysis, Appendix E--Targhee National Forest, Subject Code 6, RS2477, pages 64-72, the following USFS response to Idaho State Legislative bodies' and Counties' letter [regarding] concerns of RS2477 rights of way as recent as February 25, 1999, concerning page 64, second paragraph….The Service response to that paragraph: "Section 108 of the Department of Interior Omnibus Consolidated Appropriations Act restricts RS2477 right of way rules and regulations from becoming effective without an authorized Act of Congress." This was contrary to the intent of the U.S. Congress….The Service continues, "…we have also agreed with the counties to not decommission any asserted routes." Here, the Service acknowledges the rights of jurisdiction that the counties have. The Service then responds, "However, we maintain the right, in the interim to determine whether any route is open to motorized travel." Statements like the heretofore mentioned will have a direct impact on the "Roadless" scoping process. (Wise Use/Land Rights Organization, Rock Springs, WY - #2866.53500)

It is important that all existing routes within roadless areas that may qualify as a public right-of-way under RS 2477 even though no assertions have been made to date are identified and quantified. The EIS admits to the existence of roads on the roadless areas. There is a good possibility that many of these roads could qualify as public rights-of-way under RS 2477, it is important to identify these routes if a complete analysis of potential impacts is to be made. (Individual, Vanci, WA - #15246.53500)

On page A-24 of the Draft Environmental Impact Statement, SUMMARY and PROPOSED RULE, you will find a section called: CIVIL JUSTICE REFORM ACT. It reads "The proposed revision: (1) preempts all state and local laws and regulations that are found to be in conflict with or that would impede its full implementation." A side note is that this clause appears in all proposed revisions the USFS has made since September, 1999.
My concern is that if this language is allowed to remain, RS 2477 will be impacted. Congressional action granted RS 2477 Right-of-Ways. This language, in my opinion would give the USFS license to bypass the law through administrative action. In addition, this language would allow the Federal Land Managers to ignore Public Access claims and close access routes without adhering to NEPA and existing use, condition, user group agreements (both formal and informal), RS 2477 protections, environmental impacts, and any and all other considerations which might reasonably impact a decision on future road maintenance and use. (Individual, Oakdale, CA - #43854.90320)

The May 2000 Roadless Area Conservation Draft DEIS (Summary and Proposed Rule) ignores the Omnibus Consolidation Act of 1997 (P.L. 104-208); specifically, "General Provisions," Title I, (Department of the Interior), Section 108., as presented above. The Forest Service edict by rule that no new roads, or reconstructed roads, will be allowed within "inventoried" Roadless Areas on National Forest System lands is a defacto decision to deny the validity of any legitimate "R.S. 2477" right-of-way validation by a state or subordinate unit of state government. (State Elected Official, Albion, ID - #44351.55000)

COUNTY RIGHTS-OF-WAY

[T]he DEIS apparently does not acknowledge the County's legitimate public right-of-way established under RS 2477. Alpine County has long argued its claim to public right of way on roads constructed at the time when federal lands were open to entry and appropriation. Some of these areas are now incorrectly identified as "roadless." (County Elected Official, Markleeville, CA - #16277.53500)

A controversy has arisen in a number of states as to the scope and extent of RS 2477 claims, specifically, what it takes to prove a claim existing as of 1976. While the proposal purports to recognize claims under RS 2477, it is unclear whether states or counties will be able to develop and maintain those roads through roadless areas under this proposal. If valid existing rights are truly recognized, such roads and highways should be able to be developed and maintained. (Business/Business Association, Park Ridge, IL - #25478.53500)

RS2477 in the original 1866 "Lode Act" was an offer to the public to establish rights of way over public lands. State law governs the acceptance of that offer. In the State of California, use by the public was enough to constitute acceptance. It was not required that the County assert an RS2477 claim. Extensive gold mining and grazing occurred in Siskiyou County for more than 50 years prior to the withdrawal of the National Forests from public lands. Many RS2477 claims exist on the Forests in right that are being ignored by these proposals. The definitions of "roadless" and "unroaded" areas do not acknowledge these claims pursuant to RS 2477.
This initiative process fails to take into consideration these conflicting jurisdictional issues. The process fails to recognize the necessary primacy of the fundamental "police powers" of local government in control over the transportation infrastructure serving local communities and real public health and safety issues regarding roads and access. Decisions to seek new roads, decommission old roads, or maintain existing roads should be made at the local level by those who are most impacted by the decisions. (Business/Business Association, Yreka, CA - #43494.52000)

Quoting from the Iron County General Plan, "ACCESS AND TRANSPORTATION, currently within Iron County are many roads, trails, and paths which are used for everything from access to traditional agricultural concerns and livestock movement to timber harvesting to recreation areas. Iron County is committed to maintaining the unrestricted use of those roads, paths, and trails for these and similar activities. These roads, paths, and trails have been identified by the county under the provisions of RS 2477….Again quoting from page 29 of the Iron County General Plan, GOAL LU8.0 "Maintain and improve the valid existing rights-of-way across public and private lands in accordance with appropriate safety standards and public need."
GOAL LU8.5 "IRON COUNTY SHALL ACTIVELY DEFEND the right to maintain and control all existing paths, roads, and trails, which traverse federal and state lands, as County Rights-of-Way under provision of RS 2477. (County Elected Official, Cedar City, UT - #13526.53500)

Public Concern: The Forest Service should resolve RS 2477 claims before the proposed rule is adopted.

The Forest Service appears to be ignoring or does not understand the RS2477 road right-of-way implications. It would be well if the Forest Service would refrain from an extensive road plan until the RS 2477 issues are resolved. Our records show that some RS 2477 roads and rights-of-way have been closed previously to this Forest Initiative. Duchesne County prefers an amenable resolution on these roads that existed before Forest designation in 1905. (County Elected Official, Duchesne, UT - #13525.53500)

It is possible that this roadless Area Conservation Rule may trigger an issue of such magnitude as to bring the Forest Service to its knees if it ignores the issue of RS2477 roads claimed by counties. There are literally thousands of RS 2477 claims awaiting resolution across the West and a significant portion of them are in "roadless" areas. Perhaps this is avoided by including them under "valid existing rights" but we doubt that you are making that concession. This initiative will tend to short-circuit the collaboration necessary for local governments to negotiate with the Forest Supervisor to resolve RS2477 issues. Some of this negotiation has already been going on and Iron County in Southern Utah is a good example. Iron County has relinquished some of its RS2477 claims where it made sense to do so and retained others. (County Elected Officials, Parowan, UT - #28911.53500)

Juab County and the State of Utah are currently partner's in a Quiet Title Legal Roads Action against the Federal Government. The U.S. Forest Service is a party to this Action. This action is for RS2477 Road Rights-of-Way given to the County for which the Forest Service also claims title to the same roads. This litigation is and will continue to be expensive to taxpayers at all levels in and of itself. Juab County therefore requests that no additional roads be closed by the Forest Service until the RS2477 Quiet Title Action has been settled. If the Forest Service closes a road it may well be later proven to be a County Road and the Forest Service could be held responsible for Financial Damages of various kinds for taking road closure actions on roads it may have no legal right nor authority to close. The prudent approach would be to allow this litigation to take its course prior to implementing this Roadless Rule. Closing roads without allowing this action to take its course will surely result in additional litigation and damage settlements which will further erode Forest Service budgets unnecessarily. (County Agency, Nephi, UT - #29957.53500)

3.3.6 Alaska Concerns

Respondents express a number of legal concerns regarding management of National Forest System lands in Alaska. Both individuals and environmental organizations ask the Forest Service to reevaluate the relationship between the Tongass Timber Reform Act and the proposed rule. Some specifically request that Section 101 of this act be amended to give conservation of the forest priority over timber yield. Conversely, a wise use group maintains that the Forest Service should comply with the Tongass Timber Reform Act.

A number of respondents, including individuals, state elected officials from Alaska, and timber and wise use organizations, maintain that the proposed rule should comply with the Alaska National Interest Land Conservation Act (ANILCA), with respect to subsistence lifestyles, by guaranteeing access to inholders on all national forests and by prohibiting single use studies. Respondents also feel the Forest Service should allow access across national forests in Alaska relative to provisions in the Alaska Native Claims Settlement and Alaska National Interest Conservation Acts. In contrast, one environmental organization claims it is unnecessary to except access to private inholdings "from the prohibition on road construction and reconstruction" because ANILCA gives the agency the authority to "determine adequate access on a case-by-case basis." Furthermore, one individual suggests the Forest Service address the effectiveness of the Alaska Forest Practices Act, saying the act has not prevented the squandering of resources by native corporations.

Finally, both individuals and tribal groups maintain that the proposed rule should adhere to the principles in the Tongass Land Management Plan, and that it should comply with both the Alaska Native Claims Settlement Act and the Alaska Statehood Act.

Public Concern: The Forest Service should reevaluate the relationship between the Tongass Timber Reform Act and the proposed rule.

I am a resident of southeast Alaska and I am offended that you would exclude the Tongass from the roadless policy on the basis of political pressure from our own Congressional delegation. You have completely misunderstood the market demand provision of the Tongass Timber Reform Act. It calls on the Forest Service to protect the environment and multiple use FIRST, and to seek to meet market demand only within that framework. Congress intended to end the era of timber-first management with this Act. You are defeating its purpose by using it as a basis

to exclude the Tongass from an important policy that should apply equally to all forests. (Individual, Juneau, AK - #3106.64251)

We reject the Forest Service's suggestion that the Tongass Timber Reform Act (TTRA) requires continued logging of the Tongass roadless areas. Section 101 of the TTRA directs the agency to "seek to provide a supply of timber from the Tongass National Forest which meets the annual market demand for timber from such forest...." However, this direction is subject to other applicable law and to providing for multiple use and sustained yield of all renewable forest resources. The courts have ruled that TTRA requires no set amount of logging. According to the Ninth Circuit Court of Appeals, "TTRA envisions not an inflexible harvest level, but a balancing of the market, the law, and other uses, including preservation." Alaska Wilderness Rec. & Tourism Assn. v. Morrison, 67 F.3d 723, 732 (9th Cir. 1995) (emphasis added). (Environmental/Preservation Organization, Great Falls, MT - #43338.53900)

Because the direction to "seek" to meet market demand is subject to all other applicable laws and multiple use, the Forest Service's first obligation remains to manage "all of the various renewable surface resources of the national forests so that they are utilized in the combination that will best meet the needs of the American people." 16 U.S.C. (section) 531 (a) (Multiple-Use Sustained-Yield Act). Only after complying with this and other applicable laws should the Forest Service "seek" to meet market demand. If the combination of renewable resources that best meets the needs of the American people protects the roadless areas of the Tongass, as it clearly does, then the Tongass must be included in the roadless rule without regard to the market demand provision of the TTRA. (Environmental/Preservation Organization, Washington, DC - #43731.53900)

…the legal arguments alluded to in the DEIS as possible rationale for not affording roadless areas on the Tongass immediate protection from road building and logging simply have no merit. I believe that examination of your agency's own court arguments provide the appropriate interpretation of Section 101 of the Tongass Timber Reform Act. The Forest Service response memorandum of February 18 in Southeast Alaska Conservation Council v. Lyons demonstrates the misguided interpretation contained in the DEIS. In that case you argue that "[r]eliance on TTRA is misplaced because the TTRA directive is subject to numerous qualifications and because the Ninth Circuit has rejected the interpretation that the TTRA directive to seek to meet market demand is 'mandatory.'" A more accurate interpretation of the statute than is currently reflected in the DEIS. (Individual, Alexandria, VA - #43954.53900)

The Forest Service itself has advocated this more lenient and more accurate interpretation of the TTRA. In AFA v. U.S. the Forest Service argued "The use of the word "seek" necessarily implies a congressional recognition that the Forest Service may be in full compliance with Section 101's mandates, even though less than "market demand" is offered. (Defendants' Memorandum in Opposition to Plaintiff's Motion for Summary Judgment and in Support of Defendants' Cross Motion for Summary Judgment 4/14/95, p.10.)
In a case from this year, the Forest Service argued: "Reliance on the TTRA is misplaced because the TTRA directive is subject to numerous qualifications and because the Ninth Circuit has rejected the interpretation that the TTRA directive to seek to meet market demand is "mandatory". (Southeast Alaska Conservation Council v. Lyons. Defendants' Opposition to Plaintiffs' Brief on the Merits, 2/18/00.). (Environmental/Preservation Organization, No Address - #52238.53900)

AMEND SECTION 101

Amend section 101 of the Tongass Timber Reform Act to give conservation of the forest priority over timber yield. (Preservation/Conservation Organization, Chico, CA - #15065.72000)

Public Concern: The Forest Service should comply with the Tongass Timber Reform Act.

If the roadless proposal is applied to the Tongass, how will you meet the 'seek to meet market demand' requirements of the Tongass Timber Reform Act? (State Elected Official, Juneau, AK - #16030.53900)

THE FOREST SERVICE'S PROPOSAL AND DEIS AS PRESENTLY WRITTEN ALSO DIRECTLY VIOLATE ANILCA, MUSYA, TTRA, AND NEPA. BEFORE TAKING ANY ACTION ON THE PROPOSAL, OTHER

THAN WITHDRAWING IT, THE FOREST SERVICE MUST CONDUCT A FORMAL LEGAL REVIEW OF THE PROPOSED PROHIBITION ON THE TONGASS AND CHUGACH NATIONAL FORESTS WITH RESPECT TO ANILCA, MUSYA, TTRA, AND NEPA. (Wise Use or Land Rights Organization, Anchorage, AK - #43414.50000)

Public Concern: The proposed rule should comply with the Alaska National Interest Land Conservation Act.

ANILCA: The Alaska National Interest Conservation Act (ANILCA) of 1980 placed into law an agreement between Congress and the Carter White House that any further conservation unit decision in Alaska would fall under the sole purview of Congress. Hence, the meaning of several "no more" provisions of the Act. Any application to national forest in Alaska of the new roadless policy would violate the ANILCA agreement, creating DE FACTO wilderness without any congressional action. (State Elected Official, Anchorage, AK - #17254.53900)

Application of President Clinton's proposed roadless policy to the Tongass and Chugach National Forests would designate significant additional acreage as administrative, de facto wilderness areas within Alaska. (State Elected Official, Juneau, AK - #16030.53900)

The Forest Service has chosen to ignore the fact that explicit language in the Alaska National Interest Lands Conservation Act of 1980 prohibits in Alaska the very kind of study represented by this EIS. Collectively referred to as No More Clauses of ANILCA, several sections set forth Congress' position that the appropriate balance was established by ANILCA between preservation and protection in Alaska's forest. Therefore, Congress prohibited the administration from performing another RARE analysis in Alaska or any study that would be similar in scope and purpose. Congress reserved…to itself alone the decision to increase the conservation of public lands in Alaska. If the Clinton Administration insists on including the Chugach and the Tongass in the Roadless Initiative, it will do so in defiance of federal law. (Timber Company or Association, Ketchikan, AK - #23887.53900)

ANILCA Section 101(d) specifically prohibits designation of new conservation system units, new national conservation areas, or new national recreation areas on federal lands in Alaska.
ANILCA Section 708(b)(4) specifically prohibits the Department of Agriculture from conducting any statewide roadless area review or study for the purpose of determining their suitability for inclusion in the National Wilderness Preservation system in Alaska.
ANILCA Section 1326(a) specifically prohibits administrative closures of more than 5,000 acres in Alaska unless approved by Congress, which approval has not been granted.
ANILCA Section 1326(b) specifically prohibits study of federal lands in Alaska for the single purpose of consideration for CSU's or other similar designations unless specifically authorized to do so by Congress, which authrization has not been given. (Wise Use or Land Rights Organization, Anchorage, AK - #43414.53900)

WITH REGARD TO SUBSISTENCE LIFESTYLES

Is it in the spirit of ANILCA to ignore the requirements of the subsistence lifestyle in Alaska? The USFS just had an unfavorable ruling in the claims court on the claim brought by Alaska Pulp Corporation for $1.2 billion dollars. This would not have happened if the Service had properly considered the legal ramifications of terminating the 50 year contract with APC before doing so. Now we taxpayers are stuck with the bill. The same thing is going to happen here in Alaska if the Service simply gets a "yes man" legal opinion without adequately considering legal impacts. (Individual, Ketchikan, AK - #199.53900)

This document is not in compliance with Federal Law. The DEIS-FS-Roadless Area Conservation-does not contain a Title VIII-ANILCA subsistence evaluation. The Title VIII subsistence evaluation requires Federal land managers to evaluate the impacts of federal proposed actions on subsistence uses and users within the region.
Pages - i to ii do not list a subsistence evaluation in the Table of Contents.
The Title VIII subsistence requirement applies to all Federal Public lands in Alaska--Please revise this document by including a Title VIII Subsistence Evaluation. (Individual, Eagle River, AK - #17701.90400)

BY GUARANTEEING ACCESS TO INHOLDERS ON ALL NATIONAL FORESTS

Alaska National Interest lands Conservation Act (ANILCA) (16 U.S.C. #3101-3233) "Not withstanding any other provision of law, and subject to such terms and conditions as the Secretary of Agriculture may prescribe, the Secretary shall provide such access to non-federally owned land within the boundaries of the National Forest System as the Secretary deems adequate to secure to the owner the reasonable use and enjoyment thereof: Provided, That such owner comply with rules and regulations applicable to ingress and egress to or from the National Forest system." 16 U.S.C. #3210 (a). ANILCA provides a statutory right of access to inholders of property within all National Forests lands and not exclusively to those in Alaska. See Montana Wilderness Ass'n v United States, 655 F.2d 951, 957 (9th Cir. 1981) cert. denied, 455 US 989 (1982). (County Agency, Duluth, MN - #17287.53100)

In addition to this authority (applicable by its logic to road access to state trust inholdings in National Forests), the Trust lands Administration is entitled to road access to inheld trust lands by virtue of the Alaska National Interest Lands Act, 16 U.S. C. sec. 3210 (a), and may also be entitled to road access in specific situations by the common law doctrine of easements by necessity and by federal Revised Statute 2477. (State Elected Official, Salt Lake City, UT - #43918.55000)

BY PROHIBITING SINGLE USE STUDIES

ANILCA prohibits any single use study such as you are proposing on any federal lands in Alaska (Chugach and Tongass NF). Your proposal violates ANILCA by conducting a single use proposal (no roads). (Individual, Great Falls, MT - #28425.53900)

Public Concern: The Forest Service should allow access across national forests in Alaska relative to provisions in the Alaska Native Claims Settlement and Alaska National Interest Conservation Acts.

Chugach Alaska Corporation CAC's valid existing rights of access to its lands preclude the proposal's application to Chugach National Forest lands across which CAC's rights extend. Under the provisions of ANCSA, ANILCA, the 1982 CNI Settlement Agreement, and the common law, CAC has expressed and implied rights of access across federal lands administered by the Chugach National Forest that cannot be frustrated or diminished by the proposal. As currently addressed in the DEIS (30140), access "...need not be the most direct, economical, or convenient route for the landowner." And further "adequate access may not be road access in all cases…." The DEIS must be modified to clarify this position with respect to CAC and the final rule, if passed must include language specific to ANCSA and ANILCA rights of access, which go well beyond the general definition of "valid and existing rights." ….The DEIS must explicitly acknowledge and preserve CAC's valid existing rights in all possible alternatives considered in the DEIS, leaving no room for interpretations that will frustrate CAC's exercise of those vested rights across national forest lands and the fulfillment of the intent and purpose of ANCSA, ANILCA, and the 1982 CNI Settlement Agreement. (Wise Use or Land Rights Organization, Anchorage, AK - #43414.90300)

Public Concern: The Forest Service should exercise its statutory authority under Alaska National Interest Land Conservation Act to determine adequate access on a case-by-case basis.

8. ACCESS TO PRIVATE INHOLDING UNDER ANILCA SHOULD NOT BE GENERALLY EXCEPTED FROM THE PHOHIBITION ON ROAD CONSTRUCTION AND RECONSTRUCTION.
As with the Mining Law, the Forest Service overstates the authority of the Alaska National Interest Land Conservation Act (hereafter ANILCA). At #294.12(b) (3)….the proposed rule gives a blanket authorization, if a valid right exists, to construct and reconstruction roads in inventoried roadless areas despite the fact that the statute itself gives the agency the authority to restrict access to non-motorized methods, to deny access across federal lands altogether , to determine adequate access on a case by case basis and to regulate access through rulemaking….The proposed rule gives a blanket authority to construct and reconstruct roads in inventoried roadless areas where none

exists under the statute. As with the Mining Law and the Organic Act, the Forest Service has again ignored the authority Congress has granted it to write rules specific to access to private inholdings in inventoried roadless areas and to require non-motorized access on a site specific basis.
…Federal Register, Vol. 63, No 91, Wednesday, May 10, 2000, p.30288.
…See generally Federal Register, Vol. 56, No . 115, Friday, June 14, 1991, pp 27410-27418.
(Environmental/Preservation Organization, Cave Junction, OR - #16188.53900)

While from the discussion of the proposed rules in the Federal Register Notice (FRN) the Forest Service appears to be excepting access to private inholdings from the general prohibition on road construction and reconstruction….the DEIS acknowledges that "adequate access may not be road access," and that "reasonable access is currently determined on a case by case basis" (3-140). The proposed rule as now written actually weakens protection of inventoried roadless areas by generally exempting access to private inholdings from the general prohibition on road construction and reconstructions.
Section 3210 (a) of ANILCA states that: "Notwithstanding any other provision of law, and subject to such terms and conditions as the Secretary of Agriculture may prescribe, the Secretary shall provide such access to nonfederally owned land within the boundaries of the National Forest System as the Secretary deems adequate to secure to the owner the reasonable use and enjoyment thereof: Provided, that such owner comply with rules and regulations applicable to ingress and egress to or from the National Forest System (emphasis added). 16 USC # 3210 (a).
Sec. 3210 (a) of ANICLA clearly provides for the Secretary of Agriculture to prescribe rules and regulations for ingress and egress to private inholdings surrounded by national forest inventoried roadless areas and unroaded areas but it does not provide inholders with a blanket right to construct or reconstruct roads for that access. Further Sec. 3210 (a) does not specify that the Forest Service must provide access to private inholding by road or by motorized vehicles. While it may be questionable that any such roadless and unroaded area regulations as the secretary might provide would affect those rights-of-way that were legally established under provisions of earlier authorities, any new regulation from this rulemaking would be applicable to new or upgraded access routes to inholdings.
(Environmental/Preservation Organization, Cave Junction, OR - #16188.53900)

Public Concern: The Forest Service should address the effectiveness of the Alaska Forest Practices Act.

Under the ANCSA, 550,000 acres of the highest value timberlands remaining uncut after 20 years of high-grading by the two pulp companies was granted to S.E. Alaska Native Corporations from the Tongass N.F. Now 90% of these land grants have been clear-cut wastefully with other resources squandered by Native corporations under the toothless and ineffective Alaska Forest Practices Act. (Individual, Sitka, AK - #883.53900)

Public Concern: The proposed rule should adhere to the principles in the Tongass Land Management Plan.

No regulatory or statutory process exists for the Forest Service to unilaterally change the revised TLMP during the appeal process or otherwise. Any determinations that the Forest Service attempts to make during the TLMP appeal process must be limited to correcting what the Forest Service agrees were legal errors in the TLMP planning process. Any other changes (including changes to the Tongass roadless area policy) must be pursued as a plan amendment through the appropriate forest planning regulations. (Tribal, Juneau, AK - #44005.53900)

Public Concern: The proposed rule should comply with the Alaska Native Claims Settlement Act.

The Roadless Initiative must not supersede or abrogate the rights of Alaska Natives to achieve their entitlements granted under the 1971 Alaska Native Claims Settlement Act (ANCSA). The final rules must include unimpeded exercise of land selection rights and authority to use Native land and land selection entitlements to exchange for other public land that may include roadless areas. (Tribal, Juneau, AK - #44005.53900)

Public Concern: The proposed rule should comply with the Alaska Statehood Act.

This policy violates the RS 2477 and the Alaska Statehood Act. (Individual, Ketchikan, AK - #7014.53500)

3.3.7 Other Acts

In addition to the federal land management acts and laws discussed in previous sections, respondents reference a number of miscellaneous acts with which, they assert, the Forest Service is legally bound to comply. Several respondents maintain that the Forest Service should keep the promise made in the 1924 Clark-McNary Act, which "laid the groundwork for the National Forests with a clear goal of providing bountiful and sustainable timber harvests for years to come." A number of writers also insist the proposed rule should comply with the intent of the Roads and Trails Act and Renewable Resources Planning Act, noting therewith the Forest Service's obligation to maintain an adequate system of roads and trails to meet demands for timber, recreation, and other public uses.

Respondents also argue that the Forest Service should comply with special Use regulations in 36 CFR 251, under which, they maintain, the Forest Service must evaluate applications for new rights-of-way. In addition, one respondent insists that the Forest Service should comply with the purpose of the National Recovery Relief Act. According to this person, "the National Grasslands in McKensie County were purchased as agricultural projects under the authority of [this act]. This history and court orders make a roadless plan for the National Grasslands both illogical and illegal since roadless areas were not a purpose of the repurchase program."

Other respondents state that the proposed rule should provide "community stability" as required by Timber Management Planning; that it should comply with the intent of the Weeks Act by obtaining the consent of the affected counties before implementing the proposed rule; and that the Forest Service should revise funding by repealing the Knutson-Vandenburg Act of 1930.

Public Concern: The Forest Service should keep the promise made in the 1924 Clark-McNary Act.

The current Roadless Initiative continues to erode local control and breaks the promise of the 1924 Clark-McNary Act that laid the groundwork for the National Forests with a clear goal of providing bountiful and sustainable timber harvests for years to come. The original Chequamegon and Nicolet National Forests, when formed in 1928, included lands that had been nearly clear-cut and mismanaged and were considered useless and tax delinquent. Through locally controlled forest management, what was once 500,000 acres of useless land is now over 1.5 million acres of productive forest land. (Individual, Kennan, WI - #18452.41240)

The WCA membership also contends that this initiative violates the intent of the Clark-McNary Act of 1924. The Clark-McNary Act created the National Forests in their current form with the priority of creating a sustainable source of timber. (Town or Municipality Elected Official.19964.53000)

Citing specifically the Clark-McNary Act of 1924, which authorized the purchase of National Forests when such lands would promote a future timber supply, the Wisconsin Legislature enacted legislation empowering the federal government to acquire land for the establishment of a National Forest.

It is precisely along these lines that the local communities agreed to sell land to the federal government. The purpose of the federal government in buying these lands was to restore them to a condition of maximum forest productivity by intensive management, planting, fire protection and to make them sources of permanent timber supply and bases for permanent wood-using industries and communities. (Federal Elected Official, Green Bay, WI - #18648.50000)

[D]on't forget the comment made by L.F. Kneipp, Ass't Chief Forester, at the Wisconsin Commercial Forestry Conference held at Milwaukee on March 28-29, 1928. These same comments were made to the county boards that were involved in the land sales to the Federal Government to create Wisconsin's National Forests. Kneipp stated, "The purpose of the United States in buying these lands is to restore them to a condition of maximum forest productivity by intense management, fire protection, planting, etc.; to make them sources of permanent timber supply and bases for permanent wood using industries and communities."
The aforementioned conservation leaders have given you the direction that must be followed in your Ten-Year Management Plan to satisfy the commitment made to the State of Wisconsin when the Federal Government purchased land to establish the present National Forests under the 1924 Enabling legislation. (Individual, Wabeno, WI - #19358.53000)

Public Concern: The Proposed Rule should comply with the intent of the Roads and Trails Act and the Renewal Resources Planning Act.

We urge that these proposals be withdrawn. They are contrary to congressional intent as set forth in the Roads and Trails Act and the RPA. Transportation and recreation planning should be integrated in the land management planning process as clearly contemplated by Congress. (Individual, Klamath Falls, OR - #13672.53000)

THE ROADS AND TRAILS ACTS FURTHER EMPHASIZE THE USE OF NATIONAL FOREST RESOURCES. Congress has found "that the construction and maintenance of an adequate system of roads and trails within...the national forests...is essential if increasing demands for timber, recreation, and other uses of such lands are to be met." 16 U.S.C. 532. Contrary to this legislative policy, the Forest Service's roadless area initiatives would largely freeze the road network as it exists today. By preventing the future construction of roads on 28% of the National Forest System, the rulemaking will make it impossible to meet future "increasing demands for timber" and roaded "recreation" in new areas. (Timber Company or Association, Eugene, OR - #15879.53700)

It [proposed rule] ignores the United States Code, section 532 "Roads" in Title 16, chapter 2: "The Congress hereby finds and declares that the construction and maintenance of an adequate system of roads and trails within and near the National Forests...is essential if increasing demands for timber, recreation, and other uses of public land are to be met...and that such a system is essential to enable the Secretary of Agriculture to provide for intensive use, protection, development, and management of these lands under the principles of multiple-use and sustained yield of products and services." (Individual, Lander, WY - #13608.50000)

The National Forest Roads and Trails Act (NFRTA) (16 U.S. C. #532-538) clearly evidences Congress' intent in providing for roads to satisfy the nation's demand for timber. The statute also recognizes the need for protection, however, this is in the context of providing for the best way to harvest timber. Congress gives the Secretary the power to create roads through this statute, however, it does not give him or the Forest Service the power to prohibit roads. (County Agency, Duluth, MN - #17287.53100)

Public Concern: The proposed rule should comply with Special Use regulations in 36 Code of Federal Regulations (CFR) 251.

Newly proposed or reissued rights-of-way or special use permits must be evaluated consistent with 36 C.F.R. Part 251, Subpart B Special Use regulations. The inflexible nature of the proposed roadless policy conflicts with the criteria under which the Forest Service must evaluate applications for new rights-of-way. (Utility Group or Organization, No Address - #43981.90330)

Public Concern: The Forest Service should comply with the purpose of the National Recovery Relief Act.

U.S. owned historical documents, agencies' records and Federal District Court proceedings show that the National Grasslands in McKensie County were purchased as Agricultural projects under the authority of the 1933 National Recovery Relief Act.
This history and court orders make a roadless plan for the National Grasslands both illogical and illegal since roadless areas were not a purpose of the repurchase program. (Grazing Organization, Watford City, ND - #43989.10200)

Public Concern: The proposed rule should provide "community stability" as required by Timber Management Planning.

Forest service Regulations, 36 CFR sec 221.3(a)(3): The F.S. is obligated to consider and provide for "community stability' in this decision-making process. See also S. Rept. No. 105.22;30 Cong. Rec. 984 (1897); The Use Book at 17. "Community stability" is defined as a combination of local custom, culture and economic preservation as described by the Forest Service. (Business/Business Association, No Address - #54308.50000)

Public Concern: The proposed rule should comply with the intent of the Weeks Act.

The DEIS (3-13) notes that the Weeks Act of 1911 allowed the Forest Service to purchase lands in the Eastern United States, however we note that lands were also purchased in Oregon under the same authority. The Weeks Act is particularly relevant to this decision in that lands that were acquired under the Weeks Act were acquired only with the consent of the affected counties, which consent was given with the understanding these lands would be used for commodity production and in turn a 25% return to the counties. Prior to placing any of the Weeks Act lands into roadless or unroaded categories under this action the Forest Service should obtain the consent of the counties. (County Agency, John Day, OR - #16087.53000)

Public Concern: The Forest Service should revise funding by repealing the Knutson-Vandenburg Act of 1930.

Another disincentive was created by the Knutson-Vandenberg Act of 1930, which allowed the Forest Service to keep an unlimited share of timber receipts for reforestation and other sale area improvements. This encouraged managers to think of returns to the Treasury as "losses" because they lose control over them. As a result, they tended to choose cutting methods that required the most costly reforestation techniques and to find other ways to keep most timber receipts for themselves rather than compensating the Treasury for funds spent to arrange the timber sales.
The administration has proposed that Congress repeal this law. In its place, the administration wants Congress to provide a large fund that could be used for a wide range of activities. But Congress has historically directed that such appropriated funds be used for roads, timber sales, and other activities. Such a fund is not likely to result in significantly better incentives. (University/Professional Society, Arlington, VA - #43983.93644)

3.3.8 Establish Review Panels

Many respondents believe the government should establish review panels to settle disputes between land management and regulatory agencies. These respondents recommend each panel should consist of three people and be established in each region. One respondent notes that "their decisions provide case law that would evolve a better vision and consistency in application between management and regulatory agencies." Other citizens suggest the Forest Service develop a modified Public Land Law Review Commission. According to one federally elected official, "the commission should be composed of real experts of proven competence" ultimately resulting in "draft legislation, perhaps in several forms."

Public Concern: The U.S. Government should establish review panels to settle disputes between land management and regulatory agencies.

I believe that three-person review panels should be established in each region to settle disagreements over legitimate disputes between land management and regulatory agencies. These panels, by their decisions, provide "case law" that would evolve a better vision and more consistency in application of the evolving partnership between management and regulatory agencies. (Timber Association, Medford, OR - #13658.41400)

Public Concern: The Forest Service should develop a modified Public Land Law Review Commission.

Maybe it is time, once again, for the Public Land Law Review Commission--but perhaps with a twist. Perhaps, for once, such a commission might be composed of real experts of proven competence with no particular ax to grind. The key to success would be to pick the right leader and allow that leader to put together the team (with approval reserved to elected officials) suited to the task and develop the required budget. The task should be clearly described in consultation with the team leader. There should be a time certain for completion of the task. Following appropriate analysis, including public hearings, the ultimate out come would be draft legislation, perhaps in several forms. (Federal Elected Official, Medford, OR - #13568.51000)

3.4 Mining Acts

This section deals with public concerns that address the various mining acts. Respondents' concerns are divided into the following subsections: Subsection 3.4.1 1872 Mining Law; Subsection 3.4.2 Other Mining and Mineral Leasing Laws; Subsection 3.4.3 Mining Access; Subsection 3.4.4 Consistency Between the Proposed Rule and Existing Laws.

3.4.1 1872 Mining Law

A number of respondents voice their concerns about the effect the proposed rule would have on access to mineral exploration and development, and cite the protections for such exploration and development under the General Mining Act of 1872. Although some merely request clarification of the effects, many fear that the proposed rule would circumvent guarantees of access except by foot or horse. Some state that the Forest Service has no authority to deny access, and that any

attempt to do so would be in direct conflict with the General Mining Act. One respondent states that a variety of uses should be guaranteed under the General Mining Act, including OHV use and logging. In contrast, some also ask that the General Mining Act be revised or repealed.

Public Concern: The Forest Service should comply with the General Mining Law of 1872.

Under the General Mining Law of 1872, under Locatable Minerals: Valid existing rights to minerals would be exempted from Road Construction and Reconstruction Prohibitions under all of the prohibition alternatives. Thus construction and reconstruction of roads considered reasonable and necessary for locatable mineral exploration and development would be allowed as a right of access guaranteed by the General Mining Law of 1872. I assume a valid existing right simply means the rights of the General Mining Law of 1872. Or does the proposed plan attempt to supercede the mining law of 1872, by requiring existing claims or plans of operation, as existing rights? Therefore curtailing the right to prospect or explore the roadless areas, as will be implemented with leasable minerals by the expiration of lease and no further means of exploration. Unfortunately there's not too many prospectors using horse or ass to reach the minerals nowadays. The Forest Service must realize that the proposed alternatives excluding the no action will ultimately end natural resource harvest and development: particularly minerals and timber. By prohibition, or by economics, both resources will become unattainable on the 28% of N.F.S. land considered. Is this in violation of the General Mining Law of 1872? (Individual, Carson City, NV - #7463.53600)

The Forest Service has no authority to prevent access for mining exploration and development activities conducted under the Mining Law of 1872. The proposed rule and policy would significantly limit access to National Forest land for mineral exploration and development. This is directly contrary to the central provision of the Mining Law which declares that "all valuable mineral deposits in lands belonging to the United States…are…free and open to exploration and purchase, and the land in which [they] are found to occupation and purchase" by citizens of the United States. Congress has specified the procedures that must be followed by a land management agency that seeks to close or withdraw lands from entry and location under the general mining laws. The Forest Service proposal, to declare virtually all of its lands unavailable for mining by prohibiting the construction of necessary access roads, does not comply with those congressional procedures. (Mining/Oil Organization, Salt Lake City, UT - #6766.53600)

The roadless plan will effectively prevent a valid miner from actually mining those claims through the elimination of that right of entry for equipment etc., will make the patenting more difficult, if not impossible, and in affect is in direct conflict with both the mining law of 1872 and the intent of that law. (Individual, Maricopa, CA - #18909.53600)

Page 3-143 states, "THESE ALTERNATIVES COULD AFFECT A MORE LIBERAL USE OF SUDS AS A MANAGEMENT OPTION FOR LOCATABLE MINERAL ACTIVITIES IN INVENTORIED ROADLESS AREAS TO ASSURE THE HIGHEST DEGREE OF PROTECTION FOR ROADLESS CHARACTERISTICS." Again, this statement implies a degree of regulatory abuse and attempts to circumvent the Mining Law. (County Elected Official, Fallon, NV - #17290.53600)

I want the plan to declare these roadless areas open, under the 1872 mining law to all mining, off road vehicle use, oil and gas development as well as road building [and] logging. (Individual, Huntsville, AR - #18618.53600)

BY NOT ALLOWING RECREATIONAL PLACER MINING IN ROADLESS AREAS

The 1872 Mining Law does not include recreational placer mining so it should not be allowed in roadless areas, due to the negative impact on sensitive species, ground water, and wildlife habitat. (Individual, No Address - #10487.53600)

Public Concern: The Forest Service should repeal the 1872 Mining Act.

It's also time to end that old 1800 mining act that allows anyone to claim a "mine" on OUR land and mess it up at will, CHEAPLY. (Individual, No Address - #13332.93510)

Public Concern: The Forest Service should revise the 1872 Mining Act.

Mining is also compromising our beautiful lands. Use the updated 2000 mining moratorium of Wisconsin not 1872 law. (Individual, No Address - #6170.93500)

3.4.2 Other Mining and Mineral Leasing Laws

In addition to concerns over compliance with the General Mining Law of 1872, respondents cite concerns with respect to other mining acts and laws. According to one mining association, the Forest Service must comply with the National Materials Research and Development Act of 1980, an act designed to assure the availability of minerals for national security and to "promote and encourage private enterprise" in the development of sound domestic materials industries. Respondents argue further that the proposed rule conflicts with the Mining and Minerals Policy Act of 1970, the Leasing Reform Act, and the Federal Coal Management Program. One environmental group suggests that the Smith River National Recreation Area regulations should serve as a model of mining regulations, and another states that mining regulations should be revised and subject to review under NEPA. Finally, one mining organization maintains that the Forest Service must comply with its own Manual (FSM 2760 et. seq 6/1/90), which requires mineral exploration and extraction when that is the best use of the site.

Public Concern: The Proposed Rule should comply with the National Materials Research and Development Act of 1980.

The proposed RAC plan conflicts with the National Materials Research and Development Act of 1980 (P.L. 479) 94 Stat 2305-2310; this needs to be resolved. (Individual, Las Vegas, NV - #13910.51000)

The United States Congress has found in the National Materials and Minerals Policy, Research and Development Act of 1980 that "the availability of materials…is essential for national security, economic well-being, and industrial production." 30 U.S.C. [section] 1601(a)(1). Congress also declared it to be the policy of the United States that the President, through responsible departments and agencies shall "promote and encourage private enterprise in the development of economically sound and stable domestic materials industries." 30 U.S.C. [section] 1602(6). Congress directed "that the responsible departments and agencies identify, assist, and make recommendations for carrying out appropriate policies and programs to ensure adequate, stable, and economical material supplies essential to national security, economic well-being, and industrial production." 30 U.S.C [section] 1603(1). …The term "materials" is defined as "substances, including minerals, of current or potential use that will be needed to supply the industrial, military and essential civilian needs of the United States." 30 U.S.C. [section] 1601(b).

Contrary to these policies, the Forest Service is considering prohibiting road construction in the inventoried roadless areas within the National Forest System. Obviously, the impact on the availability of minerals could be monumental unless clear exceptions are given for both locatable and leasable minerals. Modern American society depends critically on materials mined from the earth. Our nation depends on these minerals, but further development of these domestic resources is significantly hampered by restricted access to mineral deposits on federal lands. The federal government manages 632 million acres of public land in the United States, representing as much as 60 percent of the nation's hard rock mineral estate; however, less than half of that is open to mineral exploration and production. We can ill-afford any further reduction in the mineral estate. (Mining Association, Spokane, WA - #16091.93500)

Public Concern: The Proposed Rule should comply with the Mining and Minerals Policy Act of 1970.

The proposed RAC [Roadless Areas Conservation] plan conflicts with the Mining and Minerals Policy Act of 1970 (P.L. 91-631), 84 Stat 1876; this needs to be resolved. (Individual, Las Vegas, NV - #13910.51000)

Public Concern: The proposed rule should comply with the Leasing Reform Act.

The Forest Service's regulations implementing the Leasing Reform Act establish a detailed process for identifying those national forest lands which may be made available for oil and gas leasing. 36CFR #228.102 (c). The forests have spent considerable time and money preparing these analyses, yet that work would essentially be disregarded if the proposed rule were adopted. (Individual, Denver, CO - #29016.50000)

There appears to be no mention of leases (oil and gas, coal, etc.). 36 CFR 228.100 deals with oil and gas leasing. These Regulations were developed in response to the 1987 Leasing Reform Act. The Regulations say how and why we analyze leasing decisions. There is a statutory requirement to lease those lands that are found to be available through this analysis process. (Individual, Rifle, CO - #50095.53000)

In the context of oil and gas leasing and operations, the proposed rule ignores not only the decisions made in individual and resource management plans but also the leasing analyses prepared by the Forest Service in compliance with the Federal Onshore Oil and Gas Leasing Reform Act of 1987 and its implementing regulations (in particular, 36CFR. #228.102). The Leasing Reform Act prohibits oil and gas leasing on lands recommended for wilderness allocation by the surface managing agency and on lands allocated to wilderness or further planning during the RARE II process, unless those lands have been allocated to uses other than wilderness by a subsequent land and resource management plan. 30 U.S.C. #226-3(a). Congress could have, but did not, prohibit oil and gas leasing in all unroaded areas. Rather it specifically relied on the decisions made by the Forest Service and its land and resource management plans. Since roads are necessary to develop oil and gas leases, the proposed rule essentially precludes leasing in unroaded areas, even though Congress has already specifically addressed those roadless areas which shall not be available for lease. (Individual, Denver, CO - #29016.55000)

Public Concern: The Forest Service should comply with the Federal Coal Management Program regulations by completing an unsuitability analysis before withdrawing land from coal leasing activities.

In 1979, the Department of Interior formally implemented by regulation the Federal Coal Management Program (Program). The new Program was deemed necessary due to litigation over the existing program as well as three newly enacted statutes, FLPMA, the Federal Coal Leasing Amendments Act of 1976 (FCLAA) and the Surface Mining Control and Reclamation Act of 1977 (SMCRA). SEE Final Environmental Impact Statement for Federal Coal Management Program at pp. 1-15-1-17. FLPMA contains more general land use planning requirements while FCLAA contains more specific land use planning sections related to coal. SMCRA requires the Secretary of the Interior to review federal lands to determine whether they contain areas unsuitable for all or certain types of certain coal mining.

The Bureau of Land Management (BLM) is the lead agency for the Federal Coal Management Program. The first major part of the Program is mandatory comprehensive land use planning, prepared and continually updated by BLM or other surface management agency pursuant to FLPMA and FCLAA. The primary purpose of this land use planning is to identify those specific tracts for further leasing consideration. To respond to litigation and the unsuitability provisions of SMCRA, the Program regulations establish screening criteria for making such a determination including 20 unsuitability provisions. BLM initially screens unleased federal coal lands for unsuitability in a land use land prepared pursuant to FLPMA and the land use planning sections of FCLAA. Under FCLAA, the Forest Service prepares appropriate land use plans for areas under the department of Agriculture's jurisdiction. 30 U.S.C. [section] 201(a)(3)(A)(i). Specifically, the Program regulations state that BLM or "the other surface managing agency conducting the land use planning SHALL, USING THE UNSUITABILITY CRITERIA and procedures set out in 3461 of this title, review federal lands to assess where there are areas unsuitable for all or certain stipulated methods of mining." 30 CFR [section] 3420.1-4(e)(2).
The USFS has no authority to ignore the Federal Coal Management Program regulations, or their statutory basis, by declaring vast amounts of public land off-limits to future coal leasing activities. To do so, would be to violate the legal requirement to use the unsuitability requirements to determine areas available for leasing or at a minimum is an attempt to insert a new suitability requirement into the mix without any analysis of its impact on the Program. The proposed rule and DEIS contain no analysis of the interaction of the proposed rule and the Program. (Mining Association, Spokane, WA - #16091.93510)

Public Concern: The Forest Service should use Smith River National Recreation Area regulations on mining as a model for roadless areas conservation.

The SRNRA regulations governing mining are more reflective of the Forest Service, the Courts and the Department of Interior's current implementation of the Mining Law and Organic Act than the more archaic 36 CFR 228 regulations and could be used [as] a model for roadless area conservation. (Environmental/Preservation Organization, Cave Junction, OR - #16188.53000)

Public Concern: The Forest Service mining regulations should be revised and subject to public review under the National Environmental Policy Act.

The direction in the DEIS and the proposed rule appears to absolve the Forest Service from all responsibility to regulate mining in roadless areas. First, the DEIS holds up the agency's general mining regulations at 36 CFR 228 as adequate to protect roadless areas stating that these assure "that exploration and development of locatable mineral are conducted in a manner that minimizes adverse environmental impacts to NFS surface resources (3-142). However, the 36 CFR 228 regulations are out of date and do not directly address the need to conserve roadless areas. The regulations were essentially promulgated in 1974 and do not reflect current scientific knowledge about the harmful effects of mining, road construction and reconstruction, the threat [to] non-native species and the values of roadless areas. Further the 36 CFR 228 regulations have never undergone public review under the National Environmental Policy Act (NEPA). (Environmental/Preservation Organization, Grants Pass, OR - #29018.53000)

Public Concern: The proposed rule should comply with the Forest Service Manual for mineral withdrawal.

Not only is the roadless proposal beyond statutory authority as a de facto withdrawal without the procedure required by law, it even violates the Forest Service's own Manual rules. For example, the Forest Service must comply with the withdrawal analysis outlined in its Forest Service Manual ("FSM") chapter on withdrawals. See FSM [section] 2760 et seq. (dated June 1, 1990). In evaluating the need for a withdrawal initiated by the Forest Service, the manual requires the encouragement of "mineral activity where mineral extraction is the best use of the site," Id. [section] 2761.02(4), and requires Forest Service officers to document new withdrawal of lands from alienation or entry under the mining laws by an assessment of mineral potential, an evaluation of alternatives and an analysis showing that the use or special features of the area cannot be adequately preserved or protected through other means.

Neither the encouragement of valuable mineral activity nor the procedural requirements have been honored in this roadless proposal. The Forest Service should conduct this type of detailed analysis prior to proceeding with this rulemaking process.
In another pertinent section, the Forest Service Manual notes that withdrawal from mineral leasing should be made rarely since existing public laws, federal regulations, and leasing stipulations provide substantial opportunities to accommodate both surface resources and recovery of leasable minerals. Id. Based on the foregoing, the Forest Service cannot proceed with the proposal until the specific requirements of FLPMA have been satisfied and public comment under that procedure supports the roadless proposal. Again, the Forest Service fails to heed the guidance of its own Manual. (Mining/Oil Company or Organization, Washington, DC - #52224.53000)

3.4.3 Mining Access

In spite of all the mining acts and laws that encourage mining exploration and development, the Forest Service does have the authority, some state, to restrict the mode of access to mining claims, and can deny motorized access altogether. Others point out that roadless areas can be protected by a determination of whether valid existing rights exist, and by requiring a claimant to demonstrate the existence of a statutory right. Several respondents also state that the Forest Service should ensure that mining claims under the General Mining Law also comply with other federal laws and recent court rulings requiring discovery of valuable mineral deposits before claiming a valid mining right. Others make the point that the General Mining Law does guarantee access, and that subsequent legal findings support the contention that access specifically includes road access for motorized vehicles for both exploration and development.

Public Concern: The Forest Service should exercise its statutory authority to restrict the mode of access to mining claims.

Notwithstanding the issue of whether the claimant has a valid right to mine there is no legally justifiable reason to exempt mining operations from the prohibition on new road construction or road construction in the final roadless area conservation rule. Recent court rulings have, in fact, found that the Forest Service does have the authority to regulate the means of access to mining claims on National Forest lands, to the point of denying motorized access altogether. See *Clouser v. Espy*, 42 F3d 1522 (9th Cir. 1994).
Rights of access to mining claims are not absolute. The proposed rule as now written attempts to do just that, however. The Forest Service has clear statutory authority to regulate the means of access to mining claims within the National Forests, even if it means requiring access to mining claims be restricted to pack animals or helicopters. Access to mining claims for the purposes of mineral exploration, prospecting, mining or processing operations on the National Forests can and should be limited to non-motorized methods or helicopter access (where necessary) in inventoried roadless areas or that overland access can and should be denied where it would impact other values such as those found in roadless areas.
As in *Clouser v. Espy*, mining claimants often taken the position that any regulation of their access constitutes a violation of the Mining Law's provision "not to … materially interfere with prospecting, mining or processing operations or uses reasonable incidental to …." 30 USC §612(b). However, the court in *Clouser* rejected this claim. "[T]he "materially interfere" standard of 30 USC § 612 does not apply to actions taken by the government to regulate mining-related activities that occur on national forest lands outside of the boundary of the mining claim." 43 F.3d 1552, 1539 (9th Cir. 1994). (Environmental/Preservation Organization, Washington, DC - #52802.53000)

Even less understandable, in light of the Forest Service's authority to regulate means of access to mining claims, is the statement, under the discussion of alternatives 2-4 , that "construction and reconstruction of roads considered reasonable and necessary for locatable mineral exploration and development would be as a right of access guaranteed by the General Mining Law, as amended" (DEIS at 30-143). This attempt at legitimizing suspect statutory right, is untenable, especially given the purpose of the roadless area conservation rule described in

proposed #294.10 and the purpose described in the EIS of "immediately stopping activities that have the greatest likelihood of degrading desirable characteristics of inventoried roadless areas." DEIS at 1-10.
There are no provisions in the General Mining Law that guarantees mining claimants the right of road access to their mining claims or the right to construct or reconstruct roads to these claims on public lands especially before determining if the statutory right to develop a mineral deposit is valid. Additionally, as stated by one leading federal court decision: "Moreover, the Mining law itself makes clear that rights of access to mining claims are not absolute. Such rights are subject to regulation under 30 USC #22." State of Utah v. Andrus, 486 F. Supp. 995,1006 (D. Utah 1979). The Forest Service itself has used the provisions of 30 USC #22 to argue before a federal court that the Organic Act, in fact, gives the agency the statutory authority to regulate the means of access to mining claims in non-wilderness area national forest lands even when the regulation of access increases operating costs and affects claim validity. Clouser v. Espy, 42 F.3d, 1522, 1529, 1530 (9th Cir. 1994) (Environmental/Preservation Organization, Cave Junction, OR - #16188.53000)

THE PROPOSED REGULATIONS ARE NOT CONSISTENT WITH THE MINING LAW AND THE ORGANIC ACT.
The Organic Act's mandate that the Secretary of Agriculture, "shall make provisions for the protection against destruction and depredations upon the public forests and national forests"...implies, in fact, that proposed roadless area conservation rules must provide for the regulation of mining in order to protect national forest roadless areas from destruction and depredation. The Organic Act further specified that person(s) entering the national forest for the purpose of exploiting mineral resources "must comply with the rules and regulations covering such national forests." (Environmental/Preservation Organization, Cave Junction, OR - #16188.53200)

The proposed rule is also flawed because, as it is now written, it appears to give mining claimants carte blanche to construct or reconstruct roads to access mining claims in inventoried roadless areas--this despite the Forest Service's unarguable authority under its Organic Act to regulate activities on the National Forests, including mineral development, exploration and road construction and reconstruction. In court, the Forest Service and Department of Justice have argued that the agency has the authority to restrict access to mining claims to non-motorized methods. Yet the proposed rule and the DEIS have ignored current court rulings, rulings of the Department of Interior and the basic tenet of the Mining Law itself that rights under the law are derivative of the discovery of a valuable mineral deposit. The DEIS has, however, explored a reasonable option which could, with some revision, be inserted into the final roadless area conservation rule so the rule is consistent with the Mining Law rights and with recent decisions by the Department of Interior and the Courts. In addition, the proposed rule excepting mining activities from the general prohibition on road construction and reconstruction in inventoried roadless areas must be amended to be consistent with the Mining Law. (Mining/Oil Company or Organization, Washington, DC - #52502.53600)

Public Concern: The Forest Service should evaluate various processes used to determine mining development rights.

The DEIS states that the liberal use of Surface Use Determinations (SUD) as a management option could be used to "assure the highest degree of protection for roadless characteristics." DEIS at 3-143. While surface use determinations may afford roadless areas greater protection than under the status quo, which generally assumes the discovery of a valuable mineral deposit has been made if a claimant simply submits a plan of operations, valid existing rights determination and regulation of mining operations and means of access would provide the highest degree of protection for roadless areas. Further, reliance of SUD's perpetuates the erroneous assumption that under the Mining Law there are "rights to develop" unpatented mining claims simply because an individual or corporation has filed a claim. (Environmental/Preservation Organization, Cave Junction, OR - #16188.53000)

The DEIS states that determining whether Mining Law rights exist is one option to protect roadless area values. Another option is to conduct a valid existing rights (VER) determination by a certified mineral examiner to verify the existence of statutory rights before conducting an environmental analysis of a plan of operations. DEIS p. 3-142. By amending this option to include the provision that the mining claimant must initially demonstrate the existence of a statutory right prior to being allowed to develop a locatable mineral deposit, the burden of proof at the outset is placed squarely where it should be, on the party proposing to exploit public resources. While the federal government would still make the final claim validity determination, through valid rights determination and contest

proceedings, requiring the claimant at the start to demonstrate "discovery" is likely to eliminate many speculative and spurious mining proposals in inventoried roadless and unroaded areas before a valid existing rights determination is required. (Environmental/Preservation Organization, Washington, DC - #52802.53600)

In short, merely only prohibiting road construction may not protect Roadless Areas from leasable and locatable mineral development. Therefore, all Roadless Areas must be withdrawn or segregated from mineral entry, subject to valid existing rights. (Environmental/Preservation Organization, Boulder, CO - #43734.53000)

Public Concern: The final rule should comply with federal laws governing mining by requiring that valid existing rights apply only to valuable mineral deposits.

Errors and Omissions in the DEIS Regarding the Mining of Locatable Minerals: The DEIS states that the General Mining Law of 1872 affords United States citizens a right to prospect for, claim, and develop minerals on public lands which are subject to the Mining Law. DEIS at 3-142. What the DEIS fails to inform the public and decision-maker about is one of the basic tenets of the Mining Law. The right to develop mineral deposits on public lands is strictly derivative of the discovery of a valuable mineral deposit within the meaning of the law. In other words it is not without condition.
The DEIS goes on to say that exploration and development of a locatable mineral resource are non-discretionary activities, "meaning that the Forest Service cannot prohibit the claiming of or development of valuable deposits." DEIS at 3-142. This is correct in part. The development of a locatable mineral resource is discretionary if the claimant has not discovered a valuable mineral deposit or fails to otherwise comply with the regulations or laws governing public lands. (Environmental/Preservation Organization, Washington, DC - #52802.53600)

Under existing federal law, the concept of multiple use does not apply to mining. If a miner files a claim on Forest Service land, no matter how special or important that land is to other resources, such as wildlife, recreation, watershed, the Forest Service has to let the miners mine a valuable mineral deposit. In the past, a miner could say he had found an economically viable mineral deposit, acquire the land as private by a patenting and take away the public right to multiple use. Currently, Congress has a one-year moratorium, which must be renewed, annually on such patenting. Many impacts from mining are wholly unnecessary because they take place on claims that do not support the discovery of a valuable mineral deposit and are, therefore, not valid or associated with access to mining operations on invalid claims. (Environmental/Preservation Organization, No Address - #22030.53600)

The General Mining Law of 1872 allows miners to secure exclusive rights to mine public lands through the location of valid mining claims. Valid mining claims require, among other things, the "discovery" of a "valuable mineral." Contrary to current practices of the Forest Service and perpetuated in the proposed rule, the mere location of a mining claim does not give the presumption of discovery or a valid claim against the United States. It cannot be emphasized too much that mining claims on federal lands are "valid against the United States [only] if there has been a discovery of [a valuable] mineral and if other statutory requirements have been met." In fact, the Forest Service's and Department of Justice's contention in *Clouser v. Espy*, was that "[u]nder the relevant statutes and regulations, the [agency] need not permit mining operations until it is satisfied that the operator possesses a valid claim." . . . Adding to these are recent rulings from the Department of the Interior which hold, among other things, that "[r]ights to mine under the general mining law are derivative of a discovery of a valuable mineral deposit and absent such discovery, denial of a plan of operations is entirely appropriate." *Great Basin Mine Watch*, 146 IBLA 248, 256 (1998). To paraphrase *Great Basin Mine Watch*, absent the discovery of a valuable mineral deposit, denial of road construction and reconstruction in inventoried roadless areas is entirely appropriate. (Environmental/Preservation Organization, Washington, DC - #52802.53600)

[T]he proposed rule and the DEIS do not address the issue of the need to ascertain whether an actual right to mine exists prior to permitting mining, road construction and reconstruction. The GREAT BASIN MINE WATCH opinion from the Department of Interior makes clear that this RESPONSIBILITY lies with the land managing agency.
Claim validity is determined by the ability of the claimant to show a profit can be made after accounting for the costs of compliance with all applicable laws, and, WHERE A CLAIMANT IS UNABLE TO DO SO, BLM MUST, INDEED, REJECT THE PLAN OF OPERATIONS AND TAKE AFFIRMATIVE STEPS TO INVALIDATE THE

CLAIM BY FILING A MINING CONTEST (emphasis added) GREAT BASIN MINE WATCH, 146 IBLA 248, 256 (1998).
Allowing mineral development on invalid claims--claims where there is no discovery of a valuable mineral deposit and therefore no right under the Mining Law--violates the public trust and the Forest Service's mandate under the Organic Act to make provision against the destruction of the national forests. 16 USC [section] 551.
So as now written, the proposed rule would seem to give mining claimants carte blanche to construct or reconstruct roads to access mining claims in inventoried roadless areas where none existed before--this despite the Forest Service's unarguable authority under its Organic Act to regulate activities on the National Forests, including mineral development, exploration and road construction and reconstruction. The proposed rule's failure to regulate mining activities is further not consistent with the Forest Service's own position in the most important mining case of the decade. In court, the Forest Service and Department of Justice argued that the agency has the authority to restrict access to mining claims to, even to non-motorized methods. Despite these current interpretations of the Mining Law from Department of Interior (DOI) and the courts, the proposed rule and the DEIS have ignored this basic tenet of the Law--that rights under the law are derivative of the discovery of a valuable mineral deposit.
(Environmental/Preservation Organization, Grants Pass, OR - #29018.51000)

MAKING THE FINAL RULE CONSISTENT WITH THE MINING LAW AND COURT RULINGS.
In order to make the final Roadless Area Conservation Rule consistent with the Mining Law, the Organic Act and recent legal decisions and other rulings, a section should be added to the final rule which states at a minimum that: The responsible official shall require information supporting the discovery of a valuable mineral deposit within the bounds of the mining claim before permitting the development of a locatable mineral deposit in inventoried roadless areas (Environmental/Preservation Organization, Cave Junction, OR - #16188.53000)

COURT RULINGS

More recently, the Supreme Court has supplemented this "prudent person" test with a "marketability test," which holds that profitability is a critical factor in determining if a mineral deposit is marketable. United States v. Coleman, 390 S.S. 599, 602 (1968). Factors considered in determining whether a discovery exists under either test include the costs of extraction, processing, and transporting the mineral, including labor and equipment costs, and the cost of satisfying environmental requirements of applicable federal, state, and local laws and regulations (citations omitted). The Forest Service's Manual also notes that: A claim unsupported by a discovery of a valuable mineral deposit is invalid from the time of location, and the only rights the claimant has are those belonging to anyone to enter and prospect on National Forest lands. (Mining/Oil Company or Organization, Washington, DC - #52502.53600)

Public Concern: The Forest Service should provide mining access.

The Mining Laws specifically contemplate roads as a protected means of access for the exercise of statutory mining exploration and development rights. As the 1872 Mining Law provides, all valuable mineral deposits in public lands are to be: free and open to exploration and purchase" and the lands in which they are found to "occupation and purchase." 30 U.S.C. & 22. As confirmed by a 1959 Interior Department Solicitor's Opinion, there is an implied grant to locators of mining claims of free access across the public lands. Rights of Mining Claimants to Access Over Lands to Their Claims, 66 Interior Dec. 361, 1959 WL 7972 (D.O.L.) (1959). As the Solicitor stated:
[L]egislation providing for the making of entries and location necessarily presupposes a right of passage as an incident to the other rights granted, and the general rule that free passage over the public lands has always been recognized
Id. at 363. The Solicitor continues:
As to such national forest lands, Congress in the act of June 4, 1897…expressly reserved the right of ingress and egress to settlers, and to others for "all proper and lawful purpose, including that of prospecting, locating, and developing the mineral resources thereof," subject to compliance with the rules and regulations covering such national forests.
Id. at 362-63. The Solicitor recognized that judicial precedents "obviously recognize the right of a mining claimant to construct roads across public lands for necessary use in mining operations." Id. at 364 (also recognizing that "Congress knew, when it enacted the mining laws, that miners necessarily would have to use public lands outside of

their claims for the running of tunnels and roads" and "roads are necessary as an adjunct to working a claim as a means toward removing the minerals"). Implied authority from Comments of the National Mining Association. Roadless Area Conservation July 14. 2000.
Congress gives a miner the right to build a road, Id. at 366. and although under some circumstances he may not be able to claim exclusive rights to that road. "His right to use it for mining purposes is as evident as his right to mine." Id. Because "the grant of the minerals with all incidents thereunto pertaining is direct from Congress to the miner," an agency may not step in the middle and obstruct the right of passage. Id. (Mining/Oil Company or Association, Washington, DC - #15877.53600)

[T]o the extent the Forest Service posits alternative exploration methods (such as pack-horses or helicopters), it has not considered that these methods are, for the vast majority of mineral deposits, economically infeasible. See Attached Statement of T S Ary, dated July 14, 2000. Requiring such economically prohibitive measures would violate rights of access guaranteed under the law. See Utah v Andrus, 486 F. Supp. 995, 1010-11 (D. Utah 1979) (discussing state rights of access to school trust lands granted by the federal government, and finding that where "it may be that requiring helicopter access... would be sufficiently expensive so as to render minerals...incapable of economic development...requiring such access and denying land access would violate" rights to access minerals). (Mining/Oil Company or Organization, Washington, DC - #52224.50000)

Prior to adoption of the proposed action, we suggest that legal review be conducted to determine if this administrative action can prohibit access to mining claims on the NFS lands (SEE DEIS 3-145). (County Agency, John Day, OR - #16087.53600)

Federal law provides significant statutory rights to mineral exploration, development, and production on the public lands. The roadless proposal seeks to prevent mining exploration, development, and production companies from building roads, and so it will fundamentally infringe these statutory rights. The Forest Service does not have the power to so interfere. As the U.S. Court of Appeals for the Ninth Circuit recently made clear:
Despite much contemporary hostility to the Mining Law of 1872 and high level political pressure by influential individuals and organizations for its repeal, all repeal efforts have failed, and it remains the law. . . . [Miners] are not . . . mere social guests of the Department of the Interior to be shooed out the door when the Department chooses. . . . SHUMWAY, 199 F.3d at 1098-99. (Business/Business Association, No Address, - #43736.53200)

Permitting only aerial access or non-motorized access is a constructive denial of access. To reiterate previous comments, the Forest Service has no authority to prevent access for mineral activities under the Mining Law. As the United States Court of Appeals for Ninth Circuit has recently noted: "Congress has refused to repeal the Mining Law of 1872. Administrative agencies lack authority effectively to repeal the statute by regulations." UNITED STATES V. SHUMWAY, 199 F.3d.1093, 1107, (9th Cir. 1999). In addition, denial or restriction of access may effect a taking under the Fifth Amendment. (Mining/Oil Company or Organization, Washington, DC - #43583.53600)

EXPLORATION ACCESS

Access to the Public Lands is critical to exploration and development of our domestic minerals resources. The Forest Service acknowledges this fact in its document titled 'Forest Service Roads: A Synthesis of Scientific Information.' That report stated that "Federal law and Forest Service policy clearly support exploration for and extraction of resources from public lands....Under the Mining Law of 1872, U.S. citizens and firms have the RIGHT to explore for and stake claims to selected minerals on ALL public domain lands NOT SPECIFICALLY WITHDRAWN from mineral entry," and the "Forest Service cannot unilaterally deny exploration access to National Forest lands." Regarding the use of roads for necessary access, the report explains that the Forest Service "can affect the location and design of roads built on National Forest lands to support energy and mineral activity. In addition, the agency can in some instances place stipulations on access, i.e., limiting road use to occupancy. Constraints that are unduly expensive to fulfill or so restrictive as to make an otherwise economic mineral deposit uneconomic, however, might well be perceived as denying reasonable access."
In light of the clear legal provisions that provide for access to minerals on the public lands, the Forest Service must more thoroughly address how access for minerals will be provided for under the proposal. It is NOT enough to say that the agency will protect "valid existing rights." The mining law guarantees access to public lands to search for

undiscovered and unclaimed mineral deposits--even if there are no pre-existing claims and no "valid existing rights." (Mining Company, Salt Lake City, UT - #6766.71220)

We [Kennecott Minerals Company] find the DEIS to be misleading. On page S-1, it is stated that the "...Forest Service is proposing to prohibit road construction and reconstruction in inventoried roadless areas within the NFS, UNLESS they are needed for public health and safety, FOR RESERVED OR OUTSTANDING RIGHTS, or for other specified reasons." The same statement appears in the last paragraph on page 2-13 where the preferred alternative is described.
However, on page 3-143 there is an ominous statement (Action Alternatives 2 through 4) whereby, "The level of approved activities may be limited under this range of alternatives." This includes the preferred alternative. Furthermore, we are told that the preferred alternative would likely reinforce the trend of decreasing interest in the exploration and development of domestic mineral resources. Kennecott finds it extraordinary that an agency of the United States government would attempt to limit economic endeavor authorized by Congress. (Mining Company, Salt Lake City, UT - #6766.93510)

[T]he regulations found at 36 C.F.R. Part 228 ("Part 228 regulations"), promulgated by the Forest Service in 1974, correctly set the boundaries of the Forest Service's limited authority over locatable mineral resources and mining activities. SEE 39 Fed. Reg. 31317 (Aug. 28, 1974). In the statement of purpose for the Part 228 regulations, the Forest Service recognized that there is a statutory right to enter public lands in search of minerals. Thus, the purpose of the regulations was to:
[S]et forth rules and procedures through which use of the surface of National Forest System lands in connection with operations authorized by the United States mining laws (30 U.S.C. 21-54), WHICH CONFER A STATUTORY RIGHT TO ENTER UPON THE PUBLIC LANDS TO SEARCH FOR MINERALS, shall be conducted so as to minimize adverse environmental impacts on National Forest System surface resources. It is not the purpose of these regulations to provide for the management of mineral resources; the responsibility for managing such resources is in the Secretary of the Interior.
36 C.F.R. [section] 228.1 (emphasis added).
Surely, the proposed restrictions on the construction of roads for mineral exploration and mine development and concomitant DE FACTO prohibition of mine development interferes with that statutory right. The Part 228 regulations, which remain in full force today, require mining claimants to obtain Forest Service approval of a notice of intent or plan of operations, and post necessary bonding to secure compliance with the plan of operation's reclamation requirements, but make no attempt to limit access in the manner contemplated in the proposed roadless rule. SEE E.G., 36 C.F.R. [section] [section] 228.4, 228.5. (Business/Business Association, No Address - #43736.53000)

3.4.4 Consistency Between the Proposed Rule and Existing Laws

In addition to the various mining laws and acts that respondents mention, several individuals and mining companies/organizations also comment on other land and resource management laws and policies that include mining and exploration activities in their directives. Some state that the Federal Land Policy and Management Act (FLPMA) directs the Forest Service to apply to the Secretary of the Interior for any withdrawals of land from mining exploration or development. Others say that the Organic Act either implicitly or explicitly protects mining activities or restricts mining activities. Some state that the Multiple Use Sustained Yield Act (MUSYA) has language designed to preclude any interference with mining operations, or maintain that the Forest Service is in violation of the Forest Service Regulations on Locatable Minerals. One respondent points out that even the language of the Wilderness Act of 1964 protects mining interests and access. Finally, another respondent argues that the Surface Resource and Multiple Use Act of 1955 specifically states that the federal government "shall not endanger or materially interfere with" mining operations.

Public Concern: The proposed rule should be consistent with existing laws as they relate to mining.

FEDERAL LAND POLICY AND MANAGEMENT ACT

The Federal Land Management and Policy Act (FLPMA) also does not provide authority for the Forest Service to deny access to mining claims on National Forest lands. FLPMA expressly preserved the mining claimant's right to access, subject only to the prevention of unnecessary and undue degradation of the lands. Section 302(b) of FLPMA provides "[i]n managing the public lands the Secretary shall, by regulation or otherwise, take any action necessary to prevent unnecessary or undue degradation." Section 302 also states that "except as provided...in the last sentence of this paragraph [the undue/unnecessary language], no provision of this section or any other section of this Act shall in any way amend the Mining Law of 1872 or impair the rights of any locators or claims under the Act, INCLUDING, BUT NOT LIMITED TO, RIGHTS ON INGRESS AND EGRESS." (Mining Association, Spokane, WA - #16091.53300)

FLPMA makes it clear that only the secretary of Interior can withdraw "Federal lands" (both BLM-and Forest Service-managed public domain lands) from "location, or entry, under some or all of the general lands laws, for the purpose of limiting activities under those laws in order to maintain other public values in the area…" 43 U.S.C. section 1702(j), defining "withdrawal," and used in 43 U.S.C. section 1744. (Mining/Oil Company or Organization, Washington, DC - #15877.53300)

THE PROPOSED RULE IS A DE FACTO MINERAL WITHDRAWAL.
The draft EIS acknowledges that "additional areas will be recommended for mineral withdrawal." DEIS S-42 (Effects on the Procedural Alternative-Human Uses) The process for initiating a withdrawal of lands from availability for certain activities is set forth in the Federal Land Policy and Management Act (FLPMA). 43 U.S.C. [section] 1714(a) (c) (d) and (h). The Secretary of Agriculture must apply to the Secretary of the Interior for withdrawal of Forest Service lands. Withdrawals aggregating 5000 acres or more require Congressional notification and public hearings must be held on identified parcels. A mineral withdrawal is defined under the Federal Land Policy and Management Act (FLPMA) as withholding an area of Federal land from settlement, sale, location, or entry under some or all of the general land laws, for the purpose of limiting activities under those laws in order to maintain other public values in the area. 43 U.S.C. [section] 1702(j). (Mining/Oil Company or Organization, Denver, CO - #29952.53300)

If the Forest Service is intent upon proceeding with this action, it must follow the withdrawal procedures mandated by FLPMA at 43 U.S.C. [section] 1714(a) (c) (d) and (h) and the procedures outlined in Forest Service Manual 2700 on Special Use Management--[C]hapter 2760 on Withdrawals. FLPMA section 204 (43 U.S.C. [section] 1714) gives the Secretary of Interior general authority to make withdrawals on public land. Other agency heads such as the head of Forest Service must apply to the Secretary of Interior for withdrawal actions on public lands under their administration. 43 U.S.C. [section] 1714 (c) requires congressional approval of all withdrawals aggregating five thousand acres or more. Even though withdrawals for less than 5000 acres do not have the same requirement for congressional approval, 1714(h) applies to all withdrawals, regardless of size, containing provisions for public hearings. Through this proposed moratorium, the Forest Service is attempting to accomplish the same result as a withdrawal but is circumventing the withdrawal procedures of FLPMA. At a minimum, the Forest Service is required to follow the procedures for Congressional approval for any suspension of road construction in roadless areas of 5000 or more acres.
Courts have determined that actions taken by federal land management agencies can constitute withdrawals necessitating compliance with the FLPMA withdrawal provision. For example, in MOUNTAIN STATES LEGAL FOUNDATION V. ANDRUS, 499 F. Supp. 383. (D. Wyo. 1980), the court found that delays by BLM and Forest Service in deciding whether to approve oil and gas lease applications amounted to an illegal "withdrawal of public land" without prior approval of Congress. The agencies admitted that even though the leases would have been located in non-wilderness portions of various national forests, the delay was necessary to allow the Forest Service time to evaluate those areas for possible inclusion in the wilderness system. In the meantime, the agencies argued they wanted to preserve the status quo of the involved lands. In that case, as under this proposed action, a subset of

public lands would have been put off limits to mining activities without compliance with the proper procedures for withdrawals. (Mining/Oil Company or Organization, Spokane, WA - #16091.53300)

ORGANIC ACT

The Organic Act's mandate that the Secretary of Agriculture, "shall make provisions for the protection against destruction and depredations upon the public forests and national forests"...implies, in fact, that proposed roadless area conservation rules must provide for the regulation of mining in order to protect national forest roadless areas from destruction and depredation. (Individual, Las Vegas, NV - #15882.53200)

Neither MUSYA or NFMA override 16 U.S.C. [section] 478 of the Forest Service Organic Act's express acknowledgment of the "statutory rights" of mining claimants, conferred by the Mining Act to conduct mining operations on public lands. (Mining Association, Reno, NV - #15907.53100)

Interpreting the Forest Service's Organic Act, the U.S. Court of Appeals for the Ninth Circuit recently stated:
[T]he Forest Service may regulate use of National Forest lands by holders of unpatented mining claims,… but only to the extent that the regulations are "reasonable" and do not impermissibly encroach on legitimate uses incident to mining and mill site claims.
UNITED STATES V. SHUMWAY, 199 F.3d 1093, 1107 (9th Cir. 1999) (citing UNITED STATES V. WEISS, 642 F.2d 296, 299 (9th Cir. 1981)). ACCORD SHUMWAY, 199 F.3d at 1107 (right of the Forest Service to manage surface resources shall be such as not to endanger or materially interfere with prospecting, mining or processing operations "or uses reasonably incident thereto"). Roads are most certainly "legitimate uses incident to mining and mill site claims" and the prohibition of roads in inventoried areas would be a material interference with mining that is certainly an unreasonable and impermissible encroachment on legitimate uses. Moreover, if roads ostensibly are prohibited under this proposal in roadless areas, then all surface disturbance associated with legitimate mining ostensibly also would be prohibited, which also is an unreasonable and impermissible encroachment on legitimate uses of the nation's forests. (Business/Business Association, No Address - #43736.53200)

The Forest Service Roads document rightly notes that the USFS does not have the authority to deny access to explore or develop mining claims on National Forest lands. Certainly, the Forest Service's Organic Act does not provide such authority. In the pertinent section, the Act provides that: nor shall anything herein prohibit any person from entering upon such national forests for all proper and lawful purposes, including that of prospecting, locating and developing the mineral resources thereof. Such persons must comply with the rules and regulations covering such national forests. 16 U.S.C. 478.
UNITED STATES V. WEISS, 642 F. 2d 296 (9th Cir. 1981), is the leading case on the Forest Service's authority under its Organic Act to regulate mining activities on National Forest Lands. The court upheld Forest Service regulations (36 CFR 228) relating to mining activities conducted under the 1872 Mining Law on National Forest Lands in the face of challenges that the agency had insufficient statutory authority under its Organic Act to promulgate surface use management regulations. The court noted that the pertinent section of the Organic Act provides: the Secretary of Agriculture shall make provisions for the protection against destruction by fire and depredations upon the public forests and national forests...and he may make such rules and regulations and establish such service as will insure the objects of such reservations, namely, to regulate their occupancy and use and to preserve the forest thereon from destruction." While the court upheld the Secretary of Agriculture's authority to regulate mining operations on national forest land, the court read 16 U.S.C. 478 to mean that mining may not be prohibited or "so unreasonably circumscribed as to amount to a prohibition." WEISS 642 F.2D at 299. (Mining/Oil Company or Organization, Spokane, WA - #16091.52100)

MULTIPLE USE SUSTAINED YIELD ACT

MUSYA does not authorize the Forest Service to prohibit mining activities in the absence of formal withdrawal. MUSYA's declaration of policy states that nothing in the act shall be construed as affecting "the use or administration of the mineral resources of national forest lands..." Neither MUSYA OR NFMA override 16 U.S.C. [section] 478 of the Forest Service Organic Act's express acknowledgment of the "statutory rights" of mining claimants, conferred by the Mining Act to conduct mining operations on public lands. In FOUNDATION FOR NORTH AMERICAN WILD SHEEP V. UNITED STATES, 681 F 2d. 1172, 1182 n 48, (9th Cir. 1982) the court

noted that Forest Service authority under MUSYA "mandates that access to pre-existing mining claims be granted the owners of those claims." (Mining/Oil Company or Organization, Spokane, WA - #16091.53100)

USFS REGULATIONS AND DIRECTIVES

This document ignores the USFS Regulations on Locatable Minerals. (Individual, Lander, WY - #13608.50000)

The range of alternatives except the "No Action" alternative conflict with a number of laws that permit and encourage mining including: USFS Regulations on Locatable Minerals
Road access is necessary for mineral exploration and development activities and CSVI believes that the USFS has neither authority to promulgate this ban on roads nor the statutory authority to prevent or restrict access under the Mining Law. (Mining Organization, No Address - #30435.50000)

Not only is the roadless proposal beyond statutory authority as a de facto withdrawal without the procedure required by law, it even violates the Forest Service's own Manual rules. For example, the Forest Service must comply with the withdrawal analysis outlined in its Forest Service Manual ("FSM") chapter on withdrawals. See FSM [section] 2760 et seq. (dated June 1, 1990). In evaluating the need for a withdrawal initiated by the Forest Service, the manual requires the encouragement of "mineral activity where mineral extraction is the best use of the site," Id. [section] 2761.02(4), and requires Forest Service officers to document new withdrawal of lands from alienation or entry under the mining laws by an assessment of mineral potential, an evaluation of alternatives and an analysis showing that the use or special features of the area cannot be adequately preserved or protected through other means. Neither the encouragement of valuable mineral activity nor the procedural requirements have been honored in this roadless proposal. The Forest Service should conduct this type of detailed analysis prior to proceeding with this rulemaking process.
In another pertinent section, the Forest service Manual notes that withdrawal from mineral leasing should be made rarely since existing public laws, federal regulations, and leasing stipulations provide substantial opportunities to accommodate both surface resources and recovery of leasable minerals. Id. Based on the foregoing, the Forest Service cannot proceed with the proposal until the specific requirements of FLPMA have been satisfied and public comment under that procedure supports the roadless proposal. Again, the Forest Service fails to heed the guidance of its own Manual. (Mining/Oil Company or Organization, Washington, DC - #52224.53000)

WILDERNESS ACT

The Wilderness Act of 1964 specifically states that "in any case where valid mining claims or other valid occupancies are wholly within a designated national forest wilderness area, the Secretary of the Agriculture shall…permit ingress and egress to [claims] by means which have been or are being customarily enjoyed with respect to other such areas similarly situated." 16 U.S.C. section 1134. (Mining/Oil Company or Organization, Washington, DC - #15877.53400)

Indeed, even within congressionally designated wilderness areas, Congress stated that nothing in the Act "shall prevent within national forest wilderness areas any activity, including prospecting, for the purpose of gathering information about mineral or other resources," 16 U.S.C. [section] 1133(d)(2), and it stated that the Secretary of Agriculture "shall, by reasonable regulations consistent with the preservation of the area as wilderness, permit ingress and egress to [valid mining claims or other valid occupancies wholly within such an area] by means which have been or are customarily enjoyed with respect to other such areas similarly situated." 16 U.S.C. [section] 1134(b). THUS, EVEN IN WILDERNESS AREAS, CONGRESS CONTEMPLATED THE EXISTENCE OF ROADS FOR MINING EXPLORATION AND DEVELOPENT. (Mining/Oil Company or Organization, Washington, DC - #52224.53400)

This leads us back to a discussion of the legality of this entire Roadless Conservation Proposal. During studies to determine suitable lands for wilderness designation under the Wilderness Act of 1964, the US Geological Survey was mandated to do extensive mineral resource surveys and, as a result of that work, a number of areas were specifically EXCLUDED FROM WILDERNESS because of mineral resource potential. On page S-195, you specifically state that as a result of this USGS study there are potentially valuable mineral deposits within inventoried roadless areas. By prohibiting reasonable access through road construction and reconstruction, you have circumvented the law. (Individual, Challis, ID - #8034.53400)

SURFACE RESOURCE AND MULTIPLE USE ACT OF 1955

The Surface Resources and Multiple Use Act of 1955 restricted the use of surface resources for unpatented mining claims. It mandated that hereafter located claims could not be used for any purposes not reasonably related to mining. It also reserved to the United States the use of the surface and surface resources. Despite these dramatic changes, the act provides that the right of the United States to manage the surface resources "shall not endanger or materially interfere with" mining operations. 30 U.S.C. [section] 612. The suspension of road construction prevents reasonable access and materially interferes with mining operations. (Mining Association, Spokane, WA - #16091.53000)

3.5 Proposed Legislation/Acts

Some respondents urge the Forest Service to take a stand on, or act in accordance with, a variety of pending, proposed or suggested federal laws. According to these various respondents, the Forest Service should complete hydrocarbon inventories that would be required by the proposed National Energy Security Act; oppose the Conservation and Reinvestment Act; support the Sequoia Ecosystem and Recreation Preserve Act, the Northern Rockies Ecosystem Protection Act, and the National Forest Protection and Restoration Act; and compensate for the loss of school funding from decreased timber harvest by supporting the Secure Rural Schools and Community Self Determination Act. One respondent urges Congress to pass legislation that would prohibit the use of polluting off-road vehicles.

Public Concern: The Forest Service should complete hydrocarbon inventories required by the proposed National Energy Security Act.

COGA asserts that the Draft Roadless Area EIS should be withdrawn unless and until a national inventory of public lands hydrocarbon potential has been completed and incorporated into the analysis, including the impact of current access restrictions. Such an inventory would be required under S. 2557, the National Energy Security Act, pending in Congress. (Business/Business Association, Denver, CO - #52419.55000)

Public Concern: The Forest Service should oppose the Conservation And Reinvestment Act.

I am…asking that you send me a letter stating that you OPPOSE CARA and that you will oppose it when it comes to the floor of the House or Senate. (Individual, Bourg, LA - #3606.34400)

Public Concern: The Forest Service should support the Sequoia Ecosystem and Recreation Preserve Act.

The Giant Sequoias of California are some of our greatest natural wonders…and they must be preserved for future generations. That's why I'm urging you to support the Sequoia Ecosystem and Recreation Preserve Act…and issue a complete moratorium on all road building and logging in all remaining national forest roadless areas. It's important that we preserve these and other vital wild places across the country. (Individual, Washington, DC - #4848.64140)

Public Concern: The Forest Service should support the enactment of the Northern Rockies Ecosystem Protection act.

A far better approach to our current plight would be to enact the Northern Rockies Ecosystem Protection Act and use it as a template for realistic ecosystem protection to be applied throughout our nation. (Individual, Seattle, WA - #1723.22000)

Public Concern: The Forest Service should support the National Forest Protection and Restoration Act.

The U.S. Forest Service as an agency should support and begin preparations in anticipation of the passage of H.R. 1396, the "National Forest Protection and Restoration Act of 1999", which would end all commercial logging on federal public lands. This important bi-partisan legislation is nearing 100 co-sponsors in the U.S. House of Representatives, and would afford the greatest protection to all remaining roadless areas in the National Forest System upon becoming law. (Environmental/Preservation Organization, Clarion, PA - #8413.53000)

Koehler referred to a current bill in Congress, the National Forest Protection and Restoration Act (HR 1396), which would protect national forests from commercial logging while investing money in worker retraining, ecological restoration, alternative fiber research and community assistance. "The National Forest Protection and Restoration Act would provide $500 million annually to put people in rural communities to work restoring the damage caused by over a century of logging in national forests," explained Koehler. "Our future economy does not depend on the exploitation of our national forests, rather it depends on protecting and restoring our national forests." (Individual, Choteau, MT - #6025.54000)

THE PRESIDENT AND CONGRESS SHOULD HEED THE MAJORITY OF AMERICANS WHO DON'T WANT ANY COMMERCIAL LOGGING IN OUR NATIONAL FORESTS. CONGRESS SHOULD PROTECT OUR PUBLIC LANDS BY ENDORSING THE BILL, HR 1396, THE NATIONAL FOREST PROTECTION AND RESTORATION ACT, WHICH ENDS THE HARMFUL LOGGING PROGRAM. (Individual, Kane, PA - #7841.93340)

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. Displaced timber workers are given a hiring preference. In addition, the HR 1396 allocates funds for retraining of these workers to build the skills to conduct restoration activities. (Individual, Bradford, PA - #7842.93700)

I would like to point out some myths and facts of logging our National Forests as my Comments on [the] National Forest Roadless Initiative. They are as follows:
MYTH: NATIONAL FOREST LOGGING GENERATES SCARCE PUBLIC REVENUES, WHICH SUPPORT SCHOOLS, ROADS, AND OTHER PUBLIC WORKS.
FACT: National Forest logging is a net loser from an economic standpoint, and costs federal, state, and county governments far more than the revenues it generates. The federal logging program operates at a net loss of over $1 billion each year. These financial losses, however, are just the tip of the iceberg. The National Forest logging program generates many billions more in "externalized" costs that are passed on to businesses, communities and individuals when National Forests are logged. These include costs incurred by municipal water providers when rivers are polluted by logging as well as jobs and revenue lost by businesses that support recreation and tourism. In addition, heavily logged National Forests are scenic eyesores, diminishing property values and thwarting the ability of communities to attract businesses and residents to enjoy high quality environments. The National Forest Protection and Restoration Act (HR 1396) will end the subsidized federal logging program, saving government at all levels billions each year. In addition, HR 1396 provides funding to replace [the] 25% timber sale revenue sharing payments to States, for Counties, and local governments. (Individual, Bradford, PA - #7842.93640)

Public Concern: The Forest Service should compensate for the loss of school funding from decreased timber harvest by supporting the Secure Rural Schools and Community Self Determination Act.

The road prohibition would set in motion another chain of events. Logging results in payments to forest counties. That funding supports local schools. The joint powers board that Pennington County belongs to, the NCLUCB, is asking the Senate to pass, without amendment, the Secure Rural Schools and Community Self Determination Act. This Act provides stable payments for forest counties to support their schools with a percentage going into a fund to restart long neglected projects on the National Forests. (Individual, Thief River Falls, MN - #7501.93740)

Public Concern: Congress should pass legislation to prohibit the use of polluting off-road vehicles.

I would like to propose that Congress pass legislation that prohibits the use of obnoxious & polluting off road vehicles. In my opinion these types of vehicles totally disrupt & disturb the wildlife population while at the same time causing an extreme amount of noise and emission pollution. The noise & smells that they emit ruin the serenity of the forestlands. (Individual, India Hills, CO - #8443)

3.6 Treaties/Tribal Laws

Some respondents urge the Forest Service to honor the United States' treaty obligations with Native American peoples. One tribal representative states that the proposed rule's allowance for road building under existing treaty rights should be revised to specifically include tribal treaty rights. Another respondent, however argues that in other instances the proposed rule can best honor tribal treaty rights by denying access to roadless areas.

Public Concern: The Forest Service should honor the United States' treaty obligations with Native American peoples.

My concern grows out of an awareness of the sacredness Native American peoples, particularly the Lakota Nation, have for the Black Hills region. It is time the United States began living up to its treaty obligations with Native American peoples from whom we took the land. And at the least, we need to respect Native American feelings about the sacredness of the region. (Individual, Freeman, SD - #3414.40300)

It might also violate or impair treaties with Indian Nations and the rights of indigenous people. (Individual, Douglasville, GA - #18185.50000)

The Tribal Committees are requesting that the following items be considered when adopting the Rule:
Continue to acknowledge the rights and historical uses of The Native American Tribes in the proposed Roadless Areas. (Tribal, Grand Ronde, OR - #29958.56000)

By virtue of the Treaty of 1855, the Nez Perce Tribe maintains treaty-reserved rights to hunt, fish, gather, and pasture cattle and horses within "open and unclaimed lands." These treaty lands include vast areas encompassed in the National Forests of northeastern Oregon, Southwestern Washington, and Idaho. The Tribe believes that the protections provided for by this rule would be consistent with the treaty and trust responsibilities of the United States to preserve, protect, and enhance tribal treaty rights and treaty-reserved resources.
Further, this rule appears to be consistent with the salmon recovery plan adopted by four of the Columbia River treaty Tribes, including the Nez Perce Tribe. *Wy-Kan-Ush-Mi Wa-Kis-Wit: Spirit of the Salmon* calls for, amongst

other actions, a decrease in roaded miles in managed watersheds, as well as improved drainage and decreased sediment delivery from roads that will not be obliterated or relocated. (Tribal, Lapwai, ID - #19309.56000)

Public Concern: The Forest Service should revise the exemptions for road building to include tribal treaty rights.

The proposed rule provides that roads may be constructed or reconstructed if "(a) road is necessary pursuant to reserved or outstanding rights as provided for by statute or treaty." This exception should be revised to explicitly state that road construction and reconstruction may occur to ensure exercise of tribal treaty-reserved rights. (Tribal, Lapwai, ID - #19309.56000)

Public Concern: The proposed rule should deny access to roadless areas in order to honor treaty rights.

The 294.22(b)(3) allows access to honor existing treaty rights. Please also discuss the issue of denying access to roadless areas in order to honor treaty rights. For example the Lakota claim ownership of the Black Hills, what if they don't want a road in a roadless area? (Environmental/Preservation Organization, Rapid City, SD - #52237.56000)

Chapter 4 Alternatives and Rule Development

This chapter contains concerns regarding the development of alternatives and the proposed rule. Public comment in this chapter is divided into ten sections: Development of Alternatives will be covered in Section 4.1; Range of Alternatives in Section 4.2; New Alternatives in Section 4.3; Prohibition Alternatives in Section 4.4; Procedural Alternatives in Section 4.5; Tongass Alternatives in Section 4.6; Alternatives Considered but Eliminated in Section 4.7; Additional Areas for Inclusion in Section 4.8; Exemptions to the Proposed Rule in Section 4.9; and Proposed Rule Development in Section 4.10.

4.1 Development of Alternatives

The development of alternatives for the proposed rule elicited numerous comments from a variety of respondents. One person suggests that the Roadless Initiative be separated into three parts: one that addresses activities to be restricted, one that addresses off-road recreational use, and one that addresses other management issues in these areas. Another individual notes that the proposed rule assumes that the No Action Alternative reduces roadless area values while the other alternatives either conserve or increase roadless values. This person requests that the Forest Service clarify why the value of roadless areas differs under the various alternatives of the proposed rule.

In addition to the general comments regarding alternative development, some people offer alternative-specific suggestions. While one individual believes that the Forest Service should address contradictions between Alternatives 2 and B, another suggests that the Forest Service combine Alternatives 2 and 3 in order to protect areas from timber harvesting.

The No Action Alternative is contentious for many. One wise use organization suggests that the Forest Service compare all proposed action alternatives with the No Action Alternative so as to remain consistent with other forest plans. A timber industry representative, also concerned with forest plans, states that the Forest Service is using the timber volume in fiscal years 1996 to 1999 as its No Action baseline. This person believes that the Forest Service should use the timber sale level as proposed in forest plans as the baseline for comparing alternatives.

Other respondents question the general direction of the proposed rule. One person believes that the proposed rule's alternatives should focus on the best way to manage land and resources rather than on prohibitions. Another citizen, believing that the local forest manager should not have discretionary power regarding roadless areas, exhorts the Forest Service to delineate exactly what activities will be allowed in roadless areas in the Environmental Impact Statement. "The local manager is constantly under pressure from local politicians, ORV groups, loggers, ranchers, mining companies, local developers, etc. to allow all types of activities in our national forests which would be detrimental to the environment," this individual proclaims.

Public Concern: The Roadless Initiative should be separated into three parts: one that addresses activities to be restricted, one that addresses off-road recreational use, and one that addresses other management issues in these areas.

The roadless initiative should therefore be separated into three parts. Part One would address the need to protect our forest from mining, timber logging and development activities and to prevent clear cutting and harvesting of vegetation on or within these designated areas. Part Two would address the need to provide areas for off road recreational use. Possibly designating specific areas for a specific recreational use in order to protect these areas but also for the government to provide recreational access to public lands. A lockout of these lands would no longer mean public lands. Part Three would involve the U.S. Forest Service's duties and responsibilities for managing these designated areas. This would include plans of action for forest fires, natural disasters, monitoring the protection of the forest from mining, logging and timber industries. Also to include the possible development of recreational uses in designated areas. Monitoring or limiting the number of people in these areas. Setting regulations and standards for hiking, bicycling, horseback riding, fishing, hunting and off-road vehicle use. (Individual, Magnolia, DE - #2712.61300)

Public Concern: The Forest Service should clarify how the value of roadless areas would differ under the various alternatives of the proposed rule.

It is stated in the Proposal that areas without roads have nine (as listed) inherent values and characteristics. As one then follows the alternatives the assumption seems to follow that the "No Action" Alternative A reduces value and as one "progresses" towards other alternatives value is conserved or increased. This assumption takes a powerful lot of liberty with objectivity and as far as I know comes with little or no data. (Individual, International Falls, MN - #9195.64000)

Public Concern: The Forest Service should address contradictions between Alternatives 2 and B.

Alternatives 2 and B seem to be somewhat contradictory—why? (Individual, Pocatello, ID - #2959.6200)

Public Concern: The Forest Service should combine Alternatives 2 and 3 in order to protect areas from timber harvesting.

Since only four percent of projected NFS timber harvest was to come from IRA's this is an insignificant portion of total domestic harvest. Only five percent of national wood production comes from NFS lands. Four percent of five percent leaves one quarter of one percent of the domestic timber supply affected by this proposal. This leads me to believe that a fusion of prohibition alternatives 2 and 3 may be favorable; some IRA's would best be left alone entirely with very limited harvest activities in others. These areas could be selected after further analysis that considers factors such as proximity to other protected areas, habitat diversity, size, and position in the landscape. We can and should err on the side of conservation. (Individual, Leavenworth, WA - #15897.61300)

Public Concern: The Forest Service should compare all proposed action alternatives with the No Action Alternative.

All proposed action alternatives need comparison with "No Action" (current use-prior to the new roads moratorium) to remain consistent with all national forest planning. (Wise Use Organization, Rock Springs, WY - #2866.64000)

Public Concern: The Forest Service should use a proper baseline for comparing alternatives.

THE DEIS USES AN IMPROPER BASELINE FOR COMPARING ALTERNATIVES AGAINST THE "NO ACTION" ALTERNATIVE AND THUS SERIOUSLY UNDERESTIMATES THE ECONOMIC IMPACTS. 1. LEGAL DEFICIENCES. The DEIS engages in misdirection which hides the true socioeconomic impacts of the substantial reduction in timber volume attributable to the rulemaking. The Council on Environmental Quality has stated that the impacts of the "no action" alternative (the baseline used for calculating the incremental impacts of the alternatives) in forest planning should be the projected impacts of continuing to implement the forest plan. [Where a proposed action would] updat[e] a land management plan.... "no action" is "no change" from current management direction or level of management intensity.... Therefore, the "no action" alternative may be thought of in terms of continuing with the present course of action until that action is changed. Consequently, projected impacts of alternative management schemes would be compared in the EIS to those impacts projected for the current plan. 46 Fed. Reg. 18026, 18027 (March 1, 1981) (CEQ's Answers to 40 Most Asked Questions on NEPA Regulations). Yet, the DEIS does not compare the impacts of the roadless rulemaking to the "impacts projected for the current plan" if the full level of timber sales projected in the forest plan (the timber sale schedule level, SEE 36 C.F.R. 219.16) are conducted. Instead of using the timber sale schedule level prescribed by timber plans, the lower "timber volume in FYs 1996 to 1999 was used in developing the baseline for the No Action Alternative." DEIS at 3-182. Since use of this baseline is contrary to CEQ's direction, the correct baseline should be employed (or at least portrayed as an alternate basis for comparison) in the final EIS. (Timber Industry, Eugene, OR - #15879.54100)

Public Concern: Alternatives in the proposed rule should focus on the best way to manage land and resources rather than on prohibitions.

Alternatives should focus on the best way to manage these lands and their resources, not how to prohibit uses by the American people. (Recreational Organization, Saint Charles, MN - #6878.84000)

Public Concern: The type of activities to be allowed in roadless areas should be clearly spelled out in the Environmental Impact Statement.

None of the alternatives are acceptable. The local forest manager SHOULD NOT have the power to determine the type of future activities allowed in roadless areas. INSTEAD THE TYPE OF ACTIVITIES TO BE ALLOWED SHOULD CLEARLY BE SPELLED OUT IN THE EIS. The local manager is constantly under pressure from local politicians, ORV groups, loggers, ranchers, mining companies, local developers, etc. to allow all types of activities in our national forests which would be detrimental to the environment. If the local forest manager is given the final authority on this issue there is 100% chance that many roadless areas will suffer irreparable future damage. (Individual, Richland, WA - 31006.64200)

4.2 Range of Alternatives

Several respondents suggest that the Forest Service should expand the range of alternatives for the proposed rule. The use of temporary roads for forest management should be included among the alternatives, according to one person. An Idaho resident believes that the EIS should include a range of alternatives that varies the amount of roadless acres.

"Except for Alternative 1, No Action, there is not a distinct difference between alternatives," posits one elected official. Citing a similar concern, one citizen believes that the Forest Service

should not attempt to create one generalized alternative to cover all the disparate roadless areas of this nation.

Other respondents offer alternatives they believe would create a suitable range of alternatives. "One alternative should clearly be that road building and access are pursued in these areas and they are released into multiple-use management," suggests one constituent. Another individual believes that the Forest Service should consider an alternative that addresses the impacts of recreation, timber, and mineral interests in Regions 8 and 9. "The DEIS needs to consider such an alternative," this person states. "Short of that, the DEIS cannot be said to be adequate."

Public Concern: The Forest Service should expand the range of alternatives for the proposed rule.

The scope of the alternatives is too narrow. (Individual, Eugene, OR - #537.60000)

The NOI is deficient in the range of alternatives, which is difficult when you do not know what lands you are talking about. (Individual, Titusville, PA - #905.60000)

For a document of this magnitude and potential impact, additional alternatives should have been fully developed and evaluated that ensure the forest management is done in a consistent manner within the scope of this proposed rule and the NFS Road Management Strategy. (Individual, San Diego, CA - #2876.63000)

ALLOW THE USE OF TEMPORARY ROADS

The Forest Service has not presented a reasonable range of alternatives. The use of temporary roads to address forest management is an alternative that should be included. (Individual, Paonia, CO - #11343.61300)

The Forest Service should have considered an alternative which would allow access to roadless areas by temporary roads. Temporary roads or winter roads are common in the Lake States Region and have a negligible impact on the key Forest Service considerations of water quality and biodiversity. Temporary roads would allow access for timber harvest, preserving forest health and ultimately improving biological diversity. (Timber Association, Iron Mountain, MI - #43202.61300)

VARY THE AMOUNT OF ROADLESS ACRES

The EIS should include a range of alternatives that varies the amount of roadless acres, or the amount of roadless areas, for which environmentally sensitive multiple use road construction is allowed. (Individual, Lewiston, ID - #10607.60000)

We also believe the Forest Service should develop a wider range of alternatives that vary the amount of roadless acres or the number of roadless areas for which environmentally sensitive road construction is allowed. (University/Professional Society, Helena, MT - #11164.60000)

Public Concern: The Forest Service should provide alternatives that have distinct differences.

Except for Alternative 1, No Action, there is not a distinct difference between alternatives. Review of S-1 on pages S-18 through S-23 shows that the results from Alternatives 2, 3, and 4 are about the same. (County Elected Official, Quincy, CA - #16184.60000)

Public Concern: The Forest Service should not attempt to generalize any alternative.

I feel the idea that we can generalize an alternative is incorrect. An example is an old growth forest would use alternative #4, because it obviously could take care of itself and we could harvest "tree lots" and not spoil the wild places. And yet a place previously logged could use alternative #3 to help it return to a healthy environment. (Individual, Colville, WA - #1027.64400)

Public Concern: The Forest Service should consider an alternative that allows road building, continued access, and multiple use management.

One alternative should clearly be that road building and access are pursued in these areas and they are released into multiple-use management. (Individual, Titusville, PA - #905.60000)

Alternatives must be expanded to permit road construction in some of the roadless areas to help the economy and for job opportunities in our northern region. (State Elected Official, Sandpoint, ID - #10682.60000)

Public Concern: The Forest Service needs to consider an alternative that carefully considers the impacts of recreation, timber, and mineral interests in Regions 8 and 9.

Considering the significant ecological problems throughout the region 8 and 9 of the Forest Service, and the significant pressures upon those forests from the recreation, timber, oil, and mineral interests, it is critical that impacts of allowing significant disturbances into these areas needs to be carefully considered. These regions need to have their remaining contiguous habitats protected form these significant disturbances. The DEIS needs to consider such an alternative. Short of that, the DEIS cannot be said to be adequate. (Individual, Brookport, IL - #126.82000)

4.3 New Alternatives

Rather than suggesting specific changes to the development of alternatives or the alternatives themselves, a few respondents propose completely new alternatives. One citizen believes that the Forest Service should develop an "access for all" alternative. Another individual exhorts the Forest Service to prepare an alternative that assigns the decision-making authority based on local conditions.

One environmental organization has prepared its own "Preservation Alternative." This alternative should be included in the Final EIS as a new Alternative 5, according to this group. A timber industry representative believes that the Forest Service should consider an alternative that would not ban road construction in inventoried roadless areas that were considered in post-1995 revisions to forest plans. One elected official suggests that the Forest Service consider an alternative that allows leasable mineral extraction and analyzes and compares those impacts with the No Action Alternative. An environmental organization suggests an alternative that returns to Native Americans land ceded to the Federal Government by treaty. One individual requests that the Forest Service develop an alternative that prohibits road building and timber harvest in roadless areas that are sources of drinking water.

Public Concern: The Forest Service should develop an "access for all" alternative.

I ask the Forest Service to develop and evaluate one or more "access for all" alternatives in the EIS which would allow roads access and the full range of multiple uses of some or all of the roadless areas. The EIS should include a range of alternatives that vary the amount of roadless acres, or the number of roadless areas, for which environmentally sensitive multiple use road construction is allowed. (Individual, Hayden, ID - #13704.63000)

Public Concern: The Forest Service should prepare an alternative that assigns the decision-making authority based on local conditions.

To correct the situation, I would recommend the roadless area evaluation begin at the field level through the forest planning process. For roadless areas that contain roadless values and characteristics that appear to outweigh the human uses, and the social and economic factors, a report and recommendation would be submitted to the chief for a national decision. For roadless areas that have human values, and social and economic values that outweigh the roadless area values and characteristics, the prescribed management direction would be made by the regional forester for the next planning period. Such a preferred alternative could be included in the final rule, following site specific evaluation, as an alternative embracing both the no action and the prohibition alternatives. (Individual, McMinville, OR - #10391.61300)

Based on our understanding of the roadless regulations, it appears that every surface disturbing action in a designated roadless area will require an EIS since, ostensibly, the applicable requirement is satisfied of a potential "major federal action significantly impacting the human environment" as required by NEPA. Presently, proposed surface disturbing activities within "roadless" areas are handled under NEPA as appropriate, which may entail merely a Categorical Exclusion or Environmental Assessment – Rather than always requiring an EIS. Retaining some ability to perform appropriate NEPA analysis tailored to the activity involved, rather than eliminating appropriate discretion and always requiring an EIS, would reduce unnecessary Forest Service workload and allow timely activities by proponents. Moreover, if the Forest Service disagrees with the existing practice of allowing appropriate NEPA analysis, then the Forest Service must clarify how every EIS for activities in a roadless area somehow appropriately triggers and satisfies NEPA's mandate of a major federal action significantly impacting the human environment necessitating an EIS. (Mining/Oil Company or Organization, Washington, DC - #52224.54100)

Public Concern: The Forest Service should adopt a new Alternative 5.

We have reviewed the DEIS and do not support the preferred alternative proposed by the Forest Service. We do support, in accordance with our comments of December 20, 1999, a modified Alternative 4, which should be included in the Final EIS as Alternative 5: the Preservation Alternative. (Environmental/Preservation Organization, Willits, CA - #6908.61300)

Public Concern: The Forest Service should consider an alternative that would not ban road construction in inventoried roadless areas that were considered in post-1995 revisions to forest plans.

We urge the Forest Service to consider an alternative that would not ban road construction in inventoried roadless areas that were considered in post-1995 revisions to forest plans. This alternative has the advantages of: (1) respecting the analyses conducted and multiple use decisions made on roadless areas in recent forest plans, (2) respecting the public comment on roadless areas in recently revised forest plans, and (3) making the millions of dollars recently spent in revising forest plans worth something, by not overriding recent plan decisions on appropriate uses of individual roadless areas. (Timber Industry, Eugene, OR - #15879.64400)

ALTER.818 Public Concern: The Forest Service should create a leaseable minerals alternative.

The Forest Service needs to consider an alternative that allows leasable minerals and analyzes the impacts and compares those impacts against the No Action Alternative. (County Elected Official, Fallon, NV - #17290.60000)

Public Concern: The Forest Service should consider an alternative that returns treaty-ceded lands to traditional native peoples.

The EIS should also develop alternatives that return treaty-ceded lands to traditional native peoples (as distinctly different from BIA created corporate controlled "Tribal" Councils) to be held in perpetuity as natural ecology and wildlife reserves. (Environmental/Preservation Organization, Fossil, OR - #52433.56000)

Public Concern: The Forest Service should consider an alternative that prohibits road building and timber harvest in roadless areas associated with drinking water.

Please provide an alternative that stops these activities [road building and timber harvest] only on the roadless areas that are directly associated with drinking water. (Individual, Darby, MT - #27855.70000)

4.4 Prohibition Alternatives

Public comment regarding the proposed alternatives generally falls into three categories: support for a given alternative, requests for modification of a given alternative, or opposition to a given alternative. Many people's support of or opposition to a given alternative is largely influenced by the degree to which the alternative promotes resource protection, provides recreational access, and restricts road building, logging, and mining. The reader should note that public concerns addressing alternatives with respect to specific resource areas are included in the appropriate resource area sections of this analysis document. General comments regarding the Prohibition Alternatives will be analyzed forthwith.

Page 3-122 of the Draft EIS states: "An underlying assumption in Alternative 1 is that inventoried roadless areas, outside of Wilderness and other designated areas, are available for resource management activities that may degrade their unroaded characteristics." According to one elected official, this is a false assumption because forest plan prescriptions govern which activities are allowed and which are prohibited on National Forest lands. This official believes that this assumption will significantly overestimate the effects of road construction, reconstruction and timber harvest in the No Action Alternative and underestimate the effects on the Prohibition Alternatives.

The clarity of language of the alternatives is a concern for some. One person notes that the summation of Alternative 2 does not mention logging, although the actual language of the alternative does not preclude this activity. On a similar note, another individual requests that the Forest Service explicitly explain what criteria were used to determine that road construction and timber harvest would qualify as prohibited acts.

One individual believes that the Forest Service should implement Alternative 3 west of the 100th meridian and Alternative 4 east of it in order to properly address the ecological differences of the two areas.

Specific public concerns regarding the actual alternatives will be addressed in following Subsections; 4.4.1, Alternative 1; 4.4.2, Alternative 2; 4.4.3, Alternative 3; 4.4.4, Alternative 4.

Public Concern: The Forest Service should address false assumptions in the Prohibition Alternatives.

Comment: Page 3-122, Alternative 1, first paragraph-- This paragraph states that the "...underlying assumption in Alternative 1 is that inventoried roadless areas, outside of wilderness and other designated areas, are available for resource management activities that may degrade their unroaded characteristics." This assumption is totally false for two reasons: 1) The document itself (Page 3-1, Overview of Inventoried Roadless Areas) states that "...road construction and reconstruction is already prohibited on about 20.5 million acres," and 2) forest plan prescriptions govern which activities are allowed to take place and which are prohibited within given areas of a National Forest. If this assumption was used, as stated, then this analysis has little credibility to adequately determine effects of any of the alternatives. Relief: The Forest Service must eliminate this assumption and develop an assumption that reflects an accurate scenario. The assumption, as written, will significantly overestimate the effects of road construction, reconstruction and timber harvest in the "No Action" alternative and underestimate the effects on the prohibition alternatives. (County Elected Official, Worland, WY - #16185.70000)

Public Concern: The Forest Service should clarify the prohibition alternatives dealing with timber harvest.

I just had a couple of comments on the draft environmental impact statement. The first is in the description of the alternatives. I note that Alternative 2 in its description up front doesn't mention that logging would continue in inventoried areas just without roads, and we could continue through cables and from the air. I think that's a really important point because a lot of people who may be opposed to logging might still vote for No. 2 because from the impact statement you can't really tell that logging would continue. It's only from another source that became clear. (Individual, No Address - #21329.33200)

Public Concern: The Forest Service should explain what criteria were used to determine that road construction and timber harvest qualify as prohibited acts.

Under the question concerning how the FS determined what activities to include under the prohibition and procedural alternatives, it would be helpful to know what the definition of the criteria are that were used to make the determinations that road construction and timber harvest qualify as prohibited acts. (Individual, Moses Lake, WA - #718.60000)

Public Concern: The Forest Service should implement Alternative 3 west of the 100th Meridian and Alternative 4 east of the 100th Meridian.

A consideration of another way of dealing with ecological differences might be to implement Alternative 3 west of the 100th meridian and Alternative 4 east of it. (Individual, Deer, AR - #44200.61300)

4.4.1 Alternative 1

Citing political and economic reasons, many respondents support the No Action Alternative. One Nevada resident believes any other alternative "would interfere with and hamper efforts by the Nevada Department of Wildlife to manage wildlife within the state." Citing the fact that more study is needed, another individual proclaims that "many issues [are] already on the board that need to be addressed before this plan could be implemented with any amount of confidence and assurance that important components have not been overlooked."

One recreational organization believes that Alternative 1 should be modified to initiate a viable program of land use education. Another respondent, asserting that Forest Service managers need flexibility in their decision making process, requests that the Forest Service adopt Alternative 1D.

Public Concern: The Forest Service should adopt the No Action Alternative.

I would request that no action be taken. It is not a good thing to designate any area as roadless. (Individual, Fountain Green, UT - #815.61100)

NO ACTION should be the preferred and selected alternative for this hair brain scheme by the Clinton Administration to create more de facto-spaghetti wilderness. (Individual, Troy, MT - #1294.61100)

Please select the "no action" alternative for this proposal. This roadless area proposal is a purely political move and should not be given the time of day. (Individual, Gainesville, GA - #2155.61100)

The natural resources such as TIMBER, GAS, OIL, COAL, MINING, GRAZING AND RECREATING CONTRIBUTE TO OUR STANDARD OF LIVING AND THE HEALTHY ECONOMIES OF OUR COMMUNITIES. We all pay dearly for the privilege to use the forest under the strictest environmental laws in the free world directed under "NEPA" where we all have input. As a result to ensure our country does not become dependent on foreign imports for our resources I support Prohibitive Alternative #1 and Procedural alternative "A". (Individual, No Address - #2160.61100)

I support the no action alternative. We don't need any more roadless areas set aside. There is more than enough wild and scenic, wilderness areas, special areas, monuments, parks etc. today. (Individual, Susanville, CA - #3585.61100)

MANAGE WILDLIFE WITHIN NEVADA

I suggest that the proposed alternatives, other than 1, A or T-1, would interfere with and hamper efforts by the Nevada Department of Wildlife to manage wildlife within the state and our various fire fighting districts to control seasonal fires at the community level. (Individual, Wellington, NV - #7563.62000)

MORE STUDY IS NEEDED.

I urge that the "no action alternative" be taken at the present time. More study is needed and there are many issues already on the board that need to be addressed before this plan could be implemented with any amount of confidence and assurance that important components have not been overlooked. (Individual, La Grande, OR - #7671.61100)

Public Concern: The Forest Service should adopt a modified version of Alternative 1.

I'm in favor of Alternative #1 with some modifications. Which are: No prohibitions on activities on our public land except where mandated by ecosystems, environmental concerns, or other local area special concerns. The land, forest and BLM lands, belong to the American people, the Government is just taking care of it for us. (Individual, No Address - #2416.64110)

I recommend choosing the no Action alternative (Alternative #1) with the following constraints:
Accelerate the completion of planning under RARE 2 for all the Roadless Area Acres.
Balance planning teams so that resource based planners at least equal the numbers of environmentally inclined planners. Include representation from the following groups as advisors and participants in the planning process. 1. Industry representatives from resource user groups. 2. County Commissioners. 3. State Resource management agencies. 4. Others as appropriate. Revise the appeals process to quickly dispose of frivolous appeals and lawsuits designed to delay planning decisions of designated roadless areas. (Individual, Kooskia, ID - #6765.71230)

LAND USE EDUCATION AND FUNDING

The "No Action" Alternative should be modified to initiate a viable program of land use education, partnering with public interest individuals and groups to enhance effective land management, and revamping the funding and resources available to the Forest Service. (Recreational Organization, Salt Lake City, UT - #15896.61100)

Public Concern: The Forest Service should adopt Alternative 1D.

I favor alt. 1 of the prohibition alts and alt. D in the procedural set. FS managers need flexibility in order to meet challenges to the health of the forests AND increasing demands for recreation, etc. (Individual, Missoula, MT - #7269.83000)

4.4.2 Alternative 2

Many respondents support the Preferred Alternative. However, others believe that the Forest Service should modify Alternative 2. Allowing off-highway vehicle (OHV) access, including recreational values, and protecting species are some of the concerns individuals suggest should be emphasized in the Preferred Alternative.

While some respondents express support for Alternative 2C and 2D, others feel that the Forest Service should not adopt Alternative 2. The Preferred Alternative does not protect unroaded areas, apart from the inventoried roadless areas, according to one citizen. "The problem is exacerbated by your choice of 'Procedural Alternative B,' which seems to grant unlimited discretion over the unprotected roadless areas exempted by 'Alt. 2' to local managers who are likely to be most susceptible to local pressures for desecration of all remaining roadless areas," this constituent asserts. While not advocating the abolition of the Preferred Alternative, some respondents question its scientific validity. These people request that the Forest Service cite studies that support Alternative 2.

Public Concern: The Forest Service should adopt the Preferred Alternative.

I support the Forest Service's roadless initiative and I would very much like to see the preferred alternatives (prohibition alternative #2, procedural alternative B, and Tongass National Forest alternative #T3) adopted into the final rule. (Individual, Ewen, MI - #1301.61200)

I think the current version of the National Forest Service Roadless Initiative represents a reasonable compromise. (Individual, Great Falls, MT - #1293.61200)

Public Concern: The Forest Service should modify its Preferred Alternative.

The proposed alternative in the Draft Environmental Impact Statement for protecting national forest roadless areas must be improved in two ways: It must provide IMMEDIATE AND COMPLETE protection for Alaska's Tongass National Forest and it must protect ALL national forest roadless areas, including Alaska's Tongass and Chugach, from logging, and other exploitation, as well as new roads. (Individual, Millersville, PA - #114.61300)

I am in agreement with the Prohibition and Procedural Alternatives being proposed (#2 and #B, respectively) conditional on the Rule delegating to local authority the decision(s) to build new roads into the subject roadless areas in cases of extenuating circumstances such as for public health and/or safety, environmental enhancement/health, etc. (Individual, Wenatchee, WA - #813.61300)

ALLOW OFF-HIGHWAY VEHICLE ACCESS

Please add language to the preferred alternative to include 'no net loss' of OHV access via trail or forest roads to these roadless areas. Also, please underscore that the land manager has the option and is encouraged to increase trail miles where appropriate to lessen impact on a per-square-mile basis. (Individual, Littleton, CO - #134.61300)

INCLUDE ALL RECREATIONAL VALUES

Please alter the language in the preferred alternatives to include all recreational values of the subject areas, including OHV, trail motorcycle, and mechanized vehicle access and recreational use. I have to assume from the well-done PowerPoint informational presentation that the USFS intends to preserve recreational values in roadless areas, including OHV and 4-wheel drive usage, but the language must be more explicit in preserving existing recreational values. It must allow land managers the highest flexibility to evaluate improvement and/or expansion of trails and forest roads. Land managers must be strongly encouraged to use more creative means to manage trails than 'closure' -- and to use closure only as a LAST resort, not the first one. (Individual, Littleton, CO - #134.91700)

PROTECT SPECIES

Through law we have determined that every species has a right to live. Please keep that in mind when you look at your preferred alternative for the Roadless Initiative, which would further endanger or even push to extinction many species, and please change the preferred alternative to do more to protect these species. (Environmental/Preservation Organization, No Address - #1826.83520)

Public Concern: The Forest Service should adopt Alternative 2C.

If all unroaded land acquired in recent land exchanges is included, Alternative 2 is the best alternative for roadless area protection, but only when combined with Procedural Alternative C. (Environmental/Preservation Organization, Bozeman, MT - #16097.61300)

Public Concern: The Forest Service should adopt Alternative 2D.

The Vermont Fish and Wildlife Department recommends that the U.S. Forest Service consider 2D as the most appropriate alternative to protect the roadless area values of both the inventoried and uninventoried areas. We appreciate the opportunity to offer these comments and hope that you will seriously consider them as a basis to improve and enhance the roadless area proposal. (State Agency, Waterbury, VT - #19299.61300)

Public Concern: The Forest Service should not adopt the Preferred Alternative.

Your "preferred alternative" #2B is totally unacceptable--but not surprising. You don't seem to grasp the concept that our national forests are not your private tree farm. You need to understand that our national forests are a priceless asset not to be squandered. (Individual, Nashville, TN - #1153.61200)

I am writing to express my profound concern regarding the 'Proposed Action and Preferred Alternatives' included in your Draft Environmental Impact Statement on Roadless Area Conservation. My concern is, first and foremost, for your choice of 'Alternative 2' re Road Construction. Manifestly, this does NOT protect unroaded areas, apart from the inventoried roadless areas. The problem is exacerbated by your choice of 'Procedural Alternative B,' which seems to grant unlimited discretion over the unprotected roadless areas exempted by 'Alt. 2' to LOCAL managers who are likely to be most susceptible to local pressures for desecration of all remaining roadless areas. Although local managers are evidently to be admonished to 'consider' all relevant social and ecological issues, no principles are articulated which would actually structure decision making in such a way as to coherently and consistently defend the integrity of the areas in question. Finally, your choice of 'Alternative T3' regarding the Tongass is scandalous at best. What basis is there for treating the Tongass any differently from the rest of the land in Forest Service jurisdiction (other than strictly political considerations)? Again, decision-making is to be delegated to local authorities and hidden behind a mask of unstructured discretion. (Individual, Stelrekin, WA - #989.61200)

Public Concern: The Forest Service should cite studies which support the Preferred Alternative.

The quality of this DEIS reflects the rush in which it was prepared to satisfy political agendas. It lacks specific studies designed to provide useful and pertinent information to support the preferred proposal. (Recreation Organization, Salt Lake City, UT - #15896.60000)

4.4.3 Alternative 3

While several respondents support the adoption of Alternative 3, others believe that the Forest Service should adopt a modified version of Alternative 3. A moratorium on road building in the Tongass National Forest, fire prevention measures, and a public oversight process are some of the provisions people wish to see included in the alternative.

Other citizens express support for the implementation of Alternatives 3C, 3D, and 3DT4. One respondent who supports Alternative 3 also requests that the Forest Service clarify what activities will be allowed under this alternative.

Public Concern: The Forest Service should adopt Alternative 3.

These benefits can best be achieved by Prohibition Alternative 3. Prohibiting timber harvest except for stewardship purposes will maximize the benefits while not having much more of an economic impact than alternative 2 has. The inventoried roadless areas only represent 28% of the NFS lands. 72% is still available for timber harvest and road based recreation. Prohibiting new road construction and non-stewardship timber harvest will not be a large hardship. (Individual, Wheaton, IL - #156.64130)

My initial review of the alternatives was inclined towards recommending alternative #4. I think the goal should be the full establishment of natural fire regimes throughout the planning area. Initially I did not think that alternative #3 was best. My concerns with alternative #3 are related to the frequent practice in western national forests of proposing "Forest Health Treatment" which are thinly disguised timber harvests. I am skeptical that timber harvests in alternative #3 will truly be used only in cases where stewardship is needed. However after consideration, I am convinced by the DEIS arguments that the risk of catastrophic wildfires associated with Alternative #4 is not warranted. Therefore my preferred prohibition alternative is #3. Alternative #2 seems to rely on economic realities to limit logging in the unroaded areas. This may be effective, but I feel the definitive limits on timber harvest are found in Alternative #3. (Individual, Rowlett, TX - #954.64130)

Public Concern: The Forest Service should adopt a modified version of Alternative 3.

INCLUDE A MORATORIUM ON ROAD BUILDING IN THE TONGASS

In #3, I believe that there should be a moratorium on building roads in the roadless areas in the Tongass until the decision is made in 2004. (Individual, No Address - #467.61300)

INCLUDE FIRE PREVENTION MEASURES

I prefer Alternative 3 with some safeguards. Fire suppression has put many western forests at risk. I support stewardship in the form of fire prevention by thinning undergrowth IF there is a protocol for the maximum diameter of stems and trunks that will be removed. Also we need to limit the number of years when this kind of stewardship will be practiced. (Individual, Ashland, OR - #6905.64130)

INCLUDE A PUBLIC OVERSIGHT PROCESS

The modification that I would make to Alternative 3 would be to add an oversight process that is open to public scrutiny and incorporates the best ecological science to ensure that stewardship harvests do not become commodity harvests in disguise. (Individual, Portland, OR - #15333.64130)

Public Concern: The Forest Service should adopt Alternative 3C.

I believe that the proposed prohibition on roadbuilding and reconstruction is good but weak. I prefer alternative 3, permitting only stewardship timber harvest, and alternative C, project based evaluation. (Individual, Henderson, NV - #2384.61300)

Public Concern: The Forest Service should adopt Alternative 3D.

We support the roadless area conservation proposal and feel that Prohibition alternative 3 and Procedural Alternative D most closely fit our ideas of what roadless areas should be and what the procedure should be for planning at the forest level. (Business, Lander, WY - #4567.61300)

Public Concern: The Forest Service should adopt Alternative 3DT4.

For the Tongass option I support 3DT4 option. In regard to ORVs, I support 3D, allowing local forests to make decisions. (Individual, Duluth, MN - #2950.61300)

Public Concern: The Forest Service should clarify what activities will be allowed under Alternative 3.

The preferred alternative (#2 in the brochure) does not go far enough in protecting the forests as such. Timber harvest except for stewardship purposes must be eliminated. Thus alternative #3 is preferred (#4 is too extreme). Add to alternative #3 what will be and what won't be allowed. What low impact activities (such as hiking and cross-country skiing) will be allowed? The Tongass National Forest should be included in alternative #3 now. (Individual, Sunriver, OR - #1258.64130)

4.4.4 Alternative 4

Although many respondents exhort the Forest Service to adopt Alternative 4, these constituents include caveats to their support. In addition to the prohibition on road construction and timber harvest, many of these people would like to also see prohibitions on mining, grazing, OHVs, and commercial development. Others request clarification on Alternative 4's timber harvest prohibition; specifically, the harvest of "dead and down" trees. Several individuals support Alternatives 4A, 4B, and 4D as well.

Of those that support Alternative 4D, many insist that this alternative should be expanded to include all roadless areas in the United States. Similarly, one person supports the adoption of Alternative 4DT3 with the caveat that the Forest Service expands protection to include all uninventoried roadless areas. Others believe that the Forest Service should adopt Alternative 4DT4. One constituent requests that a modified version of Alternative 4DT4 be implemented, "without loopholes that would inevitably lead to the building of roads and their use for extractive or commercial activity."

Public Concern: The Forest Service should adopt Alternative 4.

I am writing to strongly encourage you to back alternative 4 as the best option to protect roadless areas in the national forests of this country. This is the only one of the alternatives which would provide immediate and lasting protection without loopholes, exemptions or waivers. (Individual, Los Angeles, CA - #480.64140)

I am writing in support of Alternative 4 of your proposed Roadless Policy. Only Alternative 4 acts to save our forests and, therefore, our air quality. Healthy forests are a necessity if we are to continue as a species for another seven generations. Other reasons for my support of alternative 4 include the facts that there are already 386,000 miles of national forest roads for which the Forest Service does not have the funds to maintain; logging affects watershed values and diminishes water quality; and logging in roadless areas ALWAYS loses money for taxpayers. (Individual, Columbia, CA - #912.64140)

PROHIBIT GRAZING

We prefer alternative 4 to prohibit road construction, reconstruction and all timber harvest in the unroaded areas. The elimination of grazing in roadless areas should be included. (Individual, San Diego, CA - #1147.61300)

PROHIBIT MINING, GRAZING, OFF-HIGHWAY VEHICLES, AND COMMERCIAL DEVELOPMENT

Alternative 4 is the best alternative listed, but it should also prohibit all future activities which are detrimental to the environment, including all logging, mining, grazing, ORV usage, and commercial development. Absolutely no future road-building or reconstruction should be allowed for any reason. (Individual, Richland, WA - #1006.61300)

Public Concern: The Forest Service should clarify whether Alternative 4 would allow harvest of "dead and down" trees.

Alternative 4 states that all tree cutting is prohibited except for personal use activities such as firewood gathering…Does this include "dead and down" trees? (Individual, Moses Lake, WA - #718.6400)

Public Concern: The Forest Service should adopt Alternative 4A.

There should be no new roads constructed or reconstructed in "roadless" areas and no procedures established for this non-action. JUST DON'T BUILD OR RECONSTRUCT ROADS IN ROADLESS AREAS. (Individual, Bridgeton, ME - #836.64140)

Public Concern: The Forest Service should adopt Alternative 4B.

I implore the Forest Service to adopt a modified alternative--4b which would prohibit roadbuilding and commercial logging in roadless areas. (Individual, Missoula, MT - #824.61300)

Public Concern: The Forest Service should adopt Alternative 4D.

A healthy final policy must halt logging, road building and similar destructive activities in ALL our national forests. Please reinforce alternatives 4 (including the Tongass National Forest) and D to prohibit all destructive activities in all roadless areas larger than 1,000 acres. Your recommendations carry a heavy burden of responsibility, yet the choice is clear. [At least] change your recommendation so that our forest lands will not only live but thrive. (Individual, No Address - #213.61310)

Public Concern: The Forest Service should adopt a modified version of Alternative 4D.

I urge you to adopt alternative 4D with the following modification: Allow no new road building in any unroaded area of any national forest. (Individual, Boulder, CO - #334.61310)

Count my vote FOR ALTERNATIVE 4D and for its expansion to cover ALL roadless areas of any size, and to protect wilderness proposed lands from road building until the NEPA is voted on. (Individual, Mundelein, IL - #1694.61300)

Also create a moratorium on destructive activities in unroaded areas pending local forest plan revisions. I support strengthened versions of alternative 4 (including the Tongass National Forest) and D to prohibit all destructive activities in all roadless areas larger than 1000 acres. (Individual, Burbank, CA - #398.61310)

Please issue a final policy that will provide lasting and immediate protection for all national forest roadless areas without loopholes, exemptions or waivers. The final policy should permanently halt logging, road building, OHV use and other destructive activities in all roadless areas in all national forests. This policy should also create a moratorium on logging, road building and other destructive activities in unroaded areas pending local forest plan revisions. As such, I support strengthened versions of alternative 4 (including the Tongass National Forest in Alaska) and D to prohibit all destructive activities in all roadless areas larger than 1000 acres. (Individual, La Jolla, CA - #673.61310)

I am writing concerning the Roadless Proposal DEIS and want it made clear that I am wholly in support of a modified version of Alternative 4D. While alternative 4D would prohibit road construction, reconstruction and all commercial logging within unroaded portions of inventoried roadless areas, I would like this alternative to be expanded to protect ALL inventoried and uninventoried roadless areas regardless of size (including those in Alaska's Tongass National Forest) and to additionally maintain the wilderness values of roadless lands proposed by Congress for wilderness designation, including roadless areas encompassed in the Northern Rockies Ecosystem Protection Act, H.R. 488, which now has 100 cosponsors. Also prohibited should be mining and motorized use in all roadless areas. (Individual, Hamilton, MT - #781.61310)

Public Concern: The Forest Service should adopt a modified version of Alternative 4DT3.

I strongly urge you to adopt a modified version of Alternative 4DT3. We must immediately fully protect all inventoried and uninventoried Roadless lands: protection must be made before forest plans are written. Include the Tongass National Forest. No ORV use. (Individual, Hamilton, MT - #7826.61300)

Public Concern: The Forest Service should adopt Alternative 4DT4.

I feel 4DT4 is a better alternative. Our Roadless Areas need to be protected from timber harvesting, ORV use, mining, gas and oil development to ensure their existence for future generations. (Individual, Bozeman, MT - #3597.61310)

Public Concern: The Forest Service should adopt a modified version of Alternative 4DT4.

As a biologist, I am very concerned that our last remaining roadless areas remain roadless. Their importance for watersheds, for native species, as connectivity corridors, and as areas for peaceful, low impact recreation make it imperative that we protect them completely, without loopholes that would inevitably lead to the building of roads and their use for extractive or commercial activity, and ORVs. THEREFORE I STRONGLY URGE YOU TO CHOOSE ALTERNATIVE 4-D-T4, WITH MODIFICATIONS TO PREVENT THE USES AND ABUSES MENTIONED ABOVE. (Individual, Ashland, OR - #8297.83000)

4.5 Procedural Alternatives

This section addresses comments regarding the procedural alternatives of the Draft EIS. How the proposed rule will be implemented elicits numerous comments from the public. Some respondents believe that the Draft EIS should list the actual procedures to be implemented.

"Without the actual procedures for the public to evaluate, the DEIS is incomplete and cannot be approved," one person maintains. Similarly, a business representative expresses concern with the criteria to be used to designate future roadless areas. This individual believes the criteria are extremely vague and need to be clarified in future documents.

While acknowledging that project and planning level analysis must by their nature be done at the local forest level, one environmental organization believes that the proposed rule's forest and project level planning procedures should reflect the need for consistency and provide parameters and standards to guide local decision makers. Another individual, also concerned with local level planning procedures, requests that the Forest Service ensure that local participation is not dominated by economics.

One State Elected Official contends that the Forest Service should more thoroughly analyze the Procedural Alternatives. He points out that the Draft EIS contains only three pages of analysis related to the Procedural Alternatives.

The section is divided into four subsections corresponding to the four procedural alternatives discussed in the Draft EIS. The Subsections are titled: 4.5.1, Alternative A; 4.5.2, Alternative B; 4.5.3, Alternative C and 4.5.4, Alternative D.

Public Concern: The Draft EIS should list the actual procedures to be implemented.

The DEIS states procedures are "established forms or methods." Well, where are they? I have diligently searched the DEIS and can find no procedures. There is a bulleted list of topics to consider, but this is neither form nor method. The DEIS provides no hint as to how these items are to be weighted, how fundamental conflicts are to be resolved, etc., which is important. The DEIS covers actions by which the Procedural Alternatives are to be implemented, so the procedures to be enacted must be in it. Without the actual procedures for the public to evaluate, the DEIS is incomplete and cannot be approved. (Individual, Fort Collins, CO - #19429.64200)

Public Concern: The Forest Service should clarify the criteria to be used to designate future roadless areas.

The most alarming part of the proposal is the procedural alternatives section. It includes procedures to designate, as roadless, other forest lands that are currently not included in inventoried roadless areas. This proposal would allow any part of any forest, no matter how small, to be included in the roadless inventory. The criteria to be considered when determining these future roadless areas are extremely vague. This document offers no description of these lands. This vagueness is unacceptable. (Business, Lewiston, ID - #14715.63000)

The presence of past timber sales should not disqualify areas for Roadless Area designation. While this diminishes RA values at present, this will change over time. (Environmental/Preservation Organization, Lake City, FL - #28999.64420)

Public Concern: The proposed rule's forest and project level planning procedures should reflect the need for consistency and provide parameters and standards to guide local decision makers.

The procedures governing the management of roadless areas at the project and forest plan level provide little or no guideline or parameter for decision makers and forest planners regarding the protection and future of roadless and unroaded areas. For example the DEIS states that "local managers would evaluate whether and how to protect roadless characteristics project by project" and "local officials" discretionary decisions would be informed by their evaluation of the quality and importance of the characteristics and determine whether these characteristics should be protected. While project and planning level analysis must by their nature be done at the local forest level, national forest roadless areas are a part of all Americans priceless and irreplaceable natural heritage. The roadless area conservation rule's forest and project level planning procedures should reflect the need for consistency and provide parameters and/or standards to guide local decision makers. This is critically important. (Environmental/Preservation Organization, Cave Junction, OR - #16188.64200)

Public Concern: The Forest Service should ensure that under the procedural alternatives local participation is not dominated by economics.

Under procedural alternatives, please ensure that local participation isn't dominated by economics. Let's start leaving forest land in a forest condition. (Individual, Diamondville, WY - #1309.64200)

Public Concern: The Forest Service should more thoroughly analyze the Procedural Alternatives.

Second, the DEIS inadequately addresses the 'procedural alternatives". Over 300 pages in the DEIS are dedicated to the "prohibition alternatives", but only three pages are spent on procedural alternatives. Yet, the overall impact of the procedural alternatives may well be greater than that of the prohibition alternatives particularly if the recent Road Management Strategy results in more unroaded areas subject to the procedural alternatives. (State Elected Official, Boise, ID - #13571.64200)

4.5.1 Alternative A

Citing the lack of an adequate range of alternatives, many respondents maintain that the Forest Service should adopt Alternative A.

Public Concern: The Forest Service should adopt Alternative A.

I ask you to develop and evaluate one or more alternatives that would allow multiple use road access in specific roadless areas threatened by insects, disease or fire. If the Forest Service will not prepare an additional alternative as mentioned above, the only alternative I can support is Alternative A—the No Action Alternative. (Individual, Missoula, MT - #50742.60000)

The only reasonable alternative, I feel, is Alternative A, "no action". (Individual, Waukesha, WI - #17356.61100)

4.5.2 Alternative B

While some respondents support the implementation of Procedural Alternative B, others believe the Forest Service should not adopt this alternative. "Leaving the decision to local managers for 'roadless' areas outside of 'inventoried roadless areas' guarantees an inconsistent approach and the loss of many high value areas," according to one person.
Citing a similar concern, one Montana resident supports Alternative B but expresses reservations about the level of authority invested in local managers, who are subject to local user group pressure.

Public Concern: The Forest Service should implement Procedural Alternative B.

I would prefer a rule that would direct local Forest Service managers to evaluate each roadless area whether and how to protect roadless characteristics and values in the context of multiple-use management during forest plan revisions. (Individual, McMinnville, OR - #3401.41240)

Public Concern: The Forest Service should not adopt Procedural Alternative B.

I am very disappointed in Part B of the proposal. Leaving the decision to local managers for "roadless" areas outside of "inventoried roadless areas" guarantees an inconsistent approach and the loss of many high value areas. There is an obvious need to identify important areas before decisions can be made. (Individual, Moscow, ID - #1782.64220)

Public Concern: Under Procedural Alternative B the Forest Service should limit the authority of local managers to protect roadless areas from local user group pressures.

On Procedural alternatives I support B, but would limit authority of local managers to protect roadless areas from local user group pressures. (Individual, Clinton, MT - #817.64220)

4.5.3 Alternative C

Many respondents believe that the Forest Service should evaluate new road proposals on a case-by-case basis. Therefore, they support Procedural Alternative C.

Public Concern: The Forest Service should implement Procedural Alternative C.

I…urge the Forest Service to prohibit all roads and other destructive activities in these last remaining stands, providing interim protection through project by project analysis. And I also urge that consideration include the Tongass National Forest in Alaska, the only largely intact rain forest left in the world's temperate zones. (Individual, Concord, CA - #908.61300)

I am hesitant to endorse a blanket "no new roads policy," as this might do more harm than good! I suggest sound forest resources management and evaluate new road proposals on a case-by-case basis, rather than rigid policies that may straight-jacket future actions. (Individual, Santa Barbara, CA - #314.64250)

4.5.4 Alternative D

"I am concerned that while the rule may be adopted, without an interim policy of project-by-project analysis the policy may not be implemented for years," remarks one individual. Another person notes that a project-by-project analysis of projects in a transition to the forest plan process "provides the lowest risk of loss of roadless characteristics and values of all the alternatives." For these reasons, these respondents support Procedural Alternative D.

Public Concern: The Forest Service should adopt Procedural Alternative D.

I am concerned that while the rule may be adopted, without an interim policy of project-by-project analysis the policy may not be implemented for years. Remember that Congress has delayed the revision of many Forest Plans for years. Additionally, a large-scale management plan via Forest Plan amendments is necessary to provide a consistent environment for plants and animals. Discontinuous and disrupted management of the unroaded areas could inhibit the recovery and sustainability of many endangered and threatened species. With these arguments in mind I recommend the selection of Alternative D. (Individual, Rowlett, TX - #954.64240)

I am appalled at the prospect of the government adopting policies for the roadless areas which do NOT provide for other areas not yet possessing roads to use a project-by-project analysis in a transition to the forest plan process. (Individual, Middletown, CT - #215.64240)

I support procedural alternative D because it provides the lowest risk of loss of roadless characteristics and values of all the alternatives. (Individual, Bozeman, MT - #8319.90200)

4.6 Tongass Alternatives

Exempting the Tongass National Forest from the proposed rule motivates many respondent's comments. General concerns regarding the Tongass National Forest are analyzed in this section. Several respondents request that the Forest Service provide the scientific justification for excluding the Tongass National Forest from the proposed rule. "Excluding the Tongass would severely compromise the scientific legitimacy of any national policy on the protection of roadless areas in our national forest system," ventures one person. On the contrary, others believe that "the decision to defer action on the Tongass National Forest is just."

Many Alaska residents urge the Forest Service to protect the Tongass National Forest from the timber industry. Similarly, residents exhort the agency to prohibit road building in the Tongass National Forest. Conversely, others request that road construction be allowed in the Tongass to facilitate access to remote areas.

Agreeing with those who wish to preserve the Tongass National Forest, some respondents request that at least half of the inventoried roadless areas in the Tongass National Forest be protected from road construction and timber harvest. Others have more specific suggestions. One citizen suggests that the proposed rule include all Tongass National Forest inventoried roadless areas over 25,000 acres, especially those adjacent to wilderness areas and national parks. Also wishing to protect the Tongass, another respondent asks that the Forest Service impose a 50-year moratorium on activities in Tongass National Forest roadless areas.

Some respondents are dissatisfied and frustrated with the exemption of the Tongass from the proposed rule. They believe that the Forest Service should not wait four years to realize that there are sufficient roads to meet timber, recreational and subsistence access needs in the Tongass National Forest. Citing the fact that Alaska was bought with the tax money of all Americans, one Alaskan asks that the Forest Service treat the Tongass National Forest as an equal share of America's National Forest legacy and not as a special case. Yet another individual believes that the Tongass should be considered a North American Natural Heritage Area. However, other Alaskans, unconcerned with the Tongass National Forest's exemption, feel that the Forest Service should implement and evaluate the Tongass Land Management Plan.

Public concerns specifically addressing the Tongass Alternatives can be found in the subsections immediately following this section; Subsections are titled: 4.6.1, Alternative T1; 4.6.2, Alternative T2; 4.6.3, Alternative T3; and 4.6.4, Alternative T4.

Public Concern: The Forest Service should provide the scientific basis for excluding the Tongass National Forest from the proposed rule.

There is no scientific basis to exclude roadless areas of the Tongass National Forest from the proposed protections. Excluding the Tongass would severely compromise the scientific legitimacy of any national policy on the protection of roadless areas in our national forest system. (Individual, Millersville, PA - #114.64330)

Public Concern: The Forest Service should defer action on the Tongass National Forest.

The Tongass National Forest is a very valuable piece of real estate, both with regards to the natural environment and to timber. This forest has been subject to abuses in the past, and some claim that these abuses are continuing in defiance of recent legislation. Most of the roadless areas should be closed to road building, but there should be a significant amount still left for environmentally-sensible timber harvesting. The web site indicates that most of the roadless areas (76%) in Tongass are now closed to road building, which is much higher than in most national forests. Although a lot of these areas are rock and ice, it appears that at least half are in forest. Only 10% of Tongass has been developed with roads, compared to 30-70% of other national forests in the West, and 40% is wilderness, more than any other national forest as far as I am aware. Therefore, the decision to defer action on the Tongass National Forest is justified. (Individual, Providence, UT - #4016.64330)

Public Concern: The proposed rule should protect the Tongass National Forest from the timber industry.

Do not cave in to pressure from our states dinosaur Congressional delegation. They would like to be back in the heyday of the Tongass timber program when the government worked for the industry. Times have changed. Please do not give away our last remnant of the western temperate rainforest to a minority industry. (Individual, Haines, AK - #7626.41300)

Public Concern: The Forest Service should prohibit road building on the Tongass National Forest.

I feel that because there are already 4650 miles & 13 million board feet of logging roads in the Tongass, that creates adequate road access to timber. (Individual, Juneau, AK - #6816.71300)

There are sufficient roads in the Tongass to meet any realistic timber needs. There are sufficient roads to meet any recreational or subsistence needs. But there is no need to wait for four more years to recognize these facts. (Individual, Tenakee Springs, AK - #8123.71300)

Public Concern: The Forest Service should allow road construction on the Tongass National Forest.

I am in full support of keeping and allowing construction of new roads on the Tongass National Forest lands. These roads have allowed my family and friends access to remote areas that would otherwise be of great difficulty reaching. (Individual, Sitka, AK - #2146.71300)

Public Concern: The Forest Service should protect at least half of the inventoried roadless areas in the Tongass National Forest.

A target should be set as to how much of the Tongass' Inventoried Roadless Areas will be protected. I feel that at least half should receive long term protection based on the configuration of existing protected areas and other conservation biology concepts. (Individual, Leavenworth, WA - #15897.64355)

Public Concern: The Forest Service should include all inventoried roadless areas over 25,000 acres and adjacent to wilderness areas in the Tongass National Forest.

The largest blocks [(>25,000 acres)] [of the Tongass IRA's] should receive certain protection in any case, especially when adjacent to existing wilderness or National Park lands. (Individual, Leavenworth, WA - #15897.71120)

Public Concern: The Forest Service should consider a 50 year moratorium on activities in roadless areas of the Tongass National Forest.

It is my professional opinion as an engineer/forester that a 50 year moratorium be effected on the Tongass National Forest that restrict further incursion into the remaining "roadless areas" or, until such time that industry gears up for and begins the harvest of the emerging second growth on previously logged lands. This second growth is approximately 50 years old or less and far from millable size. (Individual, Sitka, AK - #11389.10100)

Public Concern: The Forest Service should not wait four years to realize that there are sufficient roads to meet timber, recreational and subsistence access needs in the Tongass National Forest.

There are sufficient roads in the Tongass to meet any realistic timber needs. There are sufficient roads to meet any recreational or subsistence needs. But there is no need to wait for four more years to recognize these facts. (Individual, Juneau, AK - #6816.71300)

Do not delay in including the Tongass National Forest in your Roadless Area Protection. About two thirds of the total projected timber harvest planned in the Tongass over the next five years is projected to come from inventoried roadless areas. This is directly counter to the mission of protecting the few remaining roadless areas we have left. (Environmental/Preservation Organization, Oak Ridge, TN - #18498.64351)

Public Concern: The Forest Service should treat the Tongass National Forest as an equal share of America's National Forest legacy.

As an Alaska state resident, I am extremely disturbed by the threats of cutting agency funding that our Congressional delegation promises to impose should policy not go their way. What our delegation fails to grasp is that Alaska was bought and paid for by the American taxpayers. Their time will pass, but your actions have a direct and lasting affect on the health and management of our National Forests. The Tongass should be treated as an equal share of America's National Forest legacy and not as a special case. (Individual, Juneau, AK - #6117.93620)

Public Concern: The Tongass should be considered a North American Natural Heritage Area.

[The Tongass] should be considered as a NORTH AMERICAN NATURAL HERITAGE AREA. (Individual, Santa Clara, CA - #550.64410)

Public Concern: The Forest Service should implement and evaluate the Tongass Land Management Plan.

The Forest Service issued the FEIS for the Tongass Land Management Plan in 1997. The ink was barely dry on the document when environmental groups began clamoring to amend the plan. One of the plan amendments is this roadless proposal. In 1997 TLMP represented the best use and allocation of the Tongass National Forest resources. I am in favor of implementing TLMP, and then evaluating the effects of implementation on the forest. (Individual, Ketchikan, AK - #6655.72230)

4.6.1 Alternative T1

Economic hardship, brought about by the withdrawal of land from timber harvest, is the reason most often cited by those who support the adoption of Alternative T1. Special legislation directed at the Tongass National Forest is also cited. “A considerable amount of the Tongass National Forest was given special designation by past legislation and executive orders,” one respondent indicates. “Enough is enough.”

Public Concern: The Forest Service should adopt Alternative T1.

Alternative T1 is the most logical and is favored. A considerable amount of the Tongass National Forest was given special designation by past legislation and executive orders. Enough is enough. Let uses be determined by the current land use plan and future revisions thereto without a total new plan. Good decisions have been made. Stay with them in spite of preservationist displeasure. (Individual, Pueblo, CO - #2884.64310)

There is room for industry and for wilderness on the Tongass. Since 1995, Ketchikan has lost 1,000 jobs as a direct or indirect result of the mill closure--brought about by the withdrawal of land for logging. The impact is devastating

on this once bustling community. School enrollment has dropped, resulting in less money for education. The low-paying tourism jobs cannot replace those lost, and the constant influx of visitors takes its toll on our infrastructure. The negative economic ripple is felt by all the businesses in town--doctors, lawyers, realtors, floatplane operators, drug stores, grocery stores, clothing stores, insurance companies, restaurants. This list goes on and on. I do not believe the law (TTRA, ANILCA & TLMP) or science justify or support extending the roadless ban to the Tongass. But this isn't about justice. This is about people who want to "save" Alaska and transform it into the First Park. The reason the environmentalists are so successful is not because the law or science is on their side, it's because as Donald Ross of the Rockefeller Family Fund said in "Tongass: Pulp Politics and the Fight for the Alaska Rain Forest" (page 172): "It doesn't take much, when you're a congressman from Kansas and you've never heard of the Tongass, to get you to vote for trees." Don't be like the congressman from Kansas. (Individual, Ketchikan, AK - #6972.90000)

4.6.2. Alternative T2

While some respondents support the implementation of Alternative T2, none of them state their reasons for such a decision, much to the chagrin of Forest Service analysts.

Public Concern: The Forest Service should adopt Alternative T2.

With regards to the Tongass National Forest in Alaska, I would choose T2. (Individual, Duluth, MN - #3214.64320)

4.6.3 Alternative T3

Believing that Alternative T3 is "too big a compromise," some respondents ask that the Forest Service not adopt this alternative.

Public Concern: The Forest Service should not adopt Alternative T3.

Option T-3 is too big a compromise. (Individual, Pueblo, CO - #605.64330)

Alternative T3 is not acceptable. (Individual, Richland, WA - #1006.64330)

4.6.4 Alternative T4

The reasons people offer for championing the implementation of Alternative T4 are as varied as the respondents themselves. One political organization representative believes that the extensive national public process afforded the proposed rule should be made available to the Tongass National Forest. "On issues of this magnitude," writes this representative, "all Americans deserve the ability to comment on all their public lands."

"All of southeast Alaska is extensively 'roaded' by the inland waterways," offers one Alaskan. "Roads are an expensive and destructive redundancy that reflects poorly on USDA management and science." Professing that there have been no studies that demonstrate a demand for more

roaded recreation, an Alaskan business representative also questions the need for more roads in the Tongass.

Numerous proponents of Alternative T4 express concern with the level of local control afforded Tongass National Forest managers. "Even if Tongass decision-makers have the inclination to protect roadless areas," one respondent remarks, "they may be unable to do so in the social, economic, and political climate in which they live and work."

The protection of wildlife habitat is often cited as a reason for the adoption of Alternative T4. "Wild salmon, brown bears, wolves, eagles and many other creatures depend upon a healthy intact habitat for survival," attests one respondent. Taking this argument one step further, another individual declares that "we do not have the right to be destroying irreplaceable habitat nor do we have the right to interfere with the evolutionary process. The Tongass may be the last place on earth where species, thousands and thousands of plants and animals, are allowed to evolve without human interference."

Although one respondent does not specifically support Alternative T4, this individual does request that the Forest Service phase out logging and road building in the Tongass National Forest within ten years.

Public Concern: The Forest Service should adopt Alternative T4.

T4 looks like the most immediate and thus the most productive. The forest needs this protection now, why wait for four years? Without intervention things are not going to improve on their own and who knows what could happen within the four years to the forest. (Individual, No Address - #328.64340)

The Tongass alternative should be T4; we need to bring this forest in line with all the other forests in the West. (Individual, Colorado Springs, CO - #854.64340)

The extensive national public process afforded this rule making must be available to the Tongass, rather than the local, public process planned under Alternative T3 when the 5-year Tongass Land and Resource Management Plan is reviewed. On issues of this magnitude, all Americans deserve the ability to comment on all their public lands. (Civic Organization, Missoula, MT - #10757.41500)

I want to strongly support the USFS proposal that would prohibit new road construction or reconstruction in unroaded portions of inventoried roadless areas. I also wish to recommend the adoption of these same management restrictions on the Tongass National Forest when its 5-year plan is proposed. (Individual, Vernal, UT - #1561.61200)

INLAND WATERWAYS

All of southeast Alaska is extensively "roaded" by the inland waterways. Roads are an expensive and destructive redundancy that reflects poorly on USDA management and science. (Individual, Tenakee Springs, AK - #11371.71300)

RECREATION

In addition to the backlog of Tongass roads that need repair, I fail to see any demand for more roaded recreation given the over 4500 miles on the Tongass, enough to span the width of the United States 1½ times. In fact, there

have been no studies that demonstrate a demand for more roaded recreation. (Business, Petersburg, AK - #11406.10212)

LOCAL DECISION-MAKERS

Decision-makers for the Tongass National Forest are infamous in their resistance to strong protection for roadless areas. This hostility to roadless area protection is evidenced by the forest plan revision for the Tongass, which selfishly recommends no additional wilderness for any of its 9.4 million acres of roadless lands. Even if Tongass decision-makers have the inclination to protect roadless areas, they may be unable to do so in the social, economic and political climate, in which they live and work. If roadless areas are to be protected in the Tongass, local decision-makers should be insulated from the fallout of that decision and so the decision should be made NOW, at the national level, along with every other national forest. (Individual, Seattle, WA - #10687.41000)

I am skeptical of the [Forest] Service's rationale in postponing decisions regarding smaller roadless areas and the entire Tongass National Forest and in putting these decisions into often-hostile local hands. (Individual, Seattle, WA - #10687.42000)

WILDLIFE HABITAT

Wild salmon, brown bears, wolves, eagles and many other creatures depend upon a healthy intact habitat for survival. The current proposal fails to ensure anything will ever happen to protect the Tongass and its majestic wildlife-2004 is too late! (Individual, Anchorage, AK - #5401.83500)

Keep what wild habitat remains on Mitkof Island and other islands in the Southeast Alaska intact. (Individual, Petersburg, AK - #11822.83500)

The Forest Service should address the effects of habitat fragmentation and development on the brown/grizzly bear. (Individual, Anchorage, AK - #11350.83500)

These roadless reserves are especially critical because only four percent of the Tongass land base encompasses the low elevation, large old growth most important to fish and wildlife and much of this rare forest has already been clearcut. (Individual, Missoula, MT - #10034.83610)

EVOLUTION

We do not have the right to be destroying irreplaceable habitat nor do we have the right to interfere with the evolutionary process. The Tongass may be the last place on earth where species, thousands and thousands of plants and animals are allowed to evolve without human interference. Protect the Tongass NOW. (Individual, Chopper Hill, VA - #9476.83500)

Public Concern: The Forest Service should phase out timber harvesting and road building in the Tongass National Forest within ten years.

Logging and roadbuilding should be phased out to zero within 10 years in the Tongass. (Individual, Helena, MT - #9126.61300)

4.7 Alternatives Considered but Eliminated

Page 2-20 of the Draft EIS states: “Alternative duration options were not considered as fulfilling the purpose and need for the long-term protection of roadless areas. . . . the effects of any temporary prohibition alternative would result in little difference, in the short-term, from the effects of the proposed Road Management Rule and would be duplicative.” Nonetheless, many

respondents request that the Forest Service cease all proposed or planned logging operations in roadless and unroaded areas pending revision of forest plans. Similarly, others ask that the Forest Service halt any currently planned road construction projects in roadless areas until a final decision is made. Conversely, some individuals believe that the Forest Service should continue current plans for logging, road construction, and trail building until new forest plans are adopted.

Public Concern: The Forest Service should cease all proposed or planned timber harvest operations in roadless and unroaded areas pending revision of forest plans.

I…urge you to cease all planned or to-be-planned logging operations in roadless and unroaded areas until a revised forest plan is decided. (Individual, Eugene, OR - #545.64251)

Public Concern: The Forest Service should not proceed with any currently planned road construction projects in roadless areas until the final decision is made.

I do not know the time line of the decision making process but would hope that currently planned road construction projects in all the roadless areas not proceed until the final decision is made. It would be a shame if de facto reduction of the areas currently unroaded occurred while the decision making process was ongoing. (Individual, Olympia, WA - #1649.72200)

Public Concern: The Forest Service should continue current plans for timber harvest, road construction, and trail building until new forest plans are adopted.

The Sierra Club is requesting a moratorium on logging and roadbuilding in uninventoried, unroaded areas pending local forest plan revision. This is absolutely ridiculous. A moratorium will effectively support their long-term goals at the expense of the loggers' livelihood and forest access for other recreational users. This is hardly a fair solution to all forest users. This is just as silly a request, as it would be if the OHV users and loggers asked the Forest Service to remove all usage and access restrictions until the forest plan is revised. Current logging agreements and current road building and trail building plans, as well as future plans under today's requirements should continue until a new forest plan is adopted. (Recreational Organization, New Kensington, PA - #2253.64252)

4.8 Additional Areas to be Included in the Proposed Rule

Many proponents of the proposed rule suggest additional areas and designations they believe should be included in the proposed rule. At the bare minimum, some respondents maintain that the Final EIS should include all the roadless areas that were contained in the Draft EIS. Citing the Northern Plains Grasslands Management Plans Revision, one conservation organization exhorts the Forest Service not to eliminate any inventoried roadless areas on the National Grasslands. In addition to grasslands, the Forest Service should include Wilderness Study Areas in roadless area inventories, according to another environmental group.

The exclusion of uninventoried roadless areas elicits many responses from the public. The reasons people offer for protecting uninventoried roadless areas are numerous and varied.

Because many uninventoried roadless areas are adjacent to inventoried roadless areas and wilderness areas, it is important that they be afforded the same protections as inventoried lands, one individual advances. Uninventoried roadless areas provide the same values as inventoried areas and therefore should be included in the proposed rule, according to some.

Other proponents of uninventoried roadless area inclusion suggest that the Forest Service "mandate follow-up planning that identifies and protects uninventoried roadless areas and permanently ends damage to both inventoried and uninventoried areas from mining, off-road motorized vehicles, and other harmful activities." Still others wish to expand the proposed rule to include the roaded areas identified as part of the national forest roadless areas.

The Forest Service should designate roadless areas based on their biological value, not on their roaded status, according to numerous individuals. Of these respondents, some request that the Forest Service protect all biologically significant areas, regardless of their size. The size of a biologically significant roadless area is of no consequence if endangered species are involved, according to others. "Many disappearing species are confined to forest habitats much smaller than 5,000 acres, some to less than 1,000 acres," ventures one such person. "We need a better Roadless Area Conservation Rule to protect these rare species from abuse and possible extinction."

The reader should note that comments regarding the inclusion of specific geographic areas are contained in Appendix B. Comments regarding the size limitations are found in Subsection 4.8.1, Size Limitations of Roadless Areas.

Public Concern: The Final EIS should include all roadless areas that were included in the Draft EIS.

In addition, staff members from the Buffalo Gap National Grasslands have indicated that the Forest intends to drop all of the user-identified roadless areas from the draft EIS for the Northern Plains Grasslands Management Plans Revisions in the Final RAC EIS. These areas were distinguished from the agency-identified areas only by internal fencing claims. Such claims are not relevant to the current Roadless Area Conservation rulemaking, and should not be used to eliminate any inventoried roadless areas on the National Grasslands on the Northern Plains. All roadless areas included in the draft Roadless Area Conservation EIS must also be included in the Final EIS. (Environmental/Preservation Organization, Rapid City, SD - #10681.41200)

Public Concern: The Forest Service should include Wilderness Study Areas in roadless area inventories.

Therefore, failing to include WSAs in the roadless area inventories will leave these areas vulnerable to roading and other destructive activities should they lose their status and be "released" by Congress. The Forest Service must clarify in the final rule whether or not these areas are included within the inventory. API recommends that these pristine areas be afforded the same prohibition and procedural protections for unroaded inventoried roadless areas. (Environmental/Preservation Organization, Sacramento, CA - #15906.64411)

Public Concern: The Forest Service should protect all remaining univentoried roadless areas.

Protect immediately all remaining roadless areas, including non-inventoried areas and areas of 500 to 5,000 acres. Uninventoried areas must be included because so much land has been acquired since the inventory was done about 20 years ago. (Individual, Cumberland, MD - #3564.60000)

Because many uninventoried roadless areas are adjacent to inventoried roadless areas and wilderness areas, it is important that they be afforded the same protections. (Individual, Helena, MT - #1303.64150)

The policy should further include areas that in the past have not been inventoried as roadless. Illinois has only one plot of national forest over 5000 acres (Burke Branch). There are two more forests that are classified as Wilderness: Camp Hutchins and Ripple Hollow. There are also many small plots with wilderness terrain that are attached to these forests. (Individual, Chicago, IL - #3296.64421)

UNINVENTORIED ROADLESS AREAS PROVIDE THE SAME VALUES AS INVENTORIED AREAS

The uninventoried roadless forest areas are not considered in the DEIS but should be included and protected through the forest planning process as they provide the same values as the inventoried areas. (Environmental/Preservation Organization, Pensacola, FL - #15041.71110)

MANDATE FOLLOW-UP PLANNING

Mandate follow-up planning that identifies and protects uninventoried roadless areas and permanently end damage to both inventoried and uninventoried areas from mining, off-road motorized vehicles, and other harmful activities. (Individual, No Address - #301.64150)

Follow-up planning should be mandated to protect all uninventoried roadless areas from mining, logging, off-road vehicles, and ski developments. (Individual, Philomath, OR - #767.64250)

Public Concern: The Forest Service should include the roaded areas identified as part of the national forest roadless areas in the proposed rule.

The rule should include all of the inventoried roadless areas, which would also ban ADDITIONAL road building in those portions of the inventoried roadless areas that have been roaded (yellow in the power point presentation). If the roaded portions are still identified as part of the roadless area on national forests, then they ought to be included in the proposed rule for no more road building. It makes sense to include them and either ban additional road building in those areas, or make an effort to reduce the number of roads in those areas, because they are in a designated roadless area. If they are not included in the proposed rule and are considered roaded, then perhaps they should be removed from the areas being identified as inventoried ROADLESS areas. (Individual, Prairie City, OR - #953.64150)

Public Concern: The Forest Service should designate roadless areas based on their biological value, not on their roaded status.

Ideally, the FS should choose its designated roadless areas based on their biological value, and not based solely on what is currently left without any existing road. These decisions should have been made years ago by the FS and Congress, but I realize the political nature of this issue. It would be nice, however, if all areas for roadless designation were chosen because of the non-timber values within the specific roadless areas. (Individual, Coeur D'Alene, ID - #2121.64420)

PROTECT BIOLOGICALLY SIGNIFICANT AREAS OF ANY SIZE

End all logging and destructive practices in roadless areas of 1000 acres or more and in smaller areas of special biological importance. (Individual, Rockville, MD - #1021.64400)

Such [protective] measures should apply at a minimum to (1) all roadless lands that are 1000 acres in size and adjacent to other unroaded areas of 5000 acres or more, and (2) any roadless areas with special ecological significance. (Individual, Atlanta, GA - #117.64420)

I believe the 5000 acre designation is the only practical option at this time and so I support this option. However, 5000 acres is not a scientific decision or even a rational decision. It is based on studies performed in the past for a different purpose. Its use here is one of convenience. I would like to see scientific data on what size is the optimum size from a habitat preservation point of view. It is my contention that different environments will require different size allocations to make optimal habitat preservation. In desert regions 5000 acres may be insufficient to make a difference and in coastal marsh 10 acres may be significant. It would be best to designate roadless areas based on the needs of the environment and not an arbitrary designation. (Individual, Albuquerque, NM - #5771.64423)

PROTECT SPECIES FROM EXTINCTION

Many disappearing species are confined to forest habitats much smaller than 5,000 acres, some to less than 1,000 acres. Roads through these habitat areas can lead to species' extinctions. In Southern Arizona we enjoy the 1.7-million-acre Coronado National Forest, a unique managed area of 13 “sky island” mountain ranges. The Coronado is home to more than 140 animals and plants already classified as sensitive, threatened or endangered. We need a better Roadless Area Conservation Rule to protect these rare species from abuse and possible extinction. (Individual, Tucson, AZ - #9915.83520)

4.8.1 Size Limitations on Roadless Areas

Page 2-19 of the Draft EIS states: “Although alternative size criteria were suggested . . . the size of a roadless area is not necessarily related to how it functions in conserving the characteristics associated with roadless areas. . . . The appropriate size of a roadless area necessary for protecting roadless values is greatly dependent on its context or relationship to lands surrounding it. Therefore, minimum or maximum size criteria were not deemed appropriate as components of the procedural alternatives.” Nonetheless, a plethora of respondents assert that the Forest Service should protect all roadless areas regardless of size. “The burden of proof should be on those contending that roads should be allowed in those smaller areas,” according to one such person.

A surfeit of alternative size requirements for roadless area inclusion is offered by the public. According to numerous respondents, the Forest Service should protect all roadless areas of the following sizes: 10 acres, 50 acres, 160 acres, 200 acres, 300 acres, 400 acres, 500 acres, 639 acres, 640 acres, 1000 acres, and 2000 acres. “The 5000 acre [requirement] is a ridiculously high cut-off point and would exclude millions of acres of unroaded forest lands from permanent protection,” one citizen attests.

Other respondents link the size requirement of roadless areas with geographic location. One such individual, noting the dearth of large roadless areas in the eastern United States, suggests that the Forest Service include all roadless areas larger than 1000 acres east of the Mississippi River. Citing similar reasons, another respondent requests that the Forest Service protect all roadless areas larger than 2500 acres in the eastern United States.

The designation of lands juxtaposed to current roadless areas should be taken into consideration when deciding which areas to include in the proposed rule, according to other constituents. The Forest Service should "extend the initiative to roadless areas of 1000 acres or more that are within 10 miles of another roadless area or a national park," contends an individual.

The Forest Service should justify its choice of 5000 acres as the minimum size for roadless areas, according to many people. "The Forest Service arbitrarily chose the 5000 acres figure and with this decision eliminated most RAs [roadless areas] or potential RAs from the east," claims one environmental group. Citing concerns similar to aforementioned public concerns, another respondent decries the 5000-acre size requirement as biased against eastern forests. "Our remaining roadless areas deserve protection and are just as important--if not more so because of their rarity--than the larger areas in western states," espouses one Vermont resident. "Please revise your plan to protect our eastern roadless areas."

Public Concern: The Forest Service should protect all roadless areas regardless of size.

All roadless areas regardless of size should be included in the proposal. (Individual, Missoula, MT - #831.64423)

Every acre of inventoried roadless land should be included in the policy. The proposal only includes 1.1 million acres even though there are nearly 1.5 million acres of previously inventoried forest lands that remain unprotected. (Individual, Flagstaff, AZ - #633.64423)

Please be sure to include every acre of inventoried roadless land in the protection policy, not just those acres deemed by someone involved in drafting the policy to be "more important" than other inventoried areas. (Individual, No Address - #2426.64423)

I would like to suggest a change in the local planning process that's recommended in the environmental impact statement, so that areas between 1,000 and 5,000 acres are planned for, based on a premise that they should remain roadless. The burden of proof should be on those contending that roads should be allowed in those smaller areas. (Individual, Olympia, WA - #21119.61300)

Public Concern: The Forest Service should protect all roadless areas of 10 acres or more.

There should be NO ROADS in all roadless areas of 10 ACRES or more--not just the large roadless areas. (Individual, Albuquerque, NM - #13709.10110)

Public Concern: The Forest Service should protect all roadless areas larger than 50 acres.

I'm asking you to adopt the alternative that protects all roadless areas of 50 acres or more in all National Forests and BLM lands, whether or not the Forest Service and BLM have inventory data for them or not. (Individual, Grants Pass, OR - #6061.64420)

Public Concern: The Forest Service should protect all roadless and unroaded areas larger than 160 acres.

I urge that all inventoried roadless areas and other unroaded areas of 160 acres and larger located on the National Forest System be fully preserved as roadless areas. (Individual, Minneapolis, MN - #22.61300)

Public Concern: The Forest Service should protect all roadless and unroaded areas larger than 200 acres.

Please include roadless areas of less than 5,000 acres and end road building in areas 200 acres and larger. (Individual, Dallas, TX - #8100.61310)

Protect all individual unroaded areas 200 acres or larger and all unroaded areas 150 acres or larger that are adjacent to Wilderness Areas. (Individual, No Address - #2481.64150)

Public Concern: The Forest Service should protect all unroaded areas larger than 300 acres.

The Draft EIS should include all existing unroaded areas down to 300 acres in size. The 5000 acre (7.8 square miles) is a ridiculously high cut-off point and would exclude millions of acres of unroaded forest lands from permanent protection. (Individual, Richland, WA - #1006.64423)

Public Concern: The Forest Service should protect all roadless areas larger than 400 acres.

I would like the best protection for these areas. I encourage you to expand the roadless area conservation program. The final policy should protect all roadless areas of at least 400 acres. No exemptions should be made to this rule. ALL national forests should be included. (Individual, Eugene, OR - #762.61300)

Public Concern: The Forest Service should protect all roadless areas larger than 500 acres.

Include all national forest roadless areas larger than 500 acres. (Individual, Point Arena, CA - #518.10110)

Public Concern: The Forest Service should protect all roadless areas larger than 639 acres.

Include all National Forest roadless areas greater than 639 acres and seek out uninventoried roadless areas that have been missed during project planning activities. (Environmental/Preservation Organization, Chico, CA - #15065.64423)

Public Concern: The Forest Service should protect all roadless areas larger than 640 acres.

I urge you to prohibit road construction, reconstruction, off-road vehicle use, and commercial activities such as mining or oil and gas development on all remaining contiguous roadless areas or roadless tracts greater than 640 acres on all our National Forest System lands. (Individual, Cody, WY - #9386.64423)

Public Concern: The Forest Service should protect all inventoried and uninventoried roadless areas larger than 1000 acres.

I urge you to adopt an alternative that protects all roadless areas of at least 1000 acres in all national forests, whether the Forest Service currently has inventory data for them or not. (Individual, No Address - #301.64423)

Public Concern: The Forest Service should protect all roadless areas larger than 2000 acres.

"Based on my experience working for ten years on salmon recovery projects in Whatcom County, I am convinced that the 5000 acre threshold in the Roadless plan is inadequate. 2000 acres would be more appropriate, as would much tighter performance standards. (Individual, Bellingham, WA - #9694.10100)

Public Concern: The Forest Service should protect all roadless areas larger than 1000 acres east of the Mississippi River.

There are very few 5000-acre roadless areas in eastern forests, so set the criteria at 1000 acres east of the Mississippi River. (Individual, Westminster, SC - #7830.64423)

Public Concern: The Forest Service should protect all roadless areas larger than 2500 acres in the eastern United States.

The 5000 acre minimum is not appropriate for the east, like Vermont. This minimum should be reduced to at least 2500 acres. This would still allow a degree of isolation, but would allow more favorable lands to be entered in the roadless planning. (Individual, Bristol, VT - #14397.64351)

Public Concern: The Forest Service should protect all roadless areas of 1000 acres or more that are within 10 miles of another roadless area or a national park.

I would recommend that the Forest Service should also prohibit all motorized traffic in these areas and also extend the initiative to roadless areas of 1000 acres or more that are within 10 miles of another roadless area or a national park. (Individual, Lakeside, MT - #10239.64423)

Public Concern: The Forest Service should justify its choice of 5000 acres as the minimum size for roadless areas.

On page S-4 (and wherever else it is found in these documents), the phrase "…but are most often less than 5000 acres in size and were therefore not inventoried" is stated. The Forest Service is taking Wilderness methodology and distorting it. The Wilderness Act talks about RAs that can be less than 5000 acres if they can be managed

properly. The Forest Service arbitrarily chose the 5000 acres figure and with this decision eliminated most RAs or potential RAs from the east and from TNF. This is a biased way of conducting this analysis. We object to this unfair and arbitrary way of conducting business. (Environmental/Preservation Organization, Bellaire, TX - #13951.64423)

EASTERN FORESTS

Your protection plan for roadless areas has a gaping hole in it for eastern forests because it does not protect roadless areas of less than 5000 acres. Our remaining roadless areas deserve protection and are just as important--if not more so because of their rarity--than the larger areas in western states. Please revise your plan to protect our eastern roadless areas. (Individual, Burlington, VT - #3425.64423)

4.9 Exemptions

Many respondents discuss whether the proposed rule should contain exemptions and provisions to allow certain activities. Such concerns of a general nature are analyzed forthwith. However, comments regarding the exclusion of specific geographic areas are captured in Appendix B. Comments regarding specific activities to be exempted or prohibited are analyzed in more detail in Chapter 6.

Numerous respondents suggest establishing a rule without loopholes and including language that minimizes “other exemptions” in the alternatives. Conversely, other constituents believe that the proposed rule should allow for exemptions and waivers.

Public Concern: The Forest Service should preserve ecosystems by establishing laws without loopholes.

Preserve ecosystems by making laws without loopholes that do what they sound like they’re intended to do. (Individual, Albuquerque, NM - #5803.83000)

Public Concern: The Forest Service should include language that minimizes “other exemptions” in the alternatives.

Roads excepted-Alternative 4 (or 2 or 3) would allow some roads to be built-an estimated 368 miles for public health and safety, outstanding rights such as access to private property, and “other exceptions.” Please include language to narrow these exceptions, minimize the miles of road built, and avoid abuse of what might otherwise become a loophole. (Individual, Idaho Falls, ID -#9815.10100)

Public Concern: The proposed rule should allow exemptions and waivers.

I urge you to issue a final policy that provides for exemptions or waivers. (Individual, Great Falls, MT - #4903.64300)

Be reasonable where exception’s can be made. (Individual, Plains, MT - #4930.64350)

4.10 Proposed Rule Development

This section discusses the comments regarding the development of the proposed rule, including issues of the duration, authority, and scope of the rule; its general management direction; how the rule will be implemented; and the need for the rule. The development of the proposed rule evokes an array of responses from the public. Many of the responses include questions of clarification regarding the authority and scope of the proposed rule. Some respondents believe that the Forest Service should clarify the duration and statutory authority of the proposed rule. Another question of clarification put forth by some is whether the proposed rule will apply to national monuments. One citizen, citing the example of Assateague Island, wonders whether beaches will be considered roadless areas in the Final EIS. Additionally, the proposed rule should clarify how many of the 53 million acres of roadless areas will ultimately be protected, according to one person.

Others request changes in the general management direction of the proposed rule. Some respondents request that the proposed rule call for site-specific evaluations of roadless areas. "No one I have contacted within the Forest Service can tell me with any certainty just what, if any, benefit there will be to wildlife, flora, fauna, etc. from basically slamming the door on areas that already enjoy access," protests one person.

On the subject of implementation, one elected official insists that the proposed rule not supercede projects that have already met all legal requirements. "Those local decisions based on NEPA review should not be exterminated by a NEPA document of national scope creating a national policy affecting local environments," this California politician asserts. The relationship between the proposed rule and the current forest planning process educes many suggestions and questions from the public. "Land allocation decisions should be left to forest planning, not transportation policy rulemaking," observes one person. Others wish to know whether the proposed rule will require land use designation changes and amendments to forest plans. More specifically, one citizen points out that the proposed rule would override existing forest guidelines for water management. The Forest Service should seriously consider such a contentious probability, according to this individual.

Citing similar concerns, one Georgia State Agency Representative suggests that the Forest Service consider that the proposed rule may hinder the resolution of key issues in forest plans. Taking a broader view, several individuals and groups request that the Forest Service address the effects of this proposed rule on forest plans throughout the nation, such as the Sierra Nevada Framework Project as well as regional planning efforts. Taking this concern one step further, one timber association representative claims that the proposed rule essentially makes forest plans meaningless. "The tens of millions of dollars spent in developing forest plans and in encouraging public input on land allocations in a particular national forest become money poorly spent if any Administration may freely disregard forest plans by adopting a politically expedient rulemaking," charges this individual.

Some respondents feel so strongly about these potential problems with the proposed rule that they exhort the Forest Service to reconsider the adoption of this proposal and question the need for such a rule. Some believe that the proposed rule would necessitate the consideration of additional wilderness designation, which is perceived as restrictive to recreational access.

Similarly, one person indicates that wilderness designation may occur without regard for recreational opportunities. Another respondent remarks that the majority of roadless areas have already been evaluated and deemed not suitable for wilderness status.

Also questioning the need for the proposed rule, one Montana resident insists there are already enough roadless and wilderness areas. Existing forest management plans already ensure a healthy environment, according to another individual, precluding the need for the proposed rule. "I depend on the National Forest for my livelihood. I depend on the National Forests for recreation. I depend on the National Forests to maintain a healthy environment, with clean water, clean air, and bio-diversity. All these objectives are met by the existing forest management plans," according to this person.

Additional comments are divided into Subsections: 4.10.1, Adequacy of Inventories and Analysis; 4.10.2, Road Classifications; and 4.10.3, Wilderness and National Monument Designations.

Public Concern: The Forest Service should clarify the duration and statutory authority of the proposed rule.

The duration of the prohibitions against road building in inventoried roadless areas at first confused me. The summary volume would have led me to believe that subsequent forest plans could undo this rule's prohibitions. On more careful reading, especially of the rule itself, I was persuaded that the rule is intended to apply until it is superseded by another rule and could not be overruled at the Forest level in forest plan revision. If that is indeed your intention, would you like to make that statement stronger, more overt? (Individual, Camp Sherman, OR - #6100.33510)

Public Concern: The Forest Service should clarify whether the proposed rule will apply to national monuments.

The DEIS appears to be silent on the issue to whether National Monuments are to be included in the inventoried roadless area acreage totals. See Charts in appendix B of the DEIS . It appears that National Monuments are excluded from the protections set forth in the Roadless Area Conservation Policy. The Forest Service must clarify in the final rule whether or not monuments are included within the inventory. API recommends that these national treasures be afforded the same prohibition and procedural protections for unroaded inventoried roadless areas. (Environmental/Preservation Organization, Sacramento, CA - #15906.41400)

Public Concern: The Forest Service should clarify whether beaches are roadless areas.

I have reviewed the information on your website regarding the current environmental impact proposal and moratorium on new road construction in the inventory of "roadless" areas. My question is: since Assateague is a beach…is it a roadless area? I am guessing yes, and if so, under threat of losing all off-road access. But then I find that it is NOT in your inventory for either MD or VA (the island is in both states). Will off-road (beach) access be terminated on Assateague, if and when this proposal goes into effect (winter 2000 by your proposed timeline)? Can you please clarify this issue immediately, as it is of critical importance to the people on the Eastern Shore. (Recreational Organization, No Address - #2409.34000)

Public Concern: The proposed rule should clarify how many of the 53 million acres will be protected.

The initiative does not estimate how many of the 53 million acres are expected to actually be declared protected. This is very misleading to the public. (Individual, San Ramon, CA - #8492.42000)

Public Concern: The proposed rule should call for site-specific evaluations of roadless areas.

I strongly urge that individual roadless areas be evaluated site-specifically, as a prudent alternative to the large-scale blanket initiative that's been proposed. As diverse ecosystems, our public forests deserve no less. (Individual, No Address - #6274.41240)

No one I have contacted within the Forest Service can tell me with any certainty just what, if any, benefit there will be to wildlife, flora, fauna, etc. from basically slamming the door on areas that already enjoy access. I do not have a problem with closure on a site-specific basis; that is good management. I do have a problem with blanket closures in lieu of sound management practices, particularly when coupled with the above flaws in this initiative. (Individual, North Charleston, SC - #8277.41240)

Public Concern: The proposed rule should not supercede projects which have already met all legal requirements.

The Forest Service should recognize that uses exist in areas which may be subject to the proposed Roadless Area Policy, which uses have been lawfully constructed and permitted. Those uses have been subject to prior NEPA review. Those prior NEPA decisions are generally based on local conditions and thus more accurately reflect local environmental conditions. Those local decisions based on NEPA review should not be exterminated by a NEPA document of national scope creating a national policy affecting local environments. (County Elected Official, Jackson, CA - 16029.72230)

Public Concern: The proposed rule should leave land allocation decisions to forest planning.

Limit the scope of this rulemaking to the development and management of a transportation system needed to achieve forest plan goals and objectives. Land allocation decisions should be left to forest planning, not transportation policy rulemaking. (Individual, Eagle, ID - #13488.71300)

Public Concern: The Forest Service should clarify whether the proposed rule will require land use designation changes and amendments to forest plans.

Under this Draft EIS proposal, will new “roadless areas” become a land use designation? If so, does this land use designation change from matrix, late-successional reserve or riparian reserve to “roadless” require an amendment to the Northwest Forest Plan and individual Forest Plans? (Timber Association, Medford, OR - #13658.72230)

Public Concern: The Forest Service should consider that the proposed rule would override existing forest plans involving water management.

This proposal will make water management more difficult, and overrides the sound land management efforts in existing Forest Plans. (Individual, No Address - #13810.83100)

Public Concern: The Forest Service should consider that the proposed rule would hinder the resolution of key issues in forest plans.

The forest planning process, while not yet completed, is likely to provide for continuing the roadless character of most of Georgia's inventoried roadless acres, while also retaining some habitat management options. The national rule may very well hinder resolution of the key issues that remain to be resolved in the final version of the plan. (State Agency, Social Circle, GA - #13974.72230)

Public Concern: The Forest Service should address the effects of this proposed rule on forest plans throughout the nation.

This proposed rule will affect Forest Plans throughout this entire nation. This has taken a long period of study on the part of this USFS and demands very serious study, consideration, and analysis on our part. (Environmental/Preservation Organization, Harte, CA - #92.71100)

Mark me down in favor of the roadless initiative, but please realize that I expect further protection for these areas when it comes time for the Individual Forest Plans. (Individual, No Address - #5693.72230)

Please accept my strong opposition to the Proposed and Preferred Alternative in the Forest Service Roadless Area Conservation DEIS for the following reasons: The Proposal completely ignores all the hard work and science that went into existing Forest Plans and is a top-down directive that covers all inventoried roadless areas regardless of their management needs. (Individual, Hamilton, MT - #5693.72230)

SIERRA NEVADA FRAMEWORK PROJECT

It is mentioned that any changes to Forest or Grassland designation would come at the time of plan revision. The plan revisions are not done on a set timetable and many are thought to be near the deadline for review. Add to this the potential overturning of any revised plan by the Sierra Nevada Framework Project, which is not in process, is confusing at best. WE WOULD REQUEST THAT ALL DISCUSSION REGARDING ROADLESS DESIGNATION BE HEAVILY WEIGHTED IN THE RESEARCH BEING GATHERED FOR THE SIERRA NEVADA FRAMEWORK DEIS. IN THE CASE OF SIERRA-AT-TAHOE, IF THE DECISION IS MADE TO ALLOW THE REVISED FOREST PLAN TO REFLECT CONTINUED “POTENTIAL WINTER SPORTS” DESIGNATION TO THE AREA TO THE EAST OF SIERRA, THEN THE FRAMEWORK SHOULD STRONGLY TAKE THIS INTO REVIEW. As stated earlier, to make piece-meal designations of small areas without considering the best long-term strategies for the whole area is not wise nor prudent. (Individual, Lake Tahoe, CA - #2113.72230)

SOUTHERN APPALACHIANS

I want to mention that most of the national forests in the Southern Appalachians are currently revising their forest plans. I believe the plans should be developed in a way that will be most consistent with the eventual protection of all roadless areas under the proposed rule. In fact, the proposed rule envisions using the forest planning process to ensure maintenance of roadless character and protection of the ecological benefits these areas provide. Therefore I urge the Forest Service to ensure that plans currently being developed in the Southern Appalachians set aside all roadless areas in the most protective prescriptions. (Individual, Clemmons, NC - #1686.10110)

Public Concern: The Forest Service should consider that the proposed rule essentially makes forest plans meaningless.

This attempted reversal of the planning direction for 17% of the acreage in the National Forest System constitutes "top down" decision making in the extreme. The rulemaking should be terminated because of its pernicious policy implications alone. The rulemaking essentially makes forest plans meaningless. The tens of millions of dollars spent in developing forest plans and in encouraging public input on land allocations in a particular national forest become money poorly spent if any Administration may freely disregard forest plans by adopting a politically expedient rulemaking. (Timber Association, Eugene, OR - #15879.10200)

Public Concern: The Forest Service should not adopt the proposed rule.

THE PROPOSED RULE NECESSITATES THE CONSIDERATION OF WILDERNESS DESIGNATION

We are opposed to the current Roadless Area Conservation rule because it necessitates the consideration of any 'roadless area' as a future "Wilderness Area." 37% of the Chattahoochee/Oconee National Forest in GA is "Wilderness Area." Thus, this leaves 37% of the forest without management, limits access to the majority of forest visitors and is a direct violation of the ADA! (Recreational Organization, No Address - #9089.10200)

WILDERNESS DESIGNATION MAY OCCUR WITHOUT REGARD FOR RECREATIONAL OPPORTUNITIES

I oppose the roadless initiative because identified roadless areas may be placed on the fast tack for wilderness designation without regard for any existing trails or recreational opportunities in those areas. This possibility concerns me even more for those roadless areas adjacent to existing wilderness areas. The roadless initiative, transportation rule, and ecosystem protection rule make the forest even more susceptible to meddling by special interest groups and have the ultimate goal of locking the public out of the public land for any activities. (Individual, Fort Collins, CO - #11334.10200)

THE MAJORITY OF ROADLESS AREAS HAVE ALREADY BEEN EVALUATED AND DEEMED NOT SUITABLE FOR WILDERNESS STATUS

I object because the majority of the lands proposed to be saved have already been evaluated and deemed not suitable for wilderness status. (Individual, San Ramon, CA - #8492.10200)

THERE ARE ALREADY ENOUGH ROADLESS AND WILDERNESS AREAS

There are enough roadless areas and wilderness areas in Montana. The percentage of people who use these areas is very small. To be able to use roadless areas an individual must be blessed with three resources, time, money and good health. Being a middle class citizen with a wife and three young children, we have little time for recreation. When we do have time, we head to the great outdoors, however, we go to places which are accessible by roads. Our six and four-year-olds cannot carry a backpack nor do we have time for horses or llamas. Prior to marriage and children I did have time for annual hikes in the Bob Marshall Wilderness which were high points of my life. I do believe there needs to be places set aside for human solitude. However, we already have an abundance of roadless land and there is land targeted in the National Roadless Protective Initiative which should be available for multiple uses and good stewardship timber harvest practices. These areas benefit more people than the small percentage of people who are using the roadless and wilderness areas today. (Individual, Kalispell, MT - #10759.10200)

EXISTING FOREST MANAGEMENT PLANS ALREADY ENSURE A HEALTHY ENVIRONMENT

I depend on the National Forest for my livelihood. I depend on the National Forests for recreation. I depend on the National Forests to maintain a healthy environment, with clean water, clean air, and bio-diversity. All these objectives are met by the existing forest management plans. (Individual, Ontonagon, MI - #8109.41510)

4.10.1 Adequacy of Inventories and Analysis

The adequacy of roadless area inventories and the analysis of these areas for inclusion in the proposed rule evokes many responses from the public. Several comments address the need to perform a new road inventory. "Why hasn't an inventory been done prior to this proposal?" queries one respondent. Similarly, one person recommends that the Final EIS reflect inventories and evaluations that are no more than five years old. Another reason some people offer for performing a new road inventory is that the Forest Service has acquired more roadless land since previous inventories were completed. These respondents request that such lands be included in the proposed rule. Finally, one respondent requests that the Forest Service state when it will conduct an inventory of the roadless areas.

This subsection is further divided into: 4.10.1.1, RARE I and RARE II; 4.10.1.2, Roadless Area Inventory Criteria; and 4.10.1.3, Further Analysis.

In 4.10.1.1, respondents discuss previous inventories. Rather than conducting new roadless area inventories, some respondents believe the Forest Service should go forward with inventories that have already been completed. One citizen feels that the Forest Service should rely on the RARE I inventory for roadless designations. Another individual believes that the Forest Service should include all RARE II areas as part of the final rule.

However, one environmental organization suggests that the Forest Service modify language in the Draft EIS to acknowledge that RARE II and Forest Plan inventories do not reflect the current knowledge and public awareness of the important values of roadless areas. Citing information in the DEIS which indicates that some of the national forests have had significant percentages of previously designated RARE II areas degraded through road building and timber harvest, an individual submits that the Forest Service should explain the extent and impacts of road-building and logging in RARE II roadless areas.

Another environmental organization contends that the entire RARE II inventory is inadequate because it omits areas that meet the necessary criteria. This group offers a specific example, such as Camp Hutchins, to support their contention.

Questions and suggestions for roadless area inventory criteria are analyzed in 4.10.1.2. Many respondents request that the specific characteristics the Forest Service wishes to protect in each inventoried roadless area be delineated in the Final EIS. A less capacious suggestion is offered by a conservation organization. This group believes the Forest Service should identify roadless area characteristics that are clear and not open to interpretation. Another individual encourages the Forest Service to consider establishing specific criteria for roadless area implementation. One environmental organization requests that the Forest Service revise the list of roadless characteristics. Even more specifically, a recreational organization recommends that the Forest Service include "lack of roads" in its list of roadless characteristics, and a conservation organization lists scenic management, historical areas, and Wilderness potential among its recommendations. Similarly, another conservation organization suggests that the Forest Service eliminate references to dispersed motorized recreation as a characteristic of roadless areas in the final rule. One respondent urges the Forest Service to establish depth and width criteria so

roadless areas remain manageable. The Forest Service should exclude unsuitable roadless areas from the roadless inventory, according to some. Sites that have been determined as not suitable for wilderness designation should not be included on the inventoried roadless list, according to one such respondent. Another suggestion offered by respondents is to use a computer-based modeling system to assign values of use and condition that would be used as management criteria applicable to inventoried roadless areas. Equally daunting is the suggestion from an Oregon resident that no set of criteria can adequately capture the unique qualities of individual roadless areas.

The status in the proposed rule of uninventoried roadless areas is unclear to many readers of the Draft EIS. They feel that the Forest Service should address the potential impacts of this rule on those areas. Citing the small percentage of lumber currently being generated by National Forest System lands, others contend that the Forest Service should add smaller uninventoried roadless areas to the current roads inventory.

One final question of clarification rounds out this section. An individual asks that the Forest Service clarify why the estimated roadless acreage has grown over the course of planning for the proposed rule. "A main selling point of the program was the [roadless] areas were a mere 8% of the total acres of the national forests. Now it is 25%," this person remarks. "How and why did the acreage grow so much?"

In addition to the clarification requested regarding previous inventories, many respondents offer suggestions for further roadless area analysis in 4.10.1.3. One person posits that the Forest Service should not declare large areas of the national forests as roadless without first conducting an inventory of these areas for existing trails. Another individual, also finding current inventories lacking, asks that the Forest Service inventory any roadless area of 1000 acres or more.

Others offer specific regions or forests they believe should be re-inventoried. Some respondents request that the Forest Service reevaluate the number of roads in New England and Mid-Atlantic forests. Similarly, the Forest Service should re-inventory areas within the Hoosier National Forest, according to one Indiana resident. This person identifies specific areas within the forest that have been purportedly underestimated. Additionally, one denizen of the Grand Canyon State asks that the Forest Service resurvey Arizona to ensure accurate roadless acreage. The final request of this section involves the Chippewa and Superior National Forests. The Forest Service should identify additional unroaded areas in these forests, according to one constituent.

Public Concern: The Forest Service should perform a new road inventory.

There has not been a proper inventory performed on these roads prior to proposing this Forest Service Roadless Area Conservation Proposed Rule. The last inventory performed was done on these roads in 1978. That was twenty-two years ago. Why hasn't an inventory been done prior to this proposal? (Individual, Yellow Jacket, CO - #3295.64421)

Public Concern: The Final EIS should reflect inventories and evaluations that are no more than five years old.

The final EIS must reflect inventories and evaluations no more than five years old. (Individual, Mackay, ID - #8575.64421)

Public Concern: The Forest Service should include land acquired since previous inventories were completed.

Congress mandated a comprehensive study of the land received from Big Sky Lumber in order to incorporate this land into the Forest Plan, a process which is now underway. Obviously, instead of this process and the Roadless Initiative proceeding in isolation FROM each other, these studies must be combined to the extent they overlap. Not only is such a combination the logical means of assuring the resource protection which the public and Congress expected in acquiring the land from Big Sky Lumber, but this result is also mandated by President Clinton's original directive [to] the Forest Service: Specifically, I direct the Forest Service to develop, and propose for public comment, regulations to provide appropriate long-term protection for most or all of these currently inventoried 'roadless' areas, AND TO DETERMINE WHETHER SUCH PROTECTION IS WARRANTED FOR ANY SMALLER 'ROADLESS' AREAS NOT YET INVENTORIED." President Clinton, October 13, 1999 (Environmental/Preservation Organization, Bozeman, MT - #16097.72200)

Public Concern: The Forest Service should state when it will conduct an inventory of the uninventoried roadless areas.

Prior to adopting the final rule, the Forest Service should clearly specify when the "uninventoried roadless areas" are to be inventoried and clarify that existing management is not changed prior to completion of the inventory. Absent a clear and strict time line, the failure to act could create additional gridlock in management of the National Forests. (County Agency, John Day, OR - #16087.53400)

4.10.1.1 RARE I and RARE II

Public Concern: The Forest Service should rely on the RARE I inventory for roadless designations.

I disagree with any increase in the number of roadless areas in the U.S. We identified all of the appropriate areas during RARE I. RARE 2 wasn't needed, and included areas that should have never been designated as roadless areas. Many of them were already roaded and being used by the public and industry alike. Now they are unmanaged and in chaos. Now you are proposing additional roadless areas from regions that have already been evaluated twice, and passed over. I say you did it right the first time, you don't need to do it again and again. (Individual, Imbler, OR - #5783.10200)

Public Concern: The Forest Service should include all RARE II areas as part of the final rule.

In Texas, we want all Rare II areas protected. That should amount to about 31,000 acres, since there were 69,000 acres of Rare II areas, and about 38,000 of them are now wilderness areas. Texas National Forests only has 6% of its acreage in the non-roaded category of the Recreation Opportunity Spectrum, with 94% in the roaded category. We protest the fact that the forest supervisor has improperly excluded all but 4,000 acres of the Rare II areas from

consideration, and we call on the deciding official to include all of these areas in the Final Rule and EIS. (Environmental/Conservation, Houston, TX - #8936.70000)

Public Concern: The Forest Service should modify language in the Draft EIS to acknowledge that RARE II and forest plan inventories do not reflect new knowledge and public awareness of the important values of roadless areas.

The statement in the DEIS about the inventoried roadless area having been already evaluated for wilderness recommendation and rejected should be deleted from the FEIS and replaced with a statement noting that RARE II and Forest Plan inventories do not reflect the new and current scientific knowledge and increasing public awareness of the nationally important values of roadless areas. The FEIS should also inform the public about the NFMA process of evaluating roadless areas during forest plan revisions. (Environmental/Preservation Organization, Cave Junction, OR - #16188.53600)

Public Concern: The Forest Service should explain the extent and impacts of road-building and timber harvest in RARE II roadless areas.

There is some shocking information in the DEIS which indicates that some of the national forests have had significant percentages of previously designated roadless areas (in the RARE II program in 1978) degraded through road building and logging since that time. For example, in Region 8, the George Washington NF in Virginia had 261,000 acres of roadless areas identified in the RARE II program. Of that, only 32,000 acres have designated wilderness. Yet the current initiative now has only 32,000 acres designated as roadless. This leaves nearly 200,000 acres of previously identified roadless areas unaccounted for, which means that they have been degraded by roads and logging. In Region 9, the Monogahela NF in West Virginia had 173,000 acres identified in the RARE II analysis of which 28,000 are designated as wilderness. Yet, the current proposal only identifies 79,000 acres of current roadless areas in the Monogahela. This means that over 65,000 acres of previously inventoried roadless areas are unaccounted for and likely degraded. Other forests with similar significant reductions in acreage include the White Mt. in New Hampshire, the Chequamegon-Nicolet in Wisconsin, and the Cherokee in Tennessee. How did this happen and what is the impact of this? (Individual, Brookport, IL - #126.84600)

Public Concern: The Forest Service should reevaluate the adequacy of the RARE II Inventory analysis.

Since Camp Hutchins should have been included as a RARE II area, the Forest Service gave no explanation for not including it, the Forest Service still has not been able to come up with an explanation, and Camp Hutchins still meets the requirements for a RARE II area, the proper course of action would be to prepare an errata sheet for the RARE II EIS to include Camp Hutchins as a RARE II area. Since the Forest Service is only relying on the part of the RARE II EIS that identified the RARE II areas and the recommendations are not being used, a SEIS would not be needed. (Environmental/Preservation Organization, Wood River, IL - #43581.50000)

4.10.1.2 Roadless Area Inventory Criteria

Public Concern: The Final EIS should clarify what characteristics the Forest Service wants to protect for each inventoried roadless area.

In the FEIS the Forest Service should describe each inventoried roadless area and for each area describe what characteristics the Forest Service wants to protect, and current or potential fire, insect, or disease risks, and how the Roadless Initiative would change the forest plan direction. (Individual, Paonia, CO - #11343.30000)

Public Concern: The Forest Service should identify roadless area characteristics which are clear and not open to competing interpretations.

In addition, the roadless area characteristics listed at proposed rule # 294.13 are vague and therefore vulnerable to mis-application in ways that may exploit roadless areas rather than conserve them and their national significance. (Environmental/Preservation Organization, Cave Junction, OR - #16188.82000)

Public Concern: The Forest Service should consider establishing criteria for roadless area implementation.

As to solitude, I have not found any place in the forest wilderness system where I have been able to escape man. Whether it is in the small Bucks Wilderness, the California State Park Sinkyone Wilderness or well off the roadways in Yosemite, my solitude has been broken more than once a day by the sound and sight of jet airplanes. Perhaps the airspace should be managed around Wilderness such that we can find the place where true solitude is possible. Perhaps a circle of influence of 100 to 200 miles would allow places for true wilderness. Maybe the roadless areas should be screened by the availability of these criteria. If you can see or hear any man or machine on the acre it should not be classified as wilderness or roadless by the old definitions. (Individual, Chico, CA - #10596.90010)

Public Concern: The Forest Service should revise the list of characteristics and values of roadless areas.

The characteristics and values of roadless areas must first be identified. The following list includes characteristics identified in the summary of the DEIS (S-14). Seven additional characteristics have been identified, and should be considered as well.
1) Soil, water, and air
2) Sources of public drinking water
3) Diversity of plant and animal communities
4) Habitat for threatened, endangered, proposed, candidate, and sensitive species and for those species dependent on large, undisturbed areas of land
5) Primitive, semi-primitive non-motorized, and semi-primitive motorized classes of dispersed recreation
6) Reference landscapes
7) Landscape character and scenic integrity
8) Traditional cultural properties and sacred sites
9) Other locally identified unique characteristics
*10) Roadlessness
*11) Natural quiet; opportunity for solitude
*12) Natural fire regime
*13) Natural watershed function
*14) Shape and size of area
*15) Roadless area integrity
*16) Wildlands Values; associated characteristics. (Environmental/Preservation Organization, Albuquerque, NM - #43737.32000)

Public Concern: The Forest Service should consider “lack of roads” as a “roadless characteristic.”

We find it very inconsistent that lack of roads is not listed as a “roadless characteristic.” (Recreation Organization, Salt Lake City, UT - #15896.71200)

Public Concern: Part 294.13(a) of the final rule should include new evaluation criteria for scenic management, historical areas, and wilderness potential.

Landscape character and scenic integrity;
CFR 294.13(a)(7): ALSO INCLUDE EVALUATION OF OTHER ASPECTS OF SCENIC MANAGEMENT SYSTEM (SMS). FOR EXAMPLE, EVALUATE AREAS SEEN FROM BLUE RIDGE PARKWAY OR APPALACHIAN TRAIL. WE SUGGEST INCLUDING REFERENCE TO "SPECIAL PLACES" IDENTIFIED IN THE SMS IN THIS SECTION.
…Other locally identified unique characteristics.
CFR 294.13(a)(9): INCLUDE "SPECIAL PLACES" FROM SMS HERE IF NOT INCLUDED.
(Environmental/Preservation Organization, No Address - #15883.90210)

CFR 294.13(a): ADD THE FOLLOWING CATEGORY TO THE LIST (a)(1-9):
"HISTORICAL AREAS". (Environmental/Preservation Organization, No Address - #15883.90230)

CFR 294.13(a): ADD THE FOLLOWING CATEGORY TO THE LIST (a)(1-9):
"WILDERNESS POTENTIAL". THE ORIGINAL PURPOSE FOR CONDUCTING ROADLESS INVENTORIES WAS TO REVIEW THEIR SUITABILITY FOR WILDERNESS AND TO RECOMMEND SUITABLE AREAS FOR ADDITION TO THE WILDERNESS PRESERVATION SYSTEM. THIS SHOULD BE EXPLICITLY RECOGNIZED IN THE LIST OF CHARACTERISTICS, WHICH SHOULD BE EVALUATED IN REVISION OF PLANS. (Environmental/Preservation Organization, No Address - #15883.90240)

I believe that one component used to evaluate "roadless areas" deals with the "historic values" contained within the roadless areas to be considered. I have prepared a very brief "Heritage Resources Summary Evaluations" document that summarizes the potential and known "historic values" for these areas. Included within "historic values', as I see it, should be three components:
1. Archaeological Value (dealing primarily with prehistoric archeological sites)
2. Historic Value (dealing primarily with historic sites)
3. Other Values (dealing primarily with Native American cultural values and "traditional cultural places" or TCPs)
(Federal Agency, Alturas, CA - #16099.90230)

Public Concern: Part 295.13a of the final rule should eliminate reference to dispersed motorized recreation as a characteristic of roadless areas.

We also recommend that the final policy drop the reference to "motorized" dispersed recreation as a characteristic of roadless and unroaded areas to be considered in the forest plan revision process (p. A-27, [section] 295.13 (a)(5)). (Environmental/Preservation Organization, Flagstaff, AZ - #43415.91610)

Public Concern: The Forest Service should consider that no discrete set of criteria can characterize the unique values and characteristics of individual roadless areas.

It is my opinion that the individual roadless area values and characteristics are each unique in themselves. And that an environmental analysis must be completed for each area--NOT for the 51.5 million acres of [national forest] land in just one action. (Individual, McMinnville, OR - #1071.63000)

Public Concern: The Forest Service should conduct a state-by-state analysis of roadless areas.

Before turning to the Proposed Rule itself, let me note that one of the challenges in meaningfully assessing it was the difficulty in determining its specific impacts on the forests and communities of Oregon. While I understand this is a rule developed for national application, it would have nevertheless been much more helpful to have had at least a state-by-state analysis of the condition of roadless areas, along with the impacts of the proposed restrictions and procedures. I encourage you to include such a state-by-state analysis in your Final EIS, if at all possible. Please see the enclosed memoranda in which we suggest that certain issues be further explored in your Final EIS and Rule. (State Elected Official, Salem, OR - #18661.70000)

Public Concern: The Forest Service should use a computer-based modeling system to assign values of use and condition to inventoried roadless areas.

What I propose and I suspect is already on the table, is a compromise of sorts. I propose that the USFS accurately inventory all USFS lands in question into a computer-based modeling system, where all lands are assigned values of use and condition. For example, some of that 43 million acres of USFS land is clearly best for wilderness designation, while other is best for recreation. Some is suitable for the historic definition of multi-use, meaning most of the above, including harvest. Each of these lands designated for multi-use would be assigned some level of maturity to easily ascertain annual harvest potential.
If the annual agreed upon harvest is beyond that available in currently roaded inventory, a suitable portion of the 43 million acres deemed harvestable would act and be managed as a bank account of surplus harvest. (If any portion of this “bank account” could be commercially harvested without roads, this should be preferred practice.) Forest products companies would also be responsible for ensuring the “bank account” is conservatively managed and augmented when possible. (Individual, Fort Collins, CO - #358.61300)

Public Concern: The Forest Service should establish depth and width criteria to assure that irregularly shaped roadless areas remain manageable.

We have some real concerns concerning recent Roadless Area inventory. Number of acres alone is not a real good criterion as it is possible with GIS technology to identify sizable areas in a pattern of fingers that would be virtually impossible to manage on the ground. There has got to be some depth and width criteria for these areas in order to make them meaningful and manageable. Also, we feel that designating areas as smaller than 5,000 acres will result in a series of small “hands-off” islands across the landscape that will be unmanageable, unenforceable and the potential infection sources of continued forest health problems. (County Elected Official, Kanab, UT - #47910.71000)

Public Concern: The Forest Service should state the overall size of non-inventoried areas and address the potential impacts of this rule on those areas.

How large is the non-inventoried area within the NFS system and what impact will this proposed rule have on use of these lands for future uses? It is unclear if the proposed rule will affect non-inventoried roadless areas in the national forests. (Individual, Moses Lake, WA - #718.71100)

Public Concern: The Forest Service should add smaller uninventoried roadless areas to the current roadless inventory.

The Forest Service's data also shows that only 4 percent of the nation's wood supply comes from our national forests; and of that small amount only about 5 percent of it would be affected if logging is discontinued in the

roadless areas included in the Forest Service inventory. So only about 2 tenths of 1 percent (0.02%) of the nations wood supply would be affected by discontinuing logging in these roadless areas. The addition of smaller uninventoried roadless areas to this inventory, which should be done, would not make a significant difference in these numbers. (Individual, Knoxville, TN - #6846.93300)

Public Concern: The Forest Service should exclude unsuitable roadless areas from the roadless inventory.

We believe that public lands that have been removed from Wilderness (Hogback Basin) should also and concurrently be removed from roadless designation. ROADLESS DESIGNATION WAS INITIATED TO INVENTORY POTENTIAL SITES FOR WILDERNESS. SITES SUCH AS HOGBACK BASIN, HAVE BEEN DETERMINED AS NOT SUITABLE FOR WILDERNESS AND THEREFORE, HAS NO NEED OR RIGHT BEING ON THE INVENTORIED ROADLESS LIST. (Individual, White Pass, WA - #17633.57100)

Public Concern: The Forest Service should clarify why the estimated roadless acreage has grown over the course of planning for the proposed rule.

In the first round of planning the roadless acreage was estimated to be about 8% and a main selling point of the program was the areas were a mere 8% of the total acres of the national forests. Now it is 25%. How and why did the acreage grow so much? (Individual, Chico, CA - #10596.33300)

4.10.1.3 Further Analysis

Public Concern: The Forest Service should not declare large areas of the national forests roadless without first conducting an inventory of these areas for existing trails.

As a concerned OHV trail user, I am alarmed by the move to declare large areas of the national forests “roadless” without an inventory of these areas for existing trails. (Individual, Valley Park, MO - #2201.10200)

Public Concern: The Forest Service should inventory any roadless area of 1000 acres or more.

Any area 1,000 acres or more should be inventoried, which in Washington is about ½ of our national forest roadless areas. (Individual, No Address - #6270.10110)

Public Concern: The Forest Service should reevaluate the number of roads in New England and Mid-Atlantic forests.

I would also encourage you to think about reevaluating the number of roads from our forests in the New England and Mid Atlantic Regions. Having lived in New Hampshire, I appreciate the delicacy of these forests. Acid rain is enough for them to contend with. (Individual, Minneapolis, MN - #6306.71300)

Public Concern: The Forest Service should re-inventory areas within the Hoosier National Forest.

As for the Hoosier National Forest in southern Indiana, we feel that the program's 7,000 inventoried acres at Mogan Ridge is probably understated, and should be reevaluated.…there are other parts of the Hoosier which should be inventoried, including Nebo Ridge, and six or eight others such as Middle Fork Deer Creek, Hickory Ridge, Porter Hollow, and any others containing 1000 acres or more of roadless area. (Individual, Huntertown, IN - #2756.64423)

Public Concern: The Forest Service should resurvey Arizona to ensure accurate roadless acreage.

DEIS only includes 1.1 million of acres of roadless USFS land in Arizona. In fact, there are 1.5 million acres. We should include the full 1.5 million acres for Arizona, and any other incomplete states should be re-surveyed. (Individual, Scottsdale, AZ - #4633.33520)

Public Concern: The Forest Service should identify additional unroaded areas in the Chippewa and Superior National Forests.

I urge the Forest Service in Minnesota to begin immediately to identify additional unroaded areas in Chippewa and Superior N.F's-beyond those previously inventoried. (Individual, Minneapolis, MN - #13302.44400)

4.10.2 Road Classifications

The numerous varieties and classifications of roads and trails within the National Forest System elicit many suggestions regarding their treatment under the proposed rule. Some respondents recommend that the Forest Service carry out road classification on a regional, rather than national, basis. Others caution the Forest Service that the speed with which this initiative is being implemented is causing inaccurate roadless classifications.

Stating that the proposed definitions of "unroaded" and "classified road" eliminate far too many areas deserving of protection, one person suggests that the Forest Service create a new category of unroaded areas. Another respondent, also dissatisfied with the definition of "unroaded," requests that the Forest Service change the definition of "unroaded" to "a portion of an inventoried roadless area in which no classified road has been constructed since the area was inventoried." A similar definitional change is requested by a Nevadan. The Forest Service should refer to areas with pre-inventory roads as semi-roadless areas and clarify how they will be affected by this rule," asserts this individual.

The types of roads allowed within areas designated as roadless also evokes varied responses from the public. The Forest Service should not designate areas which contain 2477 rights of way through them as roadless areas, according to some. When delineating roadless areas, others contend, the Forest Service should classify temporary roads as roads. Additionally, several respondents believe that the Forest Service should include historic roads, 4-wheel drive routes, and trails less than 50 inches wide in its roadless area inventory.

Similarly, many people ask that the Forest Service clarify whether decommissioning or obliterating roads would create a roadless area. Other respondents require no such clarification. They exhort the Forest Service to designate areas with a few roads that could be blocked or obliterated as roadless. "Areas with a few roads that could be 'put to bed,' that is gated, disked, planted with locally native plants and then obliterated, should be considered roadless," according to these constituents.

Citing analogous reasons, some individuals maintain that the Forest Service should not allow "ghost" roads to disqualify an area as roadless. Like-minded respondents request that areas with primitive roads, jeep trails or classified roads should not be disqualified from roadless designation. Wishing to protect certain areas, other citizens ask that the Forest Service clarify the status of "phantom roads" to ensure that road construction could not be performed under the guise of repairing existing roadways.

A miscellany of diverse concerns rounds out this section. Exactly how the roaded portions of inventoried roadless areas will be determined by the Forest Service should be clarified in the Final EIS, according to one person. Another respondent believes that the Forest Service should consider removing areas from the roadless area classification that cannot be logged with temporary roads. Similarly, one timber industry representative thinks that the Forest Service should discontinue the use of the term "roadless" to describe areas that contain forest products. Finally, one Colorado resident suggests that the Roadless Area designation should be eliminated because, "it does nothing but place constraints on resource uses, planning and management efforts while taking commitment of funds that could be better used."

Public Concern: The Forest Service should carry out road classification on a regional basis.

Road classification should be regionalized--based on geography, climate, etc.--not nationwide. (Individual, Duluth, MN - #536.44300)

While the proposed rules address classified and unclassified roads, we suggest that it also develop a management strategy for those roads that have been closed or obliterated in the last few years to create unroaded areas. These recently created unroaded areas do not contain the same basic values that are the driving force for this rulemaking and should therefore either be excluded or a new category developed for these lands. (County Agency, John Day, OR - #16087.64351)

Public Concern: The Forest Service should consider that the speed with which this initiative is being implemented is causing inaccurate roadless classifications.

It appears that the speed with which the initiative is being implemented is leading to a significant amount of our land being classified as "roadless" even though it has undocumented trails and other routes. (Individual, Edwall, WA - #2335.44420)

Public Concern: The Forest Service should create a new category of "unroaded" areas.

The creation of a new category of "unroaded" areas may be warranted, but the proposed definitions of "unroaded" and "classified road" eliminate far too many areas deserving of protection. (Individual, San Diego, CA - #25303.64400)

Public Concern: The Forest Service should change the definition of "unroaded" to "a portion of an inventoried roadless area in which no classified road has been constructed since the area was inventoried."

The definition of "unroaded portion of an inventoried roadless area" should be changed to read: "a portion of an inventoried roadless area in which no classified road has been constructed since the area was inventoried." (Mining Association, Reno, NV - #15907.3110)

Public Concern: The Forest Service should refer to areas with pre-inventory roads as semi-roadless areas and clarify how they will be affected by this rule.

Page S-6: Under inventoried roadless areas: The criteria used for RARE II allowed some areas with roads to be inventoried as "roadless." Therefore some areas contain these pre-inventory roads. Shouldn't they be called semi-roadless areas? What percentage will be allowed under the criteria? Are we to assume the roads will be decommissioned? (Individual, Carson City, NV - #669.33500)

Public Concern: The Forest Service should not designate roadless areas which contain 2477 rights of way through them.

Some of the roadless areas (back country prescription) have 2477 rights-of-way thru them. These areas are not roadless. (Individual, Vila Grove, CO - #8453.71110)

Public Concern: When delineating roadless areas, the Forest Service should classify temporary roads as roads.

One flaw with the Roadless Area Conservation Plan is that temporary roads were not counted as roads when setting up these roadless areas That has the effect of making the roadless areas quite large. If indeed these areas are to be included in the Roadless areas then the use of temporary roads to extract timber, etc., should not be prohibited as they were not considered roads in the original definition. You cannot have it both ways by first saying they are not roads and then saying that building a temporary road is prohibited because it is a road. Either the roadless areas considered should be drastically reduced or the use of temporary roads should be an allowed activity. People like it when people or their government are consistent in their terms. If you want to keep or maintain trust then you have to be consistent. (Individual, Gilbert, MN - #3539.32100)

Public Concern: The Forest Service should include historic roads in its roadless area inventory.

You talk about inventoried roads--NO GOOD. You only inventoried the ones YOU wish to show. If a road has been there for 125 years but is not on YOUR inventory--then it does not exist. Several old historic roads in our area are NOT on your inventory but yet they were the main route from town to town when the rail line existed. Your

forest plan is full of such deceit and unless you include these historic roads presently used by 4X4s, ATVs, snowmobiles, etc. then your plan is one that should be dealt with by Congress. (Individual, Buena Vista, CO - #3536.64421)

Public Concern: The Forest Service should include all existing roads and 4-wheel drive routes in the roadless area inventory.

Have all existing Forest Routes been included in the Inventory of Roadless Areas? Have all Roads and 4 Wheel Drive Routes shown on most recent USG Topographical maps been included in the Inventory of Roadless Areas? (Individual, No Address - #6301.71300)

Public Concern: The Forest Service should recognize the existence of trails less than 50 inches wide.

The proposed rule does not recognize the existence of any vehicle path less than 50" wide. Yet most motorcycle trails, and nearly all of the best (and most environmentally sensitive) ones are single tracks, generally about 12" wide. Other roads, such as old logging and mine roads, are ignored simply because they were established by someone other than a government employee and do not carry an official route number. This does not make them any less used by, or less useful to, the off road recreationist. (Timber Company/Association, Rapid City, SD - #15900.64421)

Public Concern: The Forest Service should clarify whether decommissioning or obliterating roads would create a roadless area.

Does decommissioning roads create, or could it create a roadless area? (Individual, Pocatello, ID - #2959.84610)

The entire analysis is flawed because it does not take into account roadless areas that will be created in the future. For example, on the Deschutes National Forest from 1994 through 1999, 159 miles of road were obliterated while only 5.9 miles of road has been constructed. In other words there has been a net decrease in total road miles (and therefore increase in roadless acres) since 1994. (Individual, Bend, OR - #735.70000)

The Forest Service needs to clearly explain how it intends to treat previously roaded lands where road closures and substantial revegetation may have restored the functional appearance of roadless conditions. (Individual, Columbia Falls, MT - #9957.64420)

Public Concern: The Forest Service should consider for roadless designation, areas with a few roads that could be blocked or obliterated.

The EIS should say that national forests in the U.S. contain an estimated 380,000 miles of roads. Areas with a few roads that could be "put to bed," that is gated, disked, planted with locally native plants and then obliterated, should be considered roadless. (Individual, Bakersfield, CA - #974.63000)

Public Concern: The Forest Service should not allow "ghost" roads to disqualify an area as roadless.

I am also concerned about the possibility that roadless areas could be disqualified from protection due to the presence of unclassified "ghost" roads. I am pleased that the draft policy specifies that portions of inventoried roadless areas will be omitted only when a "classified road has been constructed" since the past inventory (p. A-27).

The final rule should make it clear that the existence of user-created and other unclassified roads is not an appropriate reason to remove a roadless area from the inventory. (Individual, Davis, CA - #9458.71300)

Public Concern: Areas with primitive roads, jeep trails, or classified roads should not be disqualified from roadless designation.

Primitive roads, jeep trails, and “roads” which exist mainly on a map somewhere (“classified roads”) should not disqualify areas from the very appropriate environmental protections Chief Dombeck and the President have envisioned for our national forests. (Individual, San Diego, CA - #25303.64400)

Public Concern: The Forest Service should clarify the status of “phantom roads” to ensure that road construction could not be performed under the guise of repairing existing roadways.

That is, under the Forest Service's preferred alternative 2-b, if I understand it correctly, the area by these “phantom roads” can be logged, and could not be considered a “roadless area”. The status of these “phantom roads” needs to be clarified to ensure that road construction work could not be performed under the guise of repairing existing roadways. (Individual, Fayetteville, AR - #15439.32100)

Public Concern: The Forest Service should explain how the roaded portions of inventoried roadless areas will be delineated.

The rule proposes that road building will be prohibited in currently unroaded portions of inventoried roadless areas. How will the portions that have been roaded be determined? Will the road and/or cut blocks be the boundaries? If not, what method will be used? (Individual, Missoula, MT - #1142.63000)

Public Concern: The Forest Service should consider removing areas that cannot be harvested with temporary roads from the roadless area classification.

In those areas that cannot be logged with the use of temporary roads then one consideration should be to remove it from the roadless area classification so that permanent roads can be built. (Individual, Gilbert, MN - #3539.63000)

Public Concern: The Forest Service should discontinue the use of the term roadless to describe areas which contain forest products.

Consider discontinuing use of the term “Roadless” to describe areas that contain forest products necessary for the future operation of our industry as well as our community’s recreational roads and trails. (Timber Company/Association, East Lansing, MI - #1043.64220)

Public Concern: The Roadless Area designation should be eliminated.

The Roadless Area designation should be eliminated. It does nothing but place constraints on resource uses, planning and management efforts while taking commitment of funds that could be better used. (Individual, Pueblo, CO - #2884.61300)

A combination of A and B alternatives is the most acceptable. Alternative B would be the best, if the word "protect" was replaced with the word "managed," for the following reasons: forest land use plans and subsequent project plans should consider all natural resources available and their relative value whether tangible or intangible. Economic values and effects on local communities must be factored into any decisions made. If objectively done, this leaves no need for roadless designation. Such designation just presents a road block in the decision making process. The Forest Service has inventories of all known natural resources on each national forest. Also, there are inventories of soils, geologic and fire hazards. These indicate the uniqueness of just about every locality. This uniqueness should be considered in every action proposed. It is impossible to capitalize on this uniqueness if the land is encumbered by superfluous designations on a national basis. (Individual, Pueblo, CO - #2884.61300)

4.10.3 Wilderness and National Monument Designations

The designation of wilderness continues to be a contentious issue in this nation. Responses to the Draft EIS reflect this reality. Several respondents note that the document contains seemingly contradictory statements regarding the possible future designation of roadless areas as wilderness areas. These people would like the Forest Service to be consistent on this issue. Proponents of wilderness, ignoring these perceived inconsistencies, request that the Forest Service judge each roadless area independently on its own merits for wilderness designation.

Other wilderness proponents exhort the Forest Service to manage all roadless areas so as to protect their eligibility for wilderness designation. Taking this concept further, several respondents request that the Forest Service designate and maintain all remaining roadless areas, including the Yaak Valley in Montana, the Tongass National Forest, roadless areas in Idaho, as well as estuaries and wetlands, as wilderness in perpetuity.

Fearing that roadless areas will be developed while awaiting assessment, some respondents urge the Forest Service to quickly assess lands that qualify as wilderness. "The area of national parks and wilderness should increase as the population does," according to one constituent. The Forest Service should designate wilderness areas in response to population increases, according to this individual.

Responding to a tangentially related concern, one person believes that the proposed rule "should provide guidelines and policies that would require that forest plans be based on principal river and tributary drainage areas rather than existing political boundaries." Seeking clarification regarding wilderness designations, another respondent wonders whether stewardship activities and temporary roads would disqualify an area from potential wilderness designation.

"I like the idea of protection without necessarily designating an area as wilderness, because that leaves the areas open to a greater variety of possible recreation," according to one Montanan. The Forest Service should consider designations other than wilderness, this person proffers. More specifically, one citizen requests that the Final EIS recommend to the President that all roadless areas be designated national monuments.

Not all the comments regarding wilderness designation come from proponents of such classifications. The Forest Service should postpone the wilderness recommendation process until the next round of forest plan revisions, 15 years hence, "because it would be too confusing and overwhelming to do both [wilderness and roadless/unroaded evaluations] along with trying

to evaluate ecological systems," according to one constituent. Claiming that additional wilderness areas would "restrict access of public lands to the citizens of America," several respondents demand that the Forest Service not attempt to designate any more wilderness areas.

Public Concern: The Forest Service should be consistent in statements regarding the possible future designation of roadless areas as wilderness areas.

The document is peppered with contradictory statements from one section to another. "...roadless and other unroaded areas...are still the reservoir for future designated wilderness areas." However, page 2-17 concludes that the alternative of "Recommend All Inventoried Roadless Areas for Wilderness Designation" was eliminated from further consideration because "Most of the inventoried roadless areas in question have already been evaluated for wilderness in the land management planning process and it was determined for various factors that those areas should not be designated as wilderness." (County Elected Official, Sheridan, WY - #16187.31300)

Public Concern: The Forest Service should judge each roadless area independently on its own merits for wilderness designation.

Each area should be judged independently and separately on its own merits for wilderness designation. (Individual, Carson City, NV - #2343.64230)

Public Concern: The Forest Service should manage all roadless areas so as to protect their eligibility for wilderness designation.

It should be mandated that all roadless areas be managed to protect their eligibility for wilderness designation. (Individual, Missoula, MT - #831.64411)

We wish that the unclassified roadless lands, especially in Montana's Rocky Mountain Front were managed just like wilderness areas. (Individual, Choteau, MT - #10389.64150)

Public Concern: The Forest Service should designate and maintain all remaining roadless areas as wilderness in perpetuity.

With so little water and land left for habitat preservation, we recommend the most restrictive use of all roadless [areas]. We recommend that all remaining roadless areas be designated and maintained as wilderness in perpetuity. (Individual, No Address - #318.64411)

Create more and larger wilderness areas. (Individual, Naperville, IL - #204.64411)

YAAK VALLEY

Please keep the last remaining roadless land in the "Yaak Valley" as they are, roadless, forever, with a wilderness designation. (Individual, Saint Paul, MN - #1688.64411)

TONGASS NATIONAL FOREST

The Tongass national forest should include 8.5 million acres designated as permanent wilderness today. Delaying this rule will allow a future administration to ruin that forest. (Individual, Woodinville, WA - #21.64411)

IDAHO

I support the designation of wilderness lands in the state of Idaho. It is clear to me at this point a government intervention is needed to secure these lands as private citizens and business are not able to envision the land as wild and wish only to see it for the profit they can take. As I wander the mountains of Idaho, it is clear to me from areas that have been clear cut by logging companies and mines that have been left behind and still are intact are simply the result of companies seeking immediate profits and not companies that peer into the future to realize that others may choose to use the land. It is obvious to me that businesses and profit takers cannot legislate themselves for an outcome that would benefit all society. (Individual, Boise, ID - #9730.41000)

ESTUARIES AND WETLANDS

Please continue to set aside roadless and wilderness areas, including estuaries and wetlands. (Individual, San Diego, CA - #8824.64411)

Public Concern: The Forest Service should quickly assess lands which qualify as wilderness.

I urge you to more quickly assess lands in your jurisdiction that qualify as wilderness so they are [not] developed while awaiting assessment. (Individual, Ithaca, NY - #7538.64411)

Public Concern: The Forest Service should designate wilderness areas in response to population increases.

I…think the area of national parks and wilderness should increase as the population does. At this point, I think we are in a position where we need more, not fewer areas where we can 'get away from it all.' (Individual, Mc Kees Rocks, PA - #3389.64411)

Public Concern: The Forest Service should use watershed boundaries to delineate roadless areas.

The rules should provide guidelines and policies that would require that forest plans be based on principal river and tributary drainage areas rather than existing political boundaries. (Individual, Minnetonka, MN - #44235.64251)

Public Concern: The Forest Service should clarify whether stewardship activities and temporary roads would disqualify an area from potential wilderness designation.

The suggestion that stewardship logging be allowed in certain roadless areas and that temporary roads be built into these roadless areas to allow stewardship logging has raised the concern that these activities may disqualify the roadless areas from potential wilderness designation. This subject should be discussed in the Final EIS, but presumably these activities would not disqualify the roadless areas from this potential designation. Limited roading activity and logging in the past has apparently not disqualified such areas, as described at page A-9 of the DEIS Summary and proposed rule. (State Elected Official, Salem, OR - #18661.64411)

Public Concern: The Forest Service should consider designations other than wilderness.

I like the idea of protection without necessarily designating an area as wilderness, because that leaves the areas open to a greater variety of possible recreation, such as mountain biking. (Individual, Helena, MT - #9711.10100)

Public Concern: The Final EIS should recommend to the President that all roadless areas be designated national monuments.

The final EIS should recommend to the President that all roadless areas—including the ones the inventory purposely ignored and those on the Tongass National Forest—be designated National Monuments without logging, road building, mining claims, mineral leases, grazing or motorized and mechanized vehicles. The other citizens of the nation, grizzly, wolverine, bull trout, and salmon, deserve the few remaining wildlands. That is their home. (Individual, No Address, - #14717.64150)

Public Concern: The Forest Service should postpone the wilderness recommendation process until the next round of forest plan revisions.

If a re-evaluation of inventoried roadless areas and unroaded areas is to be required in the upcoming Forest Plan revision, then I recommend that the required wilderness recommendation process be postponed until the next round of Forest Plan revision (15 years hence). This is because it would be too confusing and overwhelming to do both along with trying to evaluate ecological systems. (Individual, Libby, MT - #16714.64250)

Public Concern: The Forest Service should not attempt to designate any more wilderness areas.

I urge you to support no more wilderness designation and urge President Clinton not to issue any further decrees that would restrict access of public lands to the citizens of America. (Individual, Las Vegas, NV - #926.64412)

Already, one third of U.S. forest land, 247 million acres, is permanently set aside in national forests, wilderness and other areas never to be harvested. More “Wilderness Areas” reduces the amount of land available for multiple use and lessens the public access to recreation, wood and other resources. (Business, Ewen, MI - #949.64412)

Chapter 5 Environmental Effects

This chapter covers public comment concerning the potential biological and physical environmental effects of the proposed rule. These comments are divided into 15 sections: 5.1 General Environment; 5.2 Forest Health; 5.3 Weeds, Insects and Disease; 5.4 Fire; 5.5 Biodiversity; 5.6 Vegetation; 5.7 Wildlife; 5.8 Habitat; 5.9 Connectivity and Fragmentation; 5.10 Aquatic Wildlife; 5.11 Threatened and Endangered Species; 5.12 Watersheds; 5.13 Soils; 5.14 Air Quality; and 5.15 Global Effects. Some sections contain additional subdivisions including Pollution, and Environmental Preservation under General Environment.

5.1 General Environment

The environmental value of the roadless areas and the way in which they should be managed is a topic eliciting a range of comment from the public. According to several respondents, the Forest Service should consider the ecological value of roadless areas. It is the opinion of one business that roadless areas lack “the ecological values needed to warrant long-term preservation,” while others claim the forests and roadless areas retain environmental values. An individual from California claims studies show roadless areas are valuable for inhibiting undesirable environmental processes linked to habitat fragmentation, while another feels retaining forests in a natural condition will ensure a balance between developed and forested lands. An additional environmental value cited by an individual from Vermont is the ability of the forests to prevent acid rain.

The Forest Service should include humans as an inextricable part of the ecosystem according to some. These respondents believe human resource needs and existing impacts on the ecosystem make it impossible to remove man and his activities from the forest environment. In related concerns, a number of comments include recommendations the Forest Service reconsider the historic range of variability, particularly with regard to fire frequency, as a viable management goal. One respondent calls the goal absurd due to the legal and practical limitations of such things as the urban interface and clean air laws. Others feel the Forest Service is operating under the mistaken assumption that the pre-European environment was static. The dynamic nature of the environment, according to one county agency, precludes any accurate judgment regarding the “most stable and productive condition” of the land. An individual from Colorado believes the management proposals do not take into consideration the dynamics of community evolution, which supports different suites of organisms at different stages, and so may not be in the best interests of some endangered species.

There are several suggestions the Forest Service develop plans for managing large-scale disturbances in roadless areas including catastrophic fire and flood events. One county official suggests the Forest Service should address long-interval fire regimes and their often catastrophic nature. The same county official points out that only in the No Action alternative does the Forest Service address precipitation and runoff events, and recommends including the discussion in all alternatives. Conversely, there are several suggestions the Forest Service consider creating

environmental buffer zones to shelter roadless and wilderness areas from actively managed forest. One respondent, however, takes the Forest Service to task for implying that roadless areas may serve as wilderness buffers, and contends the agency must delete any discussion and reference to buffer zones around wilderness.

In addition to these general concerns, respondents also address Pollution, Subsection 5.1.1; Environmental Preservation, Subsection 5.1.2; Effects of Other Activities on the Environment, Subsection 5.1.3; and Adequacy of the Environmental Analysis, Subsection 5.1.4.

Public Concern: The Forest Service should consider the ecological value of roadless areas.

ROADLESS AREAS LACK ECOLOGICAL VALUE

The President's Northwest Forest Plan allocated only 3 of 24 million acres for the sustained production of forest products. No further lands need to be set-a-side for ecological purposes.
The President's Plan was the last of five different reviews of these areas which found them lacking in the ecological values needed to warrant long-term preservation. (Business/Business Association, Petersburg, AK - #7542.72230)

ROADLESS AREAS HAVE ECOLOGICAL VALUE

…I have read many studies that have found direct links between habitat fragmentation and several undesirable processes, including the loss of pollination mutualisms, the establishment of invasive plant species and the reduction in the home ranges of charismatic megafauna considered important by the public as a whole. The preservation of wilderness areas is thus of great ecological importance in addition to being important in our western aesthetic and ethical system. (Individual, Mystic, CA - #8132.83000)

FORESTS PREVENT ACID RAIN

You probably know that trees absorb greenhouse gases which in turn PREVENTS ACID RAIN. ACID RAIN DOESN'T JUST FALL ON TREES - IT ALSO FALLS ON OUR CROPS SLOWLY DEVITALIZING THE CROPS AND THE SOIL THAT THEY ARE IN. (Individual, Colchester, VT - #7279.90000)

FORESTS IN A NATURAL CONDITION PRESERVE ECOLOGICAL BALANCE

With our American landscape becoming more and more crowded with the activities of a growing population, keeping these national forests in a pristine, natural condition will ensure more ECOLOGICAL BALANCE between the open and the naturally forested spaces. (Individual, Chattanooga, TN - #11352.83000)

Public Concern: The Forest Service should include humans as part of the ecosystem.

I implore you...What would a lion be, without his claws? A peacock without it's feathers? An anteater without It's tongue? Or a cheetah without it's speed?
OUR human advantage, in this world, is our brains! It's what's given us the capacity to even invent Bulldozers, jeeps, cars +ATV'S. C'mon! , Think! ! ! ! ! ! !
You act as if humans are an alien plague upon this planet.
I KNOW! ! ! Let’s de-claw the lions, to save the zebras! Let’s snip the anteater's tongue to “save the ants”, Let’s clip the Achilles tendon of the cheetah to save the antelope...Better yet! ! ! Let’s deny that humans can think! ! ! And, are inquisitive. And inventive. LET'S HATE HUMANTIY, AND THEIR DAMNED ATV'S AND THEIR LUST FOR WOOD PRODUCTS, AND THEIR RAPE OF THE PLANET! ! !

Your philosophy is based on a hatred of mankind, can't you see that?? Hate the lion for his claws and jaws--hate mankind for his brains. We belong on this Earth just as much as all other life. I'm sad that the only species that you hate, is your own. (Individual, No Address - #6963.90000)

Environmental scientists often leave out an integral component of the ecosystems they want to protect: People. The human being has not yet been invented that can exist without consuming natural resources. Humans are a part of the earth's ecosystem and cannot arbitrarily be separated from it. People harvesting timber to erect shelter is just as "natural" as beavers building dams and birds building nests. Any public forest management policy must include people and their natural resource requirements. (Individual, Bend, OR - #5725.90000)

Bio-diversity is indeed an important issue and protecting what is left of our public lands is crucial. Trying to remove humans from bio-diversity is not realistic or practical. We must remember like it or not, humans have already drastically changed our environment and the only chance we have of having bio-diversity is through education. People are an important factor and will always be part of bio-diversity. We must protect the lands for the people and not from the people. (Individual, Van Nuys, CA - #2728.83400)

Public Concern: The Forest Service should reconsider the historic range of variability as a viable management goal.

We cannot, nor should we restore our National Forests to Pre-Columbian condition. We must return to a balanced multiple use concept. (Individual, Tucson, AZ - #18183.21000)

This action is predicated on the discredited concept of "estimated historic range of variability (based on conditions prior to European settlement) (pg. 3-21)." This concept is based on the unfounded idea the ecological conditions prior to European contact were stable and ideal. This paradigm begs the question of what is the most stable and productive condition of public lands. It is influenced by nostalgia and the 19th Century concept of the noble savage living in harmony with the land. Science has little to do with the underlying assumptions. This concept will undoubtedly fall aside in time like the paradigm of the "super organism," the popular old-time notion that forest stands induced rainfall, or the popular notions about fire suppression. The problems created in the meantime may vastly overshadow those caused by fire suppression. (County Agency, Pahrump, NV - #16093.82000)

DUE TO LEGAL AND PRACTICAL LIMITATIONS

The obsession of many people in the upper echelons of the Forest Service with pre-European conditions for the National Forests is absurd. There were no mandates for clean air nor physical threats to that society and it's infrastructure during those times. If a forest fire raged for several months no one cared except for the story-tellers who spoke of days without sun. The frequency rate for fires was high in dryer environments and fuel builds-ups were low because there weren't any of these consequences and they were free to burn. Do you seriously believe that we have the where-with-all to replicate these fire frequencies? I think not. You haven't disclosed this in your document and you must. (Individual, Naches, WA - #28371.82000)

DUE TO THE DYNAMIC NATURE OF THE HISTORIC ENVIRONMENT

Alternatives other than #1 presume that ecological and biological communities are static while in reality they are very dynamic. Some rare, endangered or threatened species depend on given stages of ecological evolvement. When the community evolves, those species will disappear with it. Old growth timber and dependant species is a good example of this. What happens to the dependant species with the old growth stands pass from existence? (Individual, Pueblo, CO - #2884.81000)

Public Concern: The Forest Service should develop plans for managing large-scale disturbances in roadless areas.

The more land that is managed in an "unmanned" condition, the more often these natural or man-made disasters will happen. The recent huge fire near Los Alamos, NM, is simply one example of what is going to happen with increasing frequency as use of prescribed fire increases. I have used enough prescribed fire, and fought enough fires to know that when you've got a large burn going, anything can happen. The more unroaded areas we have, the fewer firebreaks we have. The larger the roadless area, the more difficult and costly it becomes to fight it because of poor access. (Individual, Philipsburg, MT - 9369.84200)

As ecologists have finally come to accept, disturbance is a very real part of forest growth, development and demise. The forests in the roadless areas are all products of disturbance of one kind or another, often fire. I wonder how you plan to or if you plan to protect those forests from catastrophic disturbances. (Individual, Albany, OR - #5675.80000)

LONG-INTERVAL FIRE REGIMES

Size Considerations Comment: Page 3-66, first paragraph-- This section on Size Considerations, and other sections, addresses that stewardship activities can have local beneficial effects to ecosystem health and biodiversity. However, the discussion always focuses on the benefits of reducing fire intensity in Ponderosa Pine forests and never addresses the impacts of long-interval fire regimes that make up a significant amount of the forests--particularly in the West. Fire intervals in these Lodgepole Pine forests are 100 years or more and naturally catastrophic as witnessed during the 1988 fire season. These events are not conducive to increasing the survivability of large, old growth pines, reducing mortality from moisture stress, or reducing outbreaks of insects and diseases. Relief: The Forest Service must address long-interval regimes and disclose how they intend to reduce the threat of catastrophic fires. Only one side of the fire interval regime (short-interval fires) is evaluated in the entire document. (County Elected Official, Worland, WY - #16185.84100)

CATASTROPHIC PRECIPITATION AND RUNOFF EVENTS

Comment: Page 3-32, last paragraph-- The discussion on risk of precipitation and runoff events is only included in the “No Action” alternative. This discussion is not included in other alternatives. The discussion, itself, fails to address the probability of precipitation and runoff events, e.g., 10 year, 100 year, or 1,000 year events. This information would lead to an objective discussion of the probability of these events and possible impacts from the “Action Alternatives”. Relief: The Forest Service must evaluate the probability of these natural events and provide an objective discussion for all alternatives. (County Elected Official, Worland, WY - #16185.83130)

Public Concern: The Forest Service should consider the use of environmental buffer zones.

AROUND ROADLESS AREAS

The final points I wish to make are to emphasize the importance of future management for the lands immediately adjacent to designated roadless areas and the relationship of roadless areas to other ecologically intact portions of their landscape. It is absolutely critical that these roadless areas not become isolated ecological islands surrounded by a sea of intensively managed lands. An integral part of the future management of these landscapes must include appropriate attention to and management of ecological buffers surrounding each roadless area and extending outward for at least one kilometer in all directions from the roadless area boundaries. (Environmental/Preservation Organization, Bend, OR - #6724.21000)

USE ROADLESS AREAS AS BUFFER ZONES ADJACENT TO WILDERNESS

Establishing roadless areas adjacent to the BWCAW enables us to provide a "Transition" zone between wilderness & non-wilderness areas, thereby lessening the impact of non-wilderness activities, such as logging & motorized use, on the wilderness itself. (Individual, Boulder, CO - #13302.90240)

DELETE ANY DISCUSSION AND REFERENCE TO BUFFER ZONES AROUND WILDERNESS

Page 3-137, fourth paragraph--Even though the document contains a disclaimer at the bottom of Page 3-137 regarding buffer zones around wilderness, the argument presented for preserving roadless areas looks, smells, and sounds like a buffer zone. The text states, "These areas (roadless) serve as a natural transition between lands affected by resource management activities and lands affected substantially by natural processes" and "...the additional distance from intense management activities provides more opportunities for natural processes to occur uninterrupted" supports the idea that they are being supported as buffer zones.
Relief: The Forest Service must delete any discussion and reference to "buffer zones around wilderness. Many state wilderness acts also prohibit the management of surrounding areas as "buffer zones" to further protect wilderness. (County Elected Officials, Worland, WY - #16185.90240)

5.1.1 Pollution

Peace and quiet is considered not only an environmental, but also a human requirement in the forest, according to a number of people. They assert the Forest Service should control noise pollution on system lands by prohibiting road building and restricting off-highway vehicles (OHV) use. Forest users also address other sources of pollution. The problem of litter left by recreational users is a priority concern to many. The public offers a range of proposals to solve the backcountry litter problem, including forest user financed litter management. Some writers believe the motorized community is largely to blame for the litter problem, and recommend reducing road access and limiting motorized use of the backcountry. However, there are those who contend the problem has reached a point where non-motorized users cannot pick up the volume of garbage accumulating in the backcountry, and motorized users should retain access because they can remove large quantities of trash.

Public Concern: The Forest Service should address the litter left by recreational users.

THROUGH USER FINANCED LITTER MANAGEMENT

I think that trash receptacles should be distributed around, and tied down, in all popular places, and financed by private “Environmentalist” clubs and other private citizens who use the forest and other public grounds (entrance fees or other means). [They should be] encouraged by a public (federal) campaign to be responsible for the private citizens who use the public lands for whatever reason, to remove their own trash and fix their own booboos to the land and equipment. This is to be enforced by peer pressure, education, and rewards, and in severe cases by law enforcement officers. (Individual, No Address, #2416.93642)

BY REDUCING ROAD ACCESS

The amount of litter, trash, and human waste need to be brought under control and I feel that with less roads into the back country this can be accomplished. (Individual, Victorville, CA - #6004.81000)

BY LIMITING MOTORIZED USE OF THE BACKCOUNTRY

I'm out backpacking and hiking/camping a lot in the Kaibab Forest of northern Arizona, and many of the areas of the Dixie National Forest and you can hear the ORVs from miles and miles away and unfortunately--where they go it seems to leave lots of evidence of their travels with them; beer and pop cans, misc. trash, targets for shooting practice. Not to mention just the constant roar of their motors running non-stop. (Individual, No Address - #1182.91500)

We are in favor of the ban of snowmobiles (and 4-wheelers) in national parks…As users of national parks and forestlands in the West and Midwest, we consistently observe disruption of property, the environment, and people by users of these machines. As an example, we recently walked several miles of a snowmobile trail in the Superior National Forest near our cabin on the edge of BWCA. We hauled out four bags of trash (all we could carry…there was more) that had accumulated over the winter. We have seen this repeated wherever we have walked the trails. (Individual, Shoreview, MN - #1498.91612)

BY ALLOWING MOTORIZED USERS TO CLEAN UP THE BACKCOUNTRY

I'd like to note that I and my friends always leave a clean campsite, and because we have vehicles, we are able to haul out the trash left behind by others. I think that this is an important note. Because we have vehicles, we are able to haul out other people's trash, trash that backpackers simply wouldn't be able to pack out. Because we have vehicles, we are able to leave the lands in their unspoiled state, and improve upon the lands by removing trash. (Individual, Gardena, CA - #1755.44020)

Public Concern: The Forest Service should control noise pollution on system lands.

In addition to the invaluable benefits for wildlife habitat, water & air resources, it's becoming more apparent all the time that the peace, quiet, and silence found in these areas is respectfully becoming an endangered resource. (Individual, Big Fork, MT - #5797.90220)

BY PROHIBITING ROADBUILDING

It took nearly 3 miles of climbing to escape the sound of traffic since the roads encroach so heavily into the mountains. Several hikes are never silent. This is profound for the recreationalist who seeks refuge from the modern world, but it is far more profound for the many species who depend on hearing calls of a possible mate, or the oncoming predator. Please stop all future roadbuilding. (Individual, Leverett, MA - #5075.90200)

Please, leave our remaining roadless areas as they are. There are almost no places left on earth where I can even imagine true peace and quiet. Every day technology results in yet another way to generate ear-assaulting noise. And with each new gadget, the decibel of sound pollution rises another notch or three.
As an ornithologist, it is my job to study birds. The work entails much listening--often the only means of "seeing" and counting birds. But the air often fills with so much human-generated racket that I cannot hear nature's voices at all.
Even deep in our national forests, my hearing is harassed by stereos, TVs, video games, and now cellular phones. Shooting and generators further erode my auditory nerves. And then the snowmobiles, dirt bikes, RVs, SUVs, and ATVs all grind away at the inside of my head as well as the landscape. They shatter opportunities for bow-hunting, hiking, back-county skiing, watching wildlife, or just seeking solace. Build a forest road, and the raid against peace and quiet will follow. Some people adjust to the loss of quiet by forgetting how to listen. Others descend into a dark fear of quiet, which they push away by turning up the volume. Then there are those of us who desperately seek asylum from the tyranny of road-induced noise. (Individual, No Address - #6307.90200)

BY RESTRICTING OFF-HIGHWAY VEHICLE USE

Besides the physical and environmental impacts of allowing ATV's in forest areas, they also cause considerable noise and annoyance to others who wish a quiet outdoor experience. (I doubt if the animals like them either.) (Individual, Duluth, MN - #5243.90220)

My main concern with motorized activities is actually the loud sounds that they produce, and the very pervasive disturbing effects they have throughout the forest, not only on the humans that visit the forest, but [also on] the wildlife that lives there and depends on various forms of communication. These forms of communication are disrupted by the loud engines of many of the vehicles that are taken back into our forests. (Individual, No Address - #21170.83500)

5.1.2 Environmental Preservation

The Forest Service should preserve roadless areas for environmental reasons, a number of respondents claim. One cites the rapid encroachment of development on open space, and the increasing value of the ecosystem services roadless areas provide. Another supports the protection the proposed rule provides to geographically limited plant and animal populations. A third supports permanent protection for roadless areas as viable examples of wild unroaded ecosystems, which are becoming increasingly important as global warming increases. Other writers endorse protecting a wide range of ecosystem types and elevations, particularly in the lower and middle elevations, which are at the greatest risk of exploitation. This includes the low elevation old-growth forest of the Tongass. One individual endorses an "Alternative 5," which prohibits road building, motorized use, and extractive industry, as the most effective way to preserve wild areas.

Public Concern: The Forest Service should preserve roadless areas.

FOR ECOSYSTEM SERVICES

You have a great responsibility and I would hope that you feel that you represent me and thousands of other people like me, not just those who can throw money and power around. Every time I see another patch of woodland bulldozed, another pond or water area filled in, another farm turned into a housing development, I shake my head in amazement. Don't people realize that our air, clean water and food supply depend on these areas? Are they so crazed with greed that these people can't think straight?
I realize that there are people who are afraid of natural environments, just as there are others who are afraid of city streets. There are those who don't think about food having to be grown somewhere before they buy it off a shelf. But I trust that you have a greater awareness of life on this planet. (Individual, Whiting, NJ - 5620.41200)

FOR ECOSYSTEM HEALTH

I want to express my approval of the proposed Roadless Area Rule primarily for the fact that it will provide extra needed protection which is important to the health and well-being of ecosystems both here in western North Carolina and elsewhere in the nation.
Considering our area, it is a center of evolution and the home of a large variety of plants and animals, many of them unique to this area.
From a human perspective, it is the variety of local ecosystems which makes this one of the best places in our country for living. In addition, the area is an important source of water for the region and is important for its role in regional weather control. (Individual, Brevard, NC - #7376.83000)

AS VIABLE EXAMPLES OF WILD UNROADED ECOSYSTEMS

Among the reasons for permanent protection for these areas, is to provide viable examples of wild unroaded ecosystems for an unpredictable future -- a future of climate change. Global Warming is a factor now at play in our decisions which put at-risk habitat for threatened and endangered species. (Individual, Yoncalla, OR - #7214.85100)

Public Concern: The Forest Service should protect a wide range of ecosystem types and elevations.

An important criteria in the wilderness preservation process should be to include areas representing a wide range of life zones, elevations, geology, and ecosystems. Unfortunately, very little of our low and middle elevation areas in the West remain in a pristine state. Those that do exist need permanent protection as quickly as possible. (Individual, Boise, ID - #380.80000)

When these timber barons speak of an 'excessive amount of wilderness' they are talking about pure acreages. As I'm sure that you know, if you examine the forest protected by wilderness status, these for the most part are high elevation forest – alpine, and not considered valuable commercial timber. (Individual, Neosten, OR - #392.83422)

Only 4% of the remaining Tongass roadless landbase encompasses low elevation, large old growth forest most important to fish and wildlife, and now the greedy timber industry wants this too! (Individual, Sitka, AK - #1083.83422)

Public Concern: The Forest Service should consider "Alternative 5" as the most effective way to preserve the wild areas.

It would be wise to heed the words of men like Muir and Thoreau before there is no wild land left. Walking through a forest, listening to a mountain stream, observing wild animals in their normal habitat are some of my fondest memories. Will future generations experience wildlife only in zoos? Will captive breeding be the only way many animals are allowed to exist? We should set aside areas that do not have roads, where mining, logging and the internal combustion engine are not allowed. The existence of the human race may depend on these wild areas free from pollution where native plants and animals can continue to survive. Please, consider "Alternative 5" as the most effective way to preserve the wild areas we still have. (Individual, Santa Barbara, CA - #9216.92300)

5.1.3 Effects of Other Activities on the Environment

There are some who believe the roadless initiative is incorrect in its conclusion that "human activity is detrimental to the health of the ecosystem." One feels managed forests are responsible for the healthy populations of large game, and for the rebound in wolf and coyote populations. Roads and active management are the only way to improve forest health and promote awareness of, and caring for the resource, according to this individual. Another person challenges the Forest Service to prove that minor road construction adversely impacts fish habitat, and that nitrogen from gasoline engines adversely effects the environment. There are others who feel very differently, encouraging the Forest Service to address the negative effects of road construction and other management and extractive activities on the forest environment. One individual believes the Forest Service should address the impacts of building roads on small sized ecosystems. Another feels the Forest Service should address the impacts of cattle on springs, streams, and native grasses from overgrazing and overstocking.

Public Concern: The Forest Service should consider the benefits of human activity to the ecosystem.

I oppose the roadless initiative on its assumption that all human activity is detrimental to the health of the ecosystem. The forests are overrunning with deer, elk, mountain lions, and black bear thanks to the intervention of humans. Wolves and coyotes are starting to make a comeback too. Construction of firebreaks prevents the spread of disastrous wildfires. Logging and grazing can be used to manage the health of the forests and prevent the spread of fires too. Controlled burns and cutting are needed to prevent the spread of noxious weeds and pine-beetle infestations. These management practices will be significantly more difficult and costly without the ability to construct roads. Human activity is beneficial in another way too: people who recreate, rejuvenate, and volunteer in the National Forest also tend to care greatly about the health of the forest, their access to the forest, and indeed, even the very existence of the forest. (Individual, Fort Collins, CO - #11334.10200)

Public Concern: The Forest Service should explain how nitrogen from gasoline impacts the environment.

Atmospheric emissions are also said to adversely impact the environment.
. . . Provide a reason why nitrogen from gasoline engines adversely impacts the environment. (Individual, Twain Harte, CA - #1632.83510)

Public Concern: The Forest Service should address the impacts of building roads on small sized ecosystems.

Please consider seriously the impact of building more roads in smaller areas & the deleterious impact on wildlife habitat and smaller eco-systems. (Individual, North Middlesex, VT - #14361.83500)

Public Concern: The Forest Service should consider the impacts of cattle on springs, streams, and native grasses.

I have had the great pleasure of using the Forests all of my life. My family has had range rights for live stock grazing since the 1870's in the San Juan Forest of southern Colorado and still run cattle there. I have personally seen how the cattle have ruined the springs and the stream sides. The over grazing has killed the native grasses in the meadows and now the noxious weeds and thistle are taking over. (Individual, Eugene, OR - #18753.90340)

5.1.4 Adequacy of Environmental Analysis

County officials from Wyoming accuse the Forest Service of being "so biased against roads and timber harvesting that one cannot begin to identify all the discrepancies." They go on to enumerate a list of deficiencies including inadequate discussion of the benefits of active management, lack of quantitative cumulative effects, and use of subjective terminology on the basis of which the Forest Service cannot make reasonable decisions. They conclude the Forest Service should rewrite Ecological Factors in the Draft EIS in an objective manner, providing specific quantitative analysis and evidence. In a related concern, a range organization feels species diversity will be lost, with mature monocultures of fir, lodgepole, spruce, and sagebrush replacing herbaceous species, aspen, and whitebark pine if the proposed rule is implemented.

They also contend increasing the timber and brush component inhibits the water cycle and results in decreased groundwater and instream flows.

The Forest Service should separate the discussion of the effects of roads from the effects of road uses according to one timber industry representative, which requests the Forest Service clearly define road uses and their individual effects. They go on to point out that proper surfacing and low emission vehicles eliminate most of the negative effects listed in the Draft EIS. Others feel the Forest Service needs to provide data supporting and quantifying the negative effects of roads on the environment. One claims the Forest Service has not considered alternatives such as designing roads for minimal maintenance. In contrast, one conservation organization calls the analysis of effects flawed because the proposed rule fails to address the impacts of OHVs on roadless areas and wilderness values, particularly the potential for introducing diseases and invasive non-native species into rare plant habitat. Another two conservation groups request the Forest Service use the best available scientific data to develop plans to manage the environment of roadless areas. One group specifically requests this for uninventoried roadless areas in Region 6 which they identify as an area of global biodiversity importance. The groups promote the use of recent literature to assess the importance of roadless areas and for fire and timber management. They also advocate the use of special geographic analyses, remote sensing, and adaptive management.

One county official believes the identification of reference landscapes and research natural areas represents a duplicate effort intended to justify the proposed action. The official recommends the Forest Service clarify the difference between reference landscapes and research natural areas.

Some view the proposed rule as an opportunity for the Forest Service to engage in research. One individual recommends studying the effects of off-road vehicles by allowing various intensities of use on ecologically similar sites for a fixed period of time and using the resulting data to make management decisions that will protect diversity and ecosystem services while allowing the use of off-road vehicles. A conservation organization recommends using roadless areas as a laboratory to study ambient noise levels on a forest-by-forest basis.

Public Concern: The Forest Service should rewrite the ecological factors section in the Draft EIS in an objective manner, providing specific quantitative analysis and evidence.

Ecological Factors General Comment: This entire section is so biased against roads and timber harvesting that one cannot begin to identify all the discrepancies. The entire section focuses on the negative aspects of roads and timber harvest and rarely addresses the benefit of these activities, such as increased water for municipal use, irrigation, providing access for water related recreational activities, access for fire suppression activities and fuel management, vegetative management, etc. Cumulative effects are rarely quantified. Subjective conclusions are provided, such as small increments, most benefits, lowers the likelihood, increased incidence, slightly increasing, sharp reductions, minimizing, measurable, lower risk, etc. that are essentially meaningless. What do these mean? The Forest Service cannot make a reasonable decision on effects using these subjective conclusions. On the other hand, local government officials cannot adequately interpret these conclusions and determine what effects they may have within their jurisdictions. This provides even more reason for these decisions to be made at the local level where cumulative effects can be quantified. Relief: The Forest Service must completely rewrite these sections in an objective manner, provide a specific quantitative analysis of impacts, and replace subjective evaluations with quantitative evidence. (County Elected Official, Worland, WY - #16185.70000)

Public Concern: The Final EIS should include an analysis of the effects of the proposed rule on species diversification and the water cycle.

LOSS OF SPECIES DIVERSIFICATION AND INSTREAM FLOWS. Roadless and wilderness means no management. In these areas being proposed for roadless in the Targhee and the Beaverhead forests, species diversification is being lost. These areas are becoming mature monocultures of fir, lodgepole, spruce and sagebrush at the expense of the herbaceous species, aspen and white bark pine. We cannot afford to lose this diversification and the action being proposed insures this diversification will be lost. Increase of the timber and brush component of the environment decreases the water cycle due to evapotranspiration resulting in decreased ground water and instream flows. THIS EIS DOES NOT INCLUDE AN ADEQUATE ANALYSIS OF THE PROPOSED ACTION'S EFFECT UPON ALL OF THE ABOVE CONCERNS. (Range/Grazing Organization, Dillon, MT - #26044.83400)

Public Concern: The Forest Service should separate the discussion of the effects of roads from the effects of road uses.

The statement that "roadless areas also have less dust and vehicle emissions, which reduce air quality, elevate human health risks and diminish water quality" is in error. You have defined the scope of this discussion to an area with roads or without a road. The road does not have any of these effects. If you are going to define the discussion beyond just the road to the uses that may occur you need to clearly define what those uses are and how each has an effect. If the proper surface is constructed, and the vehicles using the road are electric or of similar design, use of the road does not have to produce any of the effects listed. (Timber Association, No Address - #52501.83320)

Public Concern: The Forest Service should provide data indicating the negative effect of the road system on the environment.

Not having seen data to support the assertion that the existing road/roadless system is negatively affecting the environment, why then are you suggesting the closure of thousands of our existing roads and trails? Why are you attempting to deprive the motorized recreational public from those same trails? Why would you destroy our natural resource industries--timber, mining, ranching--through the elimination of roads? (Individual, Golden Valley, AZ - #11327.10200)

No data is presented to support the assertion that the existing road system is having a significant negative affect on the environment or to quantify that impact. Neither have they considered alternatives, such as doing the maintenance job and constructing roads to minimize the need for maintenance. Many of those roads are gated, used only to support periodic management activities; many need little maintenance because of good drainage and stable surfaces. This infrastructure was designed to facilitate management, protection and access by the American public. It is needed, sound and, for the most part, a valuable asset for the national forests. (Individual, San Diego, CA - #10547.93610)

Public Concern: The Forest Service should address the effects of off-highway vehicle use on roadless areas and wilderness values.

The analysis of the effects on potential wilderness is also flawed because the proposed rule fails to address ORVs and their impacts on roadless area and wilderness values. At the very least the DEIS must disclose the impacts of ORVs to the public rather than continue its archaic "head-in-the-sand" approach. An example of the huge implication of ORV use in inventoried Roadless Areas is the South Kalmiopsis Roadless Area on the Siskiyou National Forest. The South Kalmiopsis is one of the largest inventoried roadless areas in the nation (105,000) acres), and may also contain the highest concentration of rare, sensitive, threatened and endangered plant species in the nation. The roadless area is currently being impacted by ORV use on old "pre-inventory" mining roads. There

is no NEPA analysis of this use. Its only a matter of time before the increasing ORVs use in the South Kalmiopsis introduces a fatal non-native root pathogen, specific to Port Orford cedar and Pacific yew, and invasive non-native plant species into this ecologically significant roadless area. ORVs also threaten rare plant species and their habitat directly. Most of the South Kalmiopsis Roadless area is directly adjacent to the Kalmiopsis Wilderness adding to its significance as a refugia for rare and sensitive plants and wild salmon and steelhead. (Environmental/Preservation Organization, Cave Junction, OR - #16188.83620)

Public Concern: The Forest Service should use best available science to manage roadless areas.

TO ASSESS THE IMPORTANCE OF ROADLESS AREAS

Attached is a copy of our most recent findings for roadless area conservation in the Klamath-Siskiyou ecoregion. THIS MANUSCRIPT IS CURRENTLY IN REVIEW WITH CONSERVATION BIOLOGY AND WE REQUEST THAT YOU INCORPORATE THE FINDINGS INTO THE FEIS TO PROVIDE FURTHER GUIDANCE TO REGIONAL MANAGERS ON HOW TO INVENTORY AND ASSESS THE IMPORTANCE OF ROADLESS AREAS IN AN AREA OF GLOBAL BIODIVERSITY IMPORTANCE. In particular, we request that this information be used to develop standards and criteria by which roadless areas in Region 6 are managed, particularly the uninventoried areas documented in our analysis. Electronic copies of all relevant databases are available upon request. Further, WWF/DBI is now extending this roadless assessment to the entire Cascade region--from the coastal forests of northern California to the Olympic Peninsula east to eastern Washington and Oregon. (Environmental/Preservation Organization, Ashland, OR - #13522.83400)

FOR TIMBER AND FIRE MANAGEMENT

We recommend that the Forest Service book of instruction for fuels and fire management personnel, called "FIRE WEATHER", Agriculture Handbook 360, should be used as the basis for timber and fuel management decisions. FIRE WEATHER defines the fire prevention conditions of the forest and states the reasons why logging changes the fire prevention characteristics of the forest, increases the chance of wildland fire, increases the flammability of forest fuels and critically influences the behavior of wildland fires. While this science was developed in 1970 through the joint effort of many scientists form the Weather Bureau, Environmental cieces Administration, U.S. Commerce Department and the Forest Service, U.S. Department of Agriculture (USDA), it has been overlooked or ignored as a scientific source of information on the conditions of the forest which should not be removed or changed because their presence will help reduce fire severity. (Environmental/Preservation Organization, Weldon, CA - #16041.82000)

The DEIS fails to assign adequate habitat values of retaining the tree trunks and tree canopy, so they remain in the forest with benefits of habitat, carbon sequestration, oxygen production, soil retention, visual quality and beauty, and the fire prevention values of the forest. Forest Service analysis documents should separately analyze and compare the Cutting, Chipping, and Scattering method and other treatment methods, in addition to logging, for their impacts to the environment, the treasury, and the society, so the public and the decision maker are provided with sufficient information upon which to base their decision. An analysis document that fails to analyze a full range of alternatives provides incomplete analysis and is poor planning. A proposal that recommends increased amounts of logging without separately considering other treatments to reduce forest fuels is only analyzing logging, which is not a full range of alternatives, is not really considering the negative impacts to the environment, is not dealing with the most flammable fuels, and is unacceptable, especially when the timber harvest program annually reduces the area useable for recreation and wildlife habitat by thousands of acres, annually costs the American taxpayers $1.2 billion dollars, and increases wildfire intensity and severity. (Environmental/Preservation Organization, Weldon, CA - #16041.82000)

FOR GEOGRAPHIC AREA ANALYSIS

We recommend that the sub-watershed geographic analysis scale necessary to accurately sustain and enhance the forest ecosystem should be defined as the topologically sensitive submicroclimates made up of a "mosaic of

topoclimates", consisting of east, west, north, and south macrofaces, which are sensitive to the site-specific climate variables of topography, including elevation, slope, aspect, soils, soil moisture, insulation and vegetation. Each differently facing slope is a different microclimate with different light, soil, stability, nutrient, moisture and vegetation characteristics. Contiguous topoclimates are the foundation for long-term ecosystem stability and sustainability, requiring quantitative climatic water budget analysis. (Environmental/Preservation Organization, Weldon, CA - #16041.82000)

REMOTE SENSING TECHNOLOGY

We believe the use of remote sensing might be used to help sustain and enhance roadless area ecosystems. We recommend that either low-altitude aerial or the U.S. Military's zero-meter resolution remote sensing be utilized to identify all National Forest characteristics and assets for preservation. Since the U.S. Department of Agriculture (USDA) expects to complete a monochromatic one-meter resolution grid of the entire country, by the year 2002, zero-meter resolution scans of forest assets would easily be nested in this USDA database array for retrieval by Forest Service personnel for managing the National Forests.
The National Forest personnel should be given appropriate priority training for acquiring frequent and regular zero-meter resolution surveys of all forests watersheds, sub-watersheds and project sites for successful implementation of adaptive management and monitoring. A system should be developed by the Forest Service, which uses a zero-meter resolution MRS satellite or low-altitude aircraft IR scan and computer sort to confirm the exact location, characteristics and condition of each stream, the location of each sensitive species nest site, the location of all historical and archeological sites and artifacts, down to the arrowhead shard, as well as the wellness of the forest, down to each tree and the condition and moisture level of each topoclimate, which is georeferenced through Global Positioning System (GPS) and made up of many microclimates with different conditions of soil, stability, nutrients, moisture, light, and vegetation, for all of the proposed sale and action areas. Implementing species and habitat recovery programs, without logging, roadbuilding, grazing, etc., is the mechanism to use to improve and favor long-term fiscal commitments to adaptive management and monitoring, because the fiscal dollar costs and the habitat and species non-dollar costs will be dramatically lower and the dollar incomes will be dramatically higher. The remote sensing watershed database programs, used by Remote Sensing Labs, Sacramento, can serve to integrate monitoring objectives. Participation in mapping forest asset characteristics with zero-meter resolution remote sensing low altitude aircraft or satellite scans of the forest can eliminate inaccurate data from broad area averaging techniques, can provide exact knowledge about the conditions of the forest and can promote community, county and state interagency coordination with local partnerships, special interest groups and communities.
(Environmental/Preservation Organization, Weldon, CA - #16041.82000)

We recommend that, in addition to the "remote sensing" suggestion, the "pattern recognition" technology should also be utilized as the standard fro determining and monitoring forest asset conditions in all proposed action areas. "Pattern recognition" locates objects or characteristics of objects, like diseased trees, stressed watersheds, obsidian shards and grinding holes, by analyzing and identifying the "specular reflectance" of the radiation which reflects off each object. Specular reflectance can locate objects which are smaller than the optical resolution of the system, because it only identifies the presence of scattered light from an object or from the characteristic of an object in the area being observed by the system. So, even though the object has not actually been located, the "speckle pattern" confirms the presence of the object. Once the speckle pattern is located within the area, then magnification can be increased to pinpoint the actual object within the inspection area. (Environmental/Preservation Organization, Weldon, CA - #16041.82000)

ADAPTIVE MANAGEMENT AND MONITORING

We are concerned that the Forest Service does not heed the growing body of scientific evidence of species decline and habitat loss, caused largely by management actions. The evidence cited about management and monitoring in the Sierra Nevada Science Review, Pacific Southwest Research Center, July 24, 1998, on pages 54 and 55, states, "In its most skeletal form, adaptive management involves predicting the effects of an action on various outcomes; assuring that the action is implemented as planned; monitoring the effects of an action on a set of structural and functional attributes of the resource ecosystem; assuring that the action is implemented as planned; monitoring the effects of the action to determine which predictions were accurate and which were not; and using the results to better understand the ecosystem and to do better planning the next time. Thus monitoring provides the feedback loop to improve future planning and management. Without effective monitoring, whatever else we do is not adaptive

management. Consequently, monitoring must be integral to a conceptual model of how the ecosystem works (including the human element) and to management actions, and its benefits must be clear in that context. Because of the highly complex nature of ecosystem components and functions, often a lack of technical understanding about how to do monitoring in a sufficiently rigorous way, and generally high costs, monitoring is one of the most challenging tasks mandated to the national forests. Effective monitoring programs must be comprehensive yet implement able. They must be designed to track key indicators of ecosystem conditions and trends and to establish whether management actions have attained stated goals. They must be designed to track key indicators of ecosystem conditions and trends and to establish whether management actions have attained stated goals. They must also include feedback loops that evaluate and incorporate new information as it is obtained. Given the potentially high costs of monitoring, the investment in what to measure, at what expected precision, and how often, must be guided by an assessment of the risks associated with assumptions made when formulating plans, including the level of uncertainty in the science that undergirds those plans. Based on such a risk assessment, priorities for monitoring may be set close collaboration with science communities will better enable national forests to conduct effect monitoring and meet sustainable science-based management goals. A common information problem encountered in landscape and ecosystem planning efforts is poor identification and integration of geographic and temporal scales of data. Effective monitoring would generate information at appropriate spatial scales of ecosystem and social relevance and use this to adjust management. Declining federal budgets and shrinking specialist workforces on the Sierra Nevada national forests have affected their ability to implement monitoring programs. This is especially critical in situations where laws dictate surveys and evaluations prior to projects (e.g., NEPA, National Historic Preservation Act) that would be assumed to provide protection, but skeletal staffs and budgets compromise the adequacy of compliance. The challenge here is to design a monitoring system that can and will be implemented within likely budget and human resources. Broad-based conveners of monitoring and adaptive management programs, as well as central caretakers of data, are lacking in the Sierra Nevada. Centralized data access and distribution of new data are keys to successful local and regional implementation. (Environmental/Preservation Organization, Weldon, CA - #16041.82000)

Public Concern: The Forest Service should clarify the difference between reference landscapes and research natural areas.

Comment: Entire Section-- The current forest planning process addresses the concept of “reference landscapes” through identification, evaluation, and allocation of Research Natural Areas. This concept appears to be a duplicate effort intended to justify the “Proposed Action”. None of the “adaptive management” concepts discussed identify road management and design concepts or timber harvest management or design concepts. Relief: The Forest Service must clarify the difference between “reference landscapes” and “research natural areas…” (County Elected Official, Worland, WY - #16185.84400)

Public Concern: The Forest Service should study the impacts of off-highway vehicles by allowing various intensities of use on ecologically similar sites.

In a variety of regions throughout the forest service, select ecologically similar sites and allow various intensities of off-road vehicle use as part of a Forest Service-wide study to examine the impacts of off-road use in a scientific manner. For example, one might choose ecologically similar sites in a particular region (e.g. Wyoming) and allow unrestricted off-road vehicle use in some of them, ban use by off-road vehicles in others, allow only snowmobiles in others, and allow only ATVs in others (other designs agreed upon by forest service personnel, independent scientists, and citizen groups could obviously be used). Gather baseline data on all forests included in the study, and then monitor changes over a 5-10 year period (or longer depending upon the specifics of the system under study). At the conclusion of the study, we will be much more likely to understand the impacts of various types of off-road activities on national forests of different types. This will allow Forest Service employees to make better plans and more informed decisions to protect diversity and ecosystem services in national forests while allowing for use by citizens who enjoy use of off-road vehicles. (Individual, Collegeville, MN - #19744.91610)

Public Concern: The Forest Service should use roadless areas to study ambient noise on a forest-by-forest basis.

Roadless areas are the perfect place for the Forest Service to study the natural ambient level of noise on a forest-by-forest basis, this is in keeping with the identified characterization of roadless areas as related to reference landscapes for research, study or interpretation. The Sierra Club urges the Forest Service to begin baseline natural ambient studies as have been done in national parks like the Grand Canyon. (Environmental/Preservation Organization, Washington, D.C. - #43731.82000)

5.2 Forest Health

The Forest Service should maintain healthy forests through active management of roadless areas according to a number of respondents. Some concerns are focused on loss of merchantable timber. They also are concerned with insects, disease, and wildfire risks associated with what one person calls "benign neglect." One individual recommends additional alternatives considering limited access under specific circumstances to treat insect infestations, disease, and fire. Conversely, a conservation organization argues there is no existing data supporting harvest of old trees for forest health; quite the opposite, their data concludes artificial reduction of average tree size increases the risk of stand replacing fire. Another conservation organization recommends banning herbicides from roadless areas as a harmful activity.

In addition to these general concerns, respondents also address the Adequacy of the Forest Health Analysis, Subsection 5.2.1.

Additional concerns regarding forest health and timber management can be found in Chapter 6.

Public Concern: The Forest Service should maintain healthy forests through active management of roadless areas.

Increase foresting activity to have more diverse and healthy forests, and diverse habitat for more animals and plants. (Individual, Solidew, WY - #3509.84000)

BEGNIGN NEGLECT WILL NOT RESTORE HEALTHY FORESTS. Walling off tens of millions of acres of forest will doom them to a cycle of overstocked stands, disease and insect infestation, and wildfire. (Timber Company, Woodruff, WI - #1983.84000)

The "roadless initiative" proposed by President Clinton is bad news for forests within the western United States. By restricting access, the management of forest density as well as the control of pests and diseases by means other than prescribed burning become non-existent. Our forests have been neglected and mismanaged for far too long, and the utilization of prescribed burning is the worst excuse for forestry management ever devised.
There is no logical justification for wanton destruction of a natural resource, watershed, wildlife habitat, personal property and the quality of life for nearby inhabitants. Even the most severely infested, diseased and overgrown forests can be harvested and utilized, whether it is for paper, particle board or firewood. (Individual, Garden Valley, ID - #7101.84000)

My second major concern is the fire danger development where good, sound forest management practices are not followed. Again it is not good conservation to allow usable timber to burn needlessly. Forest managers should be encouraged to develop sound management plans for our national forests and then given adequate resources to carry out those plans. (Wise Use or Land Rights Organization, No Address - #8332.9999)

Let us manage our forests! Without management mother nature will only carry out the same process in a more detrimental way and we will receive no benefits from the deal but a crispy forest. (Individual, Kalispell, MT - #10401.84200)

BY CONSIDERING ADDITIONAL ALTERNATIVES

I believe that the Forest Service has not prepared a reasonable range of alternatives. Why haven't they developed an alternative that permits road construction in specific roadless areas threatened by insects, disease, and fire. To comply with NEPA and the DEIS, it should include a range of alternatives that vary the amount of roadless acres or the number of roadless areas where environmentally sensitive, multiple use road conditions can be allowed. (Individual, Wallace, ID - #21167.61000)

Public Concern: The Forest Service should eliminate timber harvest for "forest health."

We [Society for Conservation Biology] know of no case where existing data or scientific opinion support logging of old trees for "forest health" purposes. A statement from a forthcoming report by a panel of eminent scientists (Scientific Panel on Ecosystem-based Forest Management, 2000, "Logging to maintain forest health: a critique") summarizes our concerns:
Any logging that reduces average tree size, at either the stand or landscape scale--including clearcutting, shelterwoods, seed tree cuts, selective cutting of larger trees, or thinning that lowers average stand diameter--will increase the risk of stand-replacement fires rather than decrease it. Thinning only small and intermediate trees less than 100 years old could decrease fire risk, depending on how much new risk is introduced by logging slash (or its disposal). Under-thinning done carefully can be a useful tool to reduce fire risk in dry forest types. Logging that compacts soils, creates roads, or depletes nutrient stocks simply trades one kind of problem for others. The challenge is to alleviate one problem without exacerbating others or creating new ones. Therefore, each project requires careful thought and analysis. (Environmental/Preservation Organization, Corvallis, OR - #6130.84000)

Logging causes the loss of forest health and, as described above, a loss of the fire prevention characteristics of the forest and logging increases wildfire severity and intensity. Again, this is never even given a cursory analysis in the DEIS; never is any detail given to describing how the activities proposed will accomplish the underlying goal to which the agency is responding. The DEIS states on page 3-53, that, "By retaining the ability to mechanically manipulate vegetation for stewardship purposes, the agency's capability to directly and indirectly enhance habitat would be maintained. Timber harvest for stewardship purposes is described in the Timber Sale Program Information Reporting System as " . . . sales being made primarily to help achieve desired ecological conditions and/or to attain some non-timber resource objective that requires manipulating the existing vegetation - for example, improving forest health or reducing forest fuels" (USDA 1998c)." A mechanism stating how the proposed activities of logging will accomplish improving forest health is never described in any more detail. This violates NEPA and its implementing regulations 40 CFR § 1500.1(b). "An EIS must be sufficiently detailed to allow a responsible official to arrive at a reasonably accurate decision regarding the environmental benefits and detriments to be expected from implementation." (Sierra Club v. Froehlke (1973) 486 F.2d 946.) (Environmental/Preservation Organization, Weldon, CA - #16041.82000)

Public Concern: Herbicide and pesticide use should be banned in roadless areas.

Roadless areas should be protected from being subject to any and all herbicide, pesticide, or biocide spraying programs. (Environmental/Preservation Organization, Fossil, OR - #52433.80000)

5.2.1 Adequacy of the Forest Health Analysis

A county official demands the Forest Service justify its claim that roadless areas are better able to respond to natural disturbances such as fire or windstorm than roaded areas. In a related concern, a timber association believes the Final EIS should include an alternative-by-alternative analysis of projected wildfires and projected insect and disease concerns for each roadless area, adjacent national forest lands, other public lands, and private lands.

Public Concern: The Forest Service should justify its claim that roadless areas are better able to respond to natural disturbances than roaded areas.

Comment: Page 1-1, last paragraph-- What is the reference for these statements that roadless areas are better able to respond to natural disturbances? Why are roadless areas better able to respond to natural disturbances like windstorms and fire? Why are they better able to respond over any other area that has been logged, roaded, grazed, or developed and then burned or blown down? Can these assumptions be proven? Relief: The Forest Service needs to add citations and clarify these assumptions. In addition, they need to address the questions presented. (County Elected Official, Worland, WY - #16185.82000)

Public Concern: The Final EIS should include an alternative-by-alternative analysis of projected wildfires and projected insect and disease concerns.

The environmental analysis should include, at a minimum: The current and projected potential for catastrophic wildfires and the current and projected mortality from insects and diseases for each of the proposed alternatives for the Roadless Areas themselves, as well as adjacent national forest lands, other public lands, and private lands. (Timber Association, Rapid City, SD - #15900.84000)

5.3 Weeds, Insects, and Disease

Several respondents believe the Forest Service should use active management, particularly roads, to control invasive weeds, insects and disease vectors, specifically the pine beetle, Canadian Thistle, Houndstongue, leafy spurge, and blister rust. Others take the Forest Service to task for lax weed control, and recommend the agency increase the priority of invasive weed management. One individual questions the agencies ability to conduct disease surveys with the limited road access of the proposed rule. Another person suggests the agency might succeed at controlling non-native species by managing people, as opposed to their largely unsuccessful management of the forest.

In addition to these general concerns, respondents' comments are divided into two subsections: Subsection 5.3.1 Effects of Other Activities on Weeds, Insects, and Disease; and Subsection 5.3.2 Adequacy of the Analysis of Weeds, Insects, and Disease.

Public Concern: The Forest Service should use active management to control invasive weeds and disease vectors.

Another concern I have is the weed control and the control of the pine beetle on the national forests. Canadian thistle alone is taking over much land and if it isn't controlled, will take everything. Leafy spurge and Hounds Tongue are also noxious weeds needing control. These areas need access in order to control problem areas. (Individual, Newcastle, WY - #597.83620)

We also need to rid some of the area of undergrowth and to cut diseased trees before they infect other timber. (State Elected Official, Sandpoint, ID - #10682.84300)

TO PREVENT BLISTER RUST

Objections to Roadless Areas in the Chequamegon and Nicolet National Forests: When the chestnut blight was allowed to kill a quarter of the eastern forest in the United States, roads allowed the salvage of the dead trees 80 years ago. Now the white pines are dying of blister rust because the gooseberries are not killed. They are the alternate host which allow the blister rust to spread. People need roads so they can kill the gooseberries. The American Elms are mostly dead except in cities where they have roads to work to save their elms. They died of Dutch Elm disease. (Individual, Park Falls, WI - #13676.84300)

Public Concern: The Forest Service should mitigate the spread of weeds.

The U. S. Forest Service has been especially lax in dealing with and monitoring the expansion of weeds. (Individual, Corvallis, MT - #8092.83620)

Increase priority status of combating non native species. (Individual, Missoula, MT - #10873.83620)

Public Concern: The Forest Service should address how disease surveys will be conducted after implementation of the proposed rule.

How will the Forest Service survey forest areas for disease when road access will be limited and personnel is already downsized? (Individual, Douglas, AZ - #13311.84300)

Public Concern: The Forest Service should manage humans to mitigate disturbance of native species.

We've already lost too much. Once an area is opened up, disturbed, it can never be restored. Pernicious aggressive non-natives fill the niche and the delicate and fragile natives stand no chance. Scotch Broom -Blackberry is almost impossible to get rid of once an area has been opened up. The use of herbicides become a toxic and deadly solution. When will the ridiculous cycle end? The forests are fragile, our human arrogance believes we can "manage" something so intricate and complex that science can not yet completely understand. We should be managing humans and our intervention. (Individual, Cottage Grove, OR - #759.83600)

5.3.1 Effects of Other Activities on Weeds, Insects, and Disease

Respondents diverge in their opinion about the influence of roadless areas on the spread of weeds. Some believe roadless designation is an effective and cost saving alternative to roads and herbicides, while others believe birds and animals are effective vectors for spreading invasive

weeds, eliminating any benefit roadlessness might otherwise contribute in the fight against weeds. Foot traffic, motorized traffic, livestock, and "weed wildlife" such as robins and magpies introduce invasive species, weakening native ecosystems, according to many respondents. According to one conservation organization, the disturbing activity of road construction itself is also a vector in both weed dispersal, and disease, as in the case of Port-Orford-Cedar root disease,.

Public Concern: The Forest Service should consider the influence of roadless areas on the spread of invasive plant species.

THEY PREVENT SPREAD OF WEEDS

Natural roadless areas also help prevent the intrusion of invasive plant species. (Individual, Hailey, ID - #7381.83620)

The aspect of maintaining smaller acreage that is roadless is, I believe, becoming increasingly important. I am one who is very concerned about the invasion of alien species. I see the destruction locally on National Park Service lands. I am also aware of the terrible cost to eradicate. I have tried to get some action regarding one species. In most cases ignoring the problem seems the way of operation today. Is there a lesson for the forest service here? I believe so. Thus keeping smaller areas roadless helps keep an area as a refuge against the spread of invasives. These small areas also help maintain biodiversity, conserve species with limited ranges, protect those with special habitat needs and provide linkage to larger areas--especially necessary for neo-tropical migration/nesting, for instance. Invasive weeds are spreading at about 4600 acres a day on federal lands in the West. To get rid of them is often limited by human power/funds as I mentioned above. Keeping these small areas roadless and protected from ORV's also is important. One ORV on a back country trail can spread millions of knapweed seeds. (Individual, Alexandria, VA - #10889.83620)

THEY HAVE NO EFFECT ON THE SPREAD OF WEEDS

In your publication FS-670 under the heading Background you list six public benefits [of roadless areas] my comments on each follows:
Barriers against noxious weeds - This shows an utter disregard of the force of nature. The wind in conjunction with bird and animal droppings will continue to spread plants irregardless of the whims of a bureaucrat. (Individual, Idaho Falls, ID - #7108.83000)

Weed seeds can as easily be spread by birds and animals as by humans! (Individual, Clancy, MT - #11329.83500)

Public Concern: The Forest Service should address the role roads and trails play in the introduction and spread of noxious weeds.

As a citizen who has been involved in Forest Service roadless area planning and management for 20 years, I have been increasingly aware of the changes in native ecosystems due to roads, trails, and routes - basically any motorized or non-motorized routes into unroaded areas. Invasive weeds are brought into areas by foot traffic, motorized traffic and livestock. If you look, dandelions, invasive thistles and other non-native plants can be seen more and more along the edges of trails and dirt roads. Robins, magpies and other weed wildlife follow the human routes into roadless areas. Weed plants and weed wildlife reduce the habitat of native species thereby pushing out native plants and animals, particularly along the edges of trails and roads. Weed plants and weed wildlife reproduce quickly and begin to change the character and make-up of an ecosystem. As human activity, both motorized and non-motorized continue, native ecosystems are further weakened. (Individual, Boulder, CO - 6755.83620)

Clearly, the Forest Service must ensure that its policies support rather than hinder the important campaign to minimize damage caused by invasive exotic plants. Protecting roadless areas is one of the most important "weed control" policies because of the intimate connection between roads and the spread of invasive plants. Weeds spread is greatly facilitated by human activities which disturb the soil, open the canopy, and injure vulnerable native vegetation. Road building directly disturbs vegetation, creates disturbed soils in which invasive plants often have advantage, changes water courses and opens the canopy to light. Weed propagules are often transported on the construction equipment or in fill or gravel. The impact of roads is not short-term, but permanent. Roads open the area to heavier human use of all types -- and those activities themselves contribute both further disturbance of soils and vegetation and modes for transporting weed seeds to these welcoming sites. Weed propagules can be carried on any truck, car, ATV, logging equipment, boat, and livestock. Hikers, mountain bikers, and horseback riders also transport seeds. The increased presence of people also increases the likelihood of unplanned fires -- which, again, can open opportunities for plant invasions. Weeds are spread from centers of infection by wildlife, wind, and water. These centers are often established by the deliberate planting of the invasive species, including unwise choices for revegetation of disturbed, overgrazed, or burned areas. The link between roads and invasions is less clear for most exotic insects and fungal pathogens. In some cases, however, roadbuilding is directly linked to damaging infestations; the most prominent example is Port-Orford-cedar root disease, caused by Phytophthora lateralis. (Environmental/Preservation Organization, Nevada City, CA - #50392.84300)

BY ROADS

I am greatly concerned with the spread of noxious weeds. Roads are the main avenues through which weeds travel and motor vehicles provide the mechanism to accelerate the pace of weed invasion. (Individual, Corvallis, MT - #8092.83620)

Roads provide a way for alien and invasive species to gain a foothold in undisturbed areas adjacent to the roads. (Environmental/Preservation Organization, No Address - #1826.83620)

There is no other impact more hideous for the introduction of noxious weeds into a “weed-less” area than the presence of a new road. Weeds follow roads. We hear of various economic arguments about this initiative, yet the Forest Service spends a considerate amount of our tax dollars every year trying to reduce and eliminate harmful weeds. Weeds are a huge problem, not only for wildlife forage, but as a threat to keeping natural diversity intact. The areas of our forests that have yet to be invaded by noxious weeds are almost exclusively found with in road-less lands. Building roads into them will only allow the weeds an avenue of spread. This is truly a case where “an ounce of prevention (no new roads) is worth more than a pound of cure (expensive weed removal).” (Individual, Missoula, MT - #10557.83620)

The spread of noxious weeds in Montana is horrific, as you know. Roads into forests are the main arteries of introduction of weeds seeds. Closing them will help. The USFS can't afford to keep up a weed program and can't afford to maintain its existing roads, no less create and maintain new ones. (Individual, Basin, MT - #7381.83620)

The absence of roads will minimize the threat that aggressive invasive weeds will be introduced to these pristine areas, thereby helping assure the survival of native habitats. (Individual, ID - #10509.83620)

BY VEHICLES

I have spent many days hiking Northwest wilderness and adjacent areas since 1953 and have visited many roaded areas of National Forest and have been active in noxious weed control in my local area. I have seen a lot of off road ground disturbance and spread of noxious weeds by motorcycles and 4 wheeled vehicles. I have seen a lot of large fragments of plants (knapweed particularly) spread by snowmobiles. (Individual, Cashmere, WA - #13478.83620)

5.3.2 Adequacy of Analysis of Weeds, Insects, and Disease

The Forest Service should not assume that limiting roads will curtail the spread of insect and disease infestations, according to one respondent who goes on to comment he has “yet to see an

insect or disease that uses a road." One timber industry representative requests the Forest Service analyze the risk for insects and disease in each roadless area.

Public Concern: The Forest Service should not assume that limiting roads will curtail the spread of insect and disease infestations.

It also states on page 3-22 that the forest health will be benefited by reducing the spread of damaging insects and diseases into intact areas. I have yet to see an insect or disease that uses a road. There are many dead trees in the Manti-LaSal that have been killed by insects, and they are in areas that currently have no roads into them. I think it is ridiculous to make the assumption that not having roads is going to affect the damage from insects and disease. (Individual, Manti, UT - #26036.84300)

Public Concern: The Forest Service should analyze the risk of insects and disease in 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 referenced below as identified in this Roadless Area Conservation Proposed Rulemaking change: Risk of insects and disease for each specific area. (Timber Industry, Montrose, CO - #13091.70000)

5.4 Fire

Several respondents believe the Forest Service should retain fire access roads, both for public safety, and as a practical consideration to reduce the need for the additional disturbance of bulldozer firebreaks. Another respondent recommends fire management without roads should be based on the needs of each roadless area, and that additional funding should be pursued to effectively manage these areas for fire.

In addition to these general concerns, respondents' comments are divided into two subsections: Subsection 5.4.1 Effects of Other Activities on Fire; and Subsection 5.4.2 Adequacy of the Analysis of Fire.

Public Concern: The Forest Service should retain fire access roads.

FOR PUBLIC SAFETY

Roads offer access to manage the national forests with prescribed burning, timber harvesting and also wildfire control. Roads are needed for accessibility for fire suppression forces. States have supplied significant firefighting resources on federal lands, but if safety concerns over access are not alleviated this may be greatly reduced in the future. People cannot be placed in harm's way with no retreat route (no roads). (Individual, West Point, UT - #4008.84000)

TO REDUCE THE NEED FOR BULLDOZER FIREBREAKS

Roaded areas provide access for firefighting vehicles. The last forest fire I worked on was near Idaho City, Idaho. I worked in the capacity of dozer boss. We constructed fire lines 3 dozer-blades wide, which went for miles. We dozed off safe areas for firefighters to retreat to that were the size of football fields. A suitable road system gives firefighters a better opportunity to attack a wildfire quickly, before it blows up and requires a lot of dozer line. I should point out that road locations are carefully selected to minimize erosion. A dozer line goes the shortest distance to get around a fire, often going straight up and down steep hillsides. There is a lot more soil disturbance to a dozer line than to a well constructed road. (Individual, Sundance, WY - #18441.84200)

Public Concern: The criteria for fire management should be based on the needs of each roadless area.

FIRE Criteria for fire management without roads should be based on the particular needs of each roadless area, and strong appeals by land managers and the public for adequate funding, should be pursued, including the use of programs like "Jobs in the Woods", which was pioneered here in the Rogue Valley. (Individual, Ashland, OR - #13107.84100)

5.4.1 Effects of Other Activities on Fire

One individual contends timber companies should be required to remove slash to reduce fire danger. Another recommends the Forest Service ban grazing in order to reduce the effects of fires.

Public Concern: Slash from timber harvest operations should be removed to reduce fire danger.

At the same time, the slash left by timber company irresponsible logging should be removed to reduce the increased fire danger resulting from logging operations. (Individual, Spokane, WA - #8989.84100)

Public Concern: The Forest Service should ban grazing in order to reduce the effects of fires.

All roadless areas should be protected from logging, grazing, mining, or off-road vehicles, due to their serious impact on native fish, plants and wildlife. Because cattle grazing has been proven to lead to more destructive forest fires, it is vital that it not be allowed to resume. (Individual, No Address – #15236.80000)

5.4.2 Adequacy of Analysis of Fire

A county official contends the Forest Service must reevaluate its discussion in the Draft EIS regarding the effects of the proposed rule on the occurrence of wildfires, the incidence of human caused, as opposed to lightning caused fires in roadless areas, and the potential for large catastrophic lightning caused wildfires. He further contends the Forest Service should provide evidence for its conclusions. Timber industry representatives recommend the Forest Service complete site-specific analyses of fire risk in roadless areas.

Public Concern: The Forest Service should reevaluate its discussion on page 3-22 of the Draft EIS regarding the effects of the proposed rule on the occurrence of wildfires.

Comment: Page 3-22, second bullet list on Forest Health-- The statement that protecting more inventoried roadless areas from roading would result in a reduction in the occurrence of human caused fires, without disclosing the potential for increases in large catastrophic wildfires caused by lightning, is misleading. Lightning is responsible for approximately 75% (Page 3-152) of the annual acreage burned by wild fires in inventoried roadless areas in the West. Relief: The Forest Service must provide evidence for this assumption and clarify the discrepancy. (County Elected Official, Worland, WY - #16185.84200)

Public Concern: The Forest Service should complete a site-specific analysis of fire risk in roadless areas.

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): Roadless Areas At Risk From Catastrophic Fire(acres) DEIS SAYS "LOW PRIORITY FOR FUELS TREATMENT..." Sky Lakes B not currently high risk; although over time risk increases and DEIS would preclude any treatment (all future road access to reduce risk, improve suppression and speed restoration are forgone by DEIS) (Timber Industry or Association, Eugene, OR - #15879.7000)

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 referenced below as identified in this Roadless Area Conservation Proposed Rulemaking change: Risk of fire if left untreated for each specific area (Timber Industry, Montrose, CO - #13091.70000)

5.5 Biodiversity

The Forest Service should consider the importance of roadless areas for protecting biodiversity, according to conservation groups and individuals. One group contends roadless areas act as genetic reserves, and de facto refuges for sensitive plant and animal species. Another conservation organization asserts the proposed roadless area protection “would go a long way toward meeting the goal of representing all major ecosystem types in biological reserves.” Lands containing endemic flora and fauna should be conserved as living laboratories, including degraded lands that are restorable, one individual advocates. Another argues roadless areas are a reservoir from which medicines, food, and other resources can be drawn in the future. Some feel the Forest Service should provide stronger protection for biodiversity than is proposed in the DEIS and the “Preferred Alternative,” including all human-caused disturbances. In a related concern, one individual urges the Forest Service to adopt Alternative 4 because it has the most substantial benefits for biological diversity through reduction of human impact and increased habitat conservation. Another person advocates a landscape/ecoregion approach to biodiversity protection as necessary to preserve a biodiversity network. A more moderate respondent recommends restricting road construction only where necessary to preserve biodiversity.

In addition to these general concerns, respondents' comments are divided an additional subsection: Subsection 5.5.1 Effects of Other Activities on Biodiviersity.

Public Concern: The Forest Service should consider the importance of roadless areas for protecting biodiversity.

Large roadless areas are the key to providing habitat for America's biodiversity. The value of the forest is much greater for the natural services it provides above and beyond paper. (Individual, Newburyport, MA - #2651.83400)

The February 2000 issue of 'Conservation Biology' devoted an entire special section to articles on the impacts of roads and the benefits that roadless areas provide to biodiversity. Among other important issues, these peer-reviewed scientific papers reveal that roadless areas are among the least-disturbed landscapes on the planet and may act as de facto refuges for numerous sensitive plant and animal species. The distributions of several species, such as large carnivores, are closely associated with roadless areas and landscapes with low road density. Streams flowing from these areas provide the highest quality habitat for aquatic organisms and maintain clean drinking-water supplies. A recent study by two Forest Service scientists (R.L. DeVelice and J.R. Martin, "Assessing the extent that roadless areas complement the conservation of biological diversity," 'Ecological Applications' shows that protecting roadless areas on national forests would go a long way toward meeting the goal of representing all major ecosystem types in biological reserves. This is especially true in the West (unfortunately, in the East, roadless areas and public land generally are presently too scarce to allow adequate representation) (Environmental/Preservation Organization, Corvallis, OR - #6130.83410)

Roadless areas are the last best place to protect threatened biodiversity from the detrimental effects of fragmentation and habitat destruction caused by man's intervention in wilderness areas. Migratory corridors will remain intact. (Environmental/Preservation Organization, ID - #10509.83421)

All remaining lands that contain endemic biota and fauna, or are critical habitat for native fish and wildlife, should be conserved as living laboratories. These lands can provide humankind with genetic reserves and ecological tools to restore biological diversity, and productivity, to adjacent lands that have been degraded. Adjacent lands that can be restored cost-effectively, should be adjoined to roadless areas as wildlife migration corridors and for fisheries restoration. Fish and wildlife scientists should be consulted to determine if lands and waters in these core areas can be enhanced for native species recovery. Critical habitats and adjacent recoverable lands should be delineated on a map and distinguished from areas with less recovery potential. Other public lands can be managed for their current uses as provided by law. (Individual, Kalispell, MT - #1580.64420)

PROVIDING MEDICINES, FOOD AND OTHER RESOURCES

These areas are critical for our future survival because they are a reservoir of biodiversity that we will need to draw on for medicines, food and other resources, and for repairing damaged ecosystems in the other 99% of the world. (Individual, Pocatello, ID - #733.83400)

Public Concern: The Forest Service should provide stronger protection for biodiversity than is proposed in the DEIS and the "Preferred Alternative."

The Forest Service must provide stronger protection for biodiversity than is proposed in its DEIS "Preferred Alternative." (Individual, Tromso, Norway - #5868.83400)

I am writing to urge the Forest Service to provide stronger protection for biodiversity in the National Forest System. As an ecologist, I am particularly sensitive to the importance of preserving areas of land free from roads and other human-created disturbances. Roads not only fragment ecosystems and reduce habitat suitability for many plant and animal species, but also permit development and facilitate the invasion of exotic species. Roads are also responsible

for increasing fire risk and the occurrence of other human disturbances (including poaching). The current Draft Environmental Impact Statement still contains many loopholes that will severely compromise the biodiversity in currently undisturbed, roadless areas of National Forest. (Individual, No Address - #6110.83400)

Public Concern: The Forest Service should adopt Alternative 4 because it has the most substantial benefits for biological diversity.

Alternative 4 has substantial benefits for biological diversity due to reduced human impact and increased conservation of important fish, wildlife, and plant habitats. This Alternative will have substantial benefits for nearly 200 threatened, endangered or proposed species and will substantially reduce the risk of increased introduction and establishment of non-native invasive species (S-22). (Environmental/Preservation Organization, Seattle, WA - #10788.83400)

Public Concern: The Forest Service should apply a landscape/ecoregion approach to biodiversity protection.

A landscape/ecoregion approach to biodiversity preservation networks is necessary. Regional ecosystem representation within reserves is an important concept. The coterminous states need much more, and public lands are the only feasible place for this to occur on such a large scale. (Individual, Leavenworth, WA - #15897.83000)

Public Concern: Road construction in roadless areas should be restricted only where necessary to preserve biodiversity.

I am not in favor of a full ban [on road construction in roadless areas] except in areas where the value of the biodiversity objectively justifies such a ban. (Individual, Fort Collins, CO - #358.83400)

5.5.1 Effects of Other Activities on Biodiversity

Respondents hold conflicting opinions regarding the effects of roadlessness on biodiversity. Some feel roads benefit biodiversity, by allowing access for fire suppression, providing habitat that functions as a wildlife and plant corridor, and providing disturbed habitat for rare species that require it. Others feel roads have a negative effect on biodiversity, and urge the Forest Service to limit new road construction.

Public Concern: The Forest Service should evaluate the effects of roadlessness on biodiversity.

ROADS BENEFIT BIODIVERSITY

I don't agree with your claim that biological diversity, in the long term, will be better in roadless areas especially when these areas are ravaged by wildfires. Wildfires on the Payette burned over 300,000 acres in the last decade. More than 80% of these acres were in roadless areas. (Individual, McCall, ID - #6484.83400)

The USFS cites preservation of biological diversity as a benefit of a roadless area. While undisturbed land areas can provide important wildlife and plant habitat, roads and rights-of-way (especially with relatively little traffic) also can provide important habitat and can act as wildlife and plant corridors that promote both biological diversity and

healthy populations of species. Rare species that thrive on meadow or disturbed habitat often rely on utility rights-of-way for their very survival. (Utility Group, Washington, DC - #52503.83400)

ROADS NEGATIVELY EFFECT BIODIVERSITY

I am a biologist by background and recognize the urgent need to preserve biodiversity and wilderness. I believe that building new roads into roadless areas will negatively affect biological diversity of both plants and animals. I applaud the draft policy and believe the Forest Service is on the right track in limiting new roads into these areas. (Individual, Blacksburg, VA - #8607.83400)

5.6 Vegetation

One individual urges the Forest to conserve non-renewable landscapes. Some believe the Forest Service should limit active management for specific seral stages, including early successional stages in mature forest systems. Others contend the Forest Service should preserve successional stages such as old-growth forest, including that on the Tongass National Forest. A couple of people advocate returning natural fire to roadless areas, but caution the area should be managed for fire resistance to protect it from catastrophic fire. One individual notes mushrooms thrive in young forests, and suggests the Forest Service manage forests to protect fungi.

In addition to these general concerns, respondents' comments are divided into an additional subsection: Subsection 5.6.1 Effects of Other Activities on Vegetation.

Public Concern: The Forest Service should conserve non-renewable landscapes.

After seeing the Tongass myself and the impacts that harvesting has not upon the trees, but the forest, I urge you to consider making efforts to conserve these non-renewable landscapes. (Individual, Juneau, AK - #5915.80000)

Public Concern: The Forest Service should reconsider actively managing for specific successional stages.

EARLY SUCCESSIONAL STAGES SHOULD NOT BE ARTIFICIALLY MAINTAINED

Early successional stages should not be artificially maintained in mature stable forest systems. (Individual, New River, AZ - #10550.83600)

PROTECT OLD GROWTH FORESTS

We have in our unfortunate history some of the most abominable destruction of nature that this planet has ever seen. Therefore, with so many of the world's oldest trees felled, and so much of our quiet, undisturbed space gone forever, the people and the government need to end the destruction -- now. The fact that there are people logging this nations last old growth forests is shocking and outrageous. The government needs to seize these lands from the timber companies and protect them. After all, these trees are far older than we, and do not truly belong to anyone. (Individual, Northville, MI - #6677.83610)

My concern is that without the canopy old-growth trees provide, young seedlings will not flourish in our semi-arid West. (Individual, Kernville, CA - #10966.93300)

PROTECT TONGASS OLD GROWTH

I believe the policy should include the Tongass for the following reason: .The timber companies have already cut the best old growth stand of the Tongass almost 70% of it. Less than 5% of the original old-growth forest remain in the United States. The Tongass has the most and the best of America's remaining old growth roadless areas. (Individual, Juneau, AK - #6413.83610)

Public Concern: The Forest Service should consider the role of fire in roadless area vegetation management.

If an area is truly a roadless area, I believe that vegetative characteristics and tree stocking should be in a regime naturally somewhat resistant to fire or able to accept fire as a natural component of its genesis as a vegetative community. Dog-haired stands or stands in need of thinning to enhance 'roadless characteristics' should not exist although I understand the imperative of protecting against catastrophic fire due to historic fire suppression and protecting certain human communities in forested areas. (Individual, Corvallis, OR - #5157.84100)

I would like to see vegetation management that allows for the return of natural fires in our historic fire regime appropriate to the forest type. (Individual, Carlton, WA - #6873.84200)

Public Concern: The Forest Service should manage forests to protect fungi.

I enjoy the forests and spend much of my time in the study of fungi. I find hundreds of varieties of mushrooms in young forests that have been managed wisely. Surprisingly, mushrooms don’t seem to thrive as well where the trees have matured and fallen into decay. (Individual, No Address - #15616.83640)

5.6.1 Effects of Other Activities on Vegetation

One individual notes that roads allow sun in to nurture low growing wildlife forage, and recommends the Forest Service consider the beneficial effects of roads on vegetation.

Public Concern: The Forest Service should consider the beneficial effects of roads on vegetation.

Roads make openings in the forest to let in the sun for sun loving vegetation that is nutritious to wildlife. (Individual, Vonore, TN - #7525.83500)

5.7 Wildlife

Wildlife management is a fundamental concern for many respondents. Many feel the Forest Service should protect roadless areas for wildlife. They point out that roadless areas contain habitat unique to some species, and if those species are extirpated it disrupts the environmental cycle, leading to additional extinctions. One individual points to hunting research as an indicator that roadless areas provide optimum conditions for maximizing species genetic variability and long term species health. Another person feels maximizing undisturbed areas for wildlife will reduce the wildlife-human conflicts at the urban interface. A third respondent feels non-game

species should be given the same attention as game species. One person raises a similar concern regarding single species management. This respondent believes using keystone species is adequate for large-scale planning, but that smaller areas are functionally adequate for other species and can enhance connectivity between the larger areas. In counterpoint to the preceding arguments, one individual implies that working to preserve rare plants and animals is a futile attempt to thwart the natural cycle of species evolution and extinction.

In support of wildlife preservation, many writers offer management suggestions to help ensure adequate wildlife protection. One respondent suggests timber harvest requirements include provisions protecting the "basic character of the forest" so no species are displaced by timber management. Others recommend the Forest Service prohibit disturbance of wildlife during nesting and calving seasons through seasonal closures for motorized vehicles. Another advocates designated wildlife refuge areas rather than the proposed roadless areas, in order to protect wildlife from all human activity. Similarly, one person recommends buffer zones to protect wildlife diversity.

Protection of wildlife on the Tongass is an issue to one writer who feels the Forest Service should provide comprehensive protection to wildlife populations on the Tongass National Forest which, they feel, is not provided by the most recent Land Management Plan.

There is some confusion on the part of the public regarding the purpose and effect of wildlife closures. One individual cites personal experience with wildlife closures which, to that person, did not appear to protect any wildlife. This respondent requests clarification of the extent of road closures for wildlife management under the proposed rule.

In addition to these general concerns, respondents' comments are divided into three subsections: Subsection 5.7.1 Species of Public Concern; 5.7.2 Effects of Other Activities on Wildlife; and Subsection 5.3.2 Adequacy of the Analysis of Wildlife.

Public Concern: The Forest Service should protect roadless areas for wildlife.

If you are sincere about saving the forest, then it must be saved untouched! The wildlife in America is having less and less habitat to survive in. Intrusions into untouched forest destroys the last remaining habitat we have for many species. As the different species die off the chain is disrupted and other species will die as a result. (Individual, Fort Pierce, FL - #4131.83500)

It had been indicated that the primitive, roadless areas tend to produce more trophy size bull elk which is an indicator that they may play a vital role in preserving an optimum situation for species genetic variability and long term species health. (Individual, Meeteetse, WY - #523.83530)

Once a road has been introduced into a forested area, the rhythm of the forest is forever altered to the distinct disadvantage of wildlife.
People are complaining about wildlife in their yards-bears, moose, etc., and their solution is to kill the animals. Well, isn't it long past time for us to respect other forms of life. We have been infringing upon their space so badly, what can you expect? They have their place and NEED to live undisturbed. (Individual, Brevard, NC - #6161.83500)

NON-GAME SPECIES.

There is more to wildlife than ruffed grouse, whitetail deer, and other game species. There are micro-organisms in the soil, salamanders, and numerous avian species dependent on large interior forests with as little edge habitat as possible. (Individual, Barnardsville, NC - #6136.93300)

Public Concern: The Forest Service should avoid focusing on single species management.

The use of flagship/keystone species is practical for large-scale planning such as this, but smaller areas can provide adequate habitat for other species. This must not be ignored. Connectivity can be enhanced by smaller areas between larger areas; don't focus too much on single species management. (Individual, Leavenworth, WA - #15897.83500)

Public Concern: The Forest Service should reconsider preserving roadless areas based on the assumption that species are static.

In your publication FS-670 under the heading Background you list six public benefits [of roadless areas] my comments on each follows:
Habitat for rare plant and animals -Plants and animals go through cycles where new species are created while others become extinct. This shows the arrogance of a bureaucratic mind. (Individual, Idaho Falls, ID - #7108.83000)

Public Concern: The Forest Service should ensure that wildlife is not displaced by timber harvest operations.

Responsible forestry practices should ensure that the basic character of the forest remains the same after being managed (i.e. logged). This should include the same species of animals remaining after the logging, or management, not being forced to relocate due to their habitat being destroyed. (Individual, Stillwater, MN - #1533.83500)

Public Concern: The Forest Service should prohibit disturbance of wildlife during nesting and calving season.

If humans disturb wildlife during crucial times of the year, such as when birds are nesting, it can cause abandonment of the young. This is a problem with sensitive species such as the bald eagle. (Environmental/Preservation Organization, No Address - #1826.83520)

BY INSTITUTING SEASONAL CLOSURES FOR MOTORIZED VEHICLES

I am not in favor of leaving the roads open for continuous access by the off road rv's, errant travelers nor the snowmobiles. Some of these areas should be closed to vehicular travel during the rearing seasons of the indigenous animals and upland game birds. Off road vehicles should be isolated to areas designated for that type of recreational use. The snowmobiles should be only used in areas where there are no wintering big game animals. (Individual, Nampa, ID - #13184.91000)

Public Concern: The Forest Service should create Designated Wildlife Refuge Areas.

There are only a few places preserved for wildlife. If the few places left are destroyed, where will the animals roam? We must do something NOW, in order to help tomorrow's destruction of nature's precious land. Designated Wildlife Refuge Areas must be created or spared for the natural environment. Yes, it is great to have a place to camp and hike, but we are still infringing on nature. (Individual, Rock Hill, SC - #3836.83500)

Public Concern: The Forest Service should maintain buffer zones to protect wildlife diversity.

It is important to maintain buffer zones to protect the diversity of wildlife. (Individual, Pelican, AK - #7179.93300)

Public Concern: The Forest Service should provide comprehensive protection to wildlife populations on the Tongass National Forest.

Standards and guidelines in the 1999 Tongass Land Management Plan are not comprehensive enough to ensure that [wildlife] populations can remain viable. (Individual, Sitka, AK - #25029.53900)

Public Concern: The Forest Service should explain whether the roadless policy will block roads with gates for wildlife management purposes.

Some years back I went hunting in Mendocino national forest in northern California, I was driving down a secondary road when I came to a locked gate with a sign attached to it that read "road closed due to wildlife habitat protection" I walked to the end of the road but didn't see any sign of wildlife except one small set of deer tracks, is this what I can expect from this roadless policy? (Individual, No Address - #7870.83500)

5.7.1 Species of Public Concern

One individual takes issue with the Forest Service's contention that elk require large tracts of land, and requests the Forest Service remove elk as an example of species dependent on large roadless areas. Another recommends the Forest Service use tools such as timber harvest and controlled burns to enhance forage for declining elk herds.

The Forest Service should preserve habitat for all birds dependent on riparian and old-growth habitat, including migrating neotropicals according to a bird watcher from Arizona. Roadless areas on the Tongass, in the opinion of another person, should be protected to provide habitat for the northern flying squirrel which, in their opinion, is at risk under the current Tongass Land Management Plan.

Public Concern: The Forest Service should remove elk as an example of species dependent on large tracts of roadless areas.

Within the document, you use elk, grizzly bears, and wolves as examples of species dependent on large tracts of roadless areas. This is completely false in our area, at least in the case of elk, and I ask that elk be removed as an example in this context. (Individual, Cottonwood, ID - #10567.83500)

Public Concern: The Forest Service should use tools such as timber harvesting and controlled burning to aid declining elk herds.

Idaho Department of Fish and Game Biologists, as well as those serving in the U. S. Forest Service, report low forage quantity and quality throughout many unmanaged areas of the Clearwater National Forest and the Nez Perce National Forests.
Since the early 1900's Clearwater Basin elk herds have declined to half of their former levels and they continue to decline at a rate of 10% per year. Black bears, mountain lions and, now, wolves are having a heightened effect on those depleted elk herds. In some areas, elk are experiencing predator suppression. Disturbance to the land has not been allowed to occur. For elk herds to rebound, the forest must experience timber harvest and controlled burning across a broad range of landscape. Those treatments must be judiciously chosen and professionally carried out. Openings must come to the closed overstory of many forest stands so that elk can have adequate and good quality forage on the winter and summer range. (Environmental/Preservation Organization, Moscow, ID - #13043.90000)

Public Concern: The Forest Service should preserve habitat for all birds including migrating neotropicals.

I have hiked and "birded" over much of Arizona and am very concerned about the destruction that is going on in our riparian and old growth habitats. We must do all we can to save the forests, and preserve habitat for all birds, not only forest species but the neotropicals which migrate through these areas. (Individual, Scottsdale, AZ - #8088.83500)

Public Concern: The proposed rule should ensure protection for the Northern flying squirrel.

I will give one reason why remaining roadless areas in the Tongass must be protected in order for the northern flying squirrel to survive. For the 1997 TLMP, the plan that is currently being used by the Forest Service to manage the Tongass, Alternative 11 was chosen as the preferred alternative. Before making that choice, a risk assessment was conducted for various wildlife species to determine how they would be affected by the level of logging in each alternative. Logging, of course, includes road building. This risk assessment determined the "likelihood of maintaining habitat to support viable and well distributed populations of widely distributed mammals." Under Alternative 11, for the northern flying squirrel, it was determined that, at best, there was an 82% likelihood of maintaining these populations; at worst, there was only a 38% likelihood. For the subspecies on Prince of Wales Island--where much road building and logging has already taken place and is planned for the future--the likelihood estimates were even more alarming. At best, there is less than a 55% likelihood and at worst only an 18% likelihood that viable and well distributed populations of the subspecies will be maintained! Because of habitat fragmentation from logging and road building that is taking place throughout the forest, it can be safely assumed that the northern flying squirrel is already on the low end of these estimates.
These numbers represent unacceptable risks to the squirrel. Now, as you know, in April of 1999, Undersecretary of the Interior Jim Lyons made a final Record of Decision based on Alternative 11, but which also included a number of changes. Some of these changes will result in less road building, less logging, and greater protection for wildlife and other resources. The timber industry claims that Lyons went too far, that no more protection is needed, that

there is enough already. Lyons' decision, however, was mostly a political decision, and not a scientific one. The potential improvements resulting from the changes are purely speculative. There are no new risk estimates provided. There is no new scientific data included in his decision to demonstrate that the northern flying squirrel is really any better off at all. Just for fun, however, let's assume that changes proposed in the Record of Decision WILL raise the lower likelihood numbers for both populations, to, say 50%; up from 38% for the general population, and up from 18% for the squirrels on Prince of Wales. Well, a 50% likelihood is still unacceptable; 60% or 70% would be unacceptable. These numbers simply represent too much risk. And I am sure the northern flying squirrel would agree. The only way to protect the squirrel and all the other animals at risk in the Tongass is to protect all remaining roadless areas.

5.7.2 Effects of Other Activities on Wildlife

In the opinion of many people, active management of the forest is beneficial to wildlife. One writer believes wildlife prefer managed forests to overgrown wilderness areas. Others feel the shrub and grass habitat created through timber harvest provide important feed and cover for wildlife. Citing a University of Minnesota project, one respondent suggests both residual nitrogen and species diversity can be higher in harvested areas. Another advocates managing forest to retain all seral stages in order to support the widest range of species. One group of writers believe road access is an important beneficial element in wildlife management. Several suggest roads provide access for wildlife to feed, and create edge effect, upon which some species are dependent. Others in the group enumerate the benefits of roads for active wildlife management, including population control, endangered species management such as grizzly bear trapping, and rare species discovery, which one writer claims leads to protective measures that would not otherwise have been put in place. Arguing against active management, several respondents fear the desire to manage for particular species and for forest health deprives species of habitat. In addition, one individual argues against using insecticides because of the damage they do to non-target species.

The effects of roads and their uses are topics addressed by a number of people. Some believe the Forest Service should address the effects of motorized and OHV recreation on wildlife, while others believe wildlife are unaffected by either on- or off-road vehicles, including snowmobiles. Several respondents observe that wildlife uses snowmobile trails, which helps them conserve energy. Citing academic studies and the Draft EIS, there are those who argue motorized activity negatively affects wildlife by increasing range of movement in the winter and decreasing the number of offspring produced. Many people claim that they fail to see the negative effects of roads on wildlife, citing personal observations of healthy wildlife populations. In addition, one respondent believes the Forest Service should clarify that it is road construction rather than the road itself that negatively affects wildlife. The effect of trails on wildlife is a concern to some. One person cites studies on the relationship of trails and bird communities to support the assertion that trails adversely affect wildlife. Others argue the Forest Service should reconsider the comparative effects of hikers and motorized users on wildlife, claiming motorized traffic has less effect on wildlife than pedestrians.

A final concern involves the effect of the proposed rule on hunting revenues for wildlife management. One individual fears wildlife may suffer from the proposed rule because roadless designation will reduce hunting and fishing opportunities, and the corresponding license and

equipment revenues which support wildlife management will drop. In addition, this person feels reduced access will lead to overpopulation and winter kill.

Public Concern: The Forest Service should consider the benefits of active management to wildlife.

If you are so concerned about animals in the forests and have a viable habitat for them--then look at where the animals like to live. I live on the West coast and know from personal experience that the animals like managed forests a whole lot more than the wilderness areas which are overgrown with brush and messed up with fallen trees, etc. Open your eyes! (Individual, West Bend, WI - #5716.83500)

BENEFITS OF TIMBER HARVEST

The harvested areas will be beneficial to wild game with the grasses growing in the area until the timber takes over again. (Individual, Great Falls, MT - #2797.83500)

Residual nitrogen can be higher in logged areas and species diversity can be higher in logged areas. There is an ongoing research project at the University of Minnesota comparing fire to logging. (Individual, Gilbert, MN - #3539.83500)

The older any biological entity grows the more it is susceptible to mortality from a variety of natural factors. … There must be a younger timber growth present to mature into the stages, which will support the dependent species. Contrary to popular preservationist belief, systematic harvesting or removal of old growth is the only way that dependant species can be maintained. (Individual, Pueblo, CO - #2884.83610)

I am a hunter and I have been doing so for many years. In the most recent years I have noticed that the forest land has had less food available for the deer and elk. The clearings caused either by clear cuts or fires have been disappearing because of the growth occurring in the clearing and as this happens the food for the animals disappears and they migrate to the ranchers fields and the high desert. The lack of logging not only displaces the deer and elk, but other critters such as the Western Bluebird lose their homes as well. There needs to be multi layers of tree growth in the forest for all of the critters to survive and if we are to stop logging within this roadless area, we will see some more endangered species. I read recently that there was some concern about Mountain Quail being considered for a threatened status, Mountain Quail like the blue bird needs clearings for their food source. Creating new roadless Wilderness areas is going to create more problems than it solves. (Individual, Portland, OR - #5744.83500)

CLEARCUTTING

We need more clear cutting in our National Forests. As an avid grouse hunter I have noted a decline in bird numbers over the last several years that corresponds to the reduction in clear cutting. Clear cutting and burning are the only way to provide edge covers for wild life (including many birds and animals that are not hunted). I am not advocating cuts that would negatively impact stream or wetlands. Clear cutting can be conducted so that water resources are not damaged. (Individual, Fairfax, VA - #8389.93300)

ROADS

Roadless areas are generally positive for wildlife. However, some species are dependent on the edge effects of roads. Further, there are wildlife benefits that can be derived from planned management of the … [forests.] (State Elected Official, Cheyenne, WY - #2816.83500)

I do not feel that logging roads or other access roads to the national forests are detrimental to the land. I have hiked and hunted extensively in the Nantahala and Pisgah forests in NC and I find that most logging roads give access for the wild game to grasses and seeds. (Individual, No Address - #2722.80000)

Forest road impacts on wildlife is totally misconstrued. They are needed to manage most species and to limit populations to the capacity of key habitat areas. Otherwise, over population and subsequent population crashes are inevitable. This is in addition to watershed damage that may occur from overuse. (Individual, Pueblo, CO - #2884.83500)

With the preferred alternative in the DEIS we're choosing to further limit our management tools on approximately 60 million acres by prohibiting roads, their construction and reconstruction. Quite often roads are used as tools not only for timber harvest but also for wildlife management. Who in the environmental community would argue roads are not used to access, to track, to trap and transplant grizzly bears, a threatened, listed species. (Timber Company/Association, Bonners Ferry, ID - #21154.10210)

You reference that 500 species are believed to be extinct. How many of these 500 can be directly linked to a road. We submit that if you examine your records you will find more rare species have been located because of road construction and reconstruction than found in areas without roads. This has lead to specific protective measures that would not have otherwise occurred. Therefore the fact there is a road has lead to more known sites being protected, studied and possibly recovered that in areas without a road. Every discussion under headings in your "Proposed Roadless Characteristics" (proposed Rule A-12 thru A-15) have similar flaws. Use your own site specific environmental records to substantiate or refute the statements. (Timber Association, No Address - #52501.82000)

Public Concern: The Forest Service should evaluate the negative effects of active management on wildlife.

The current forest fire dilemma in the southwest may lead to some unfortunate decisions. The desire to 'improve' forest health by removing standing dead trees and clearing brush ignores the fact that over 40 species nest in these trees, and decay adds nutrients to the forest soil. (Individual, No Address - #1637.83530)

I would support an undisturbed old-growth mix of wildlife populations rather than selected birds, game and other animals through vegetative manipulation. (Individual, Corvallis, OR - #5157.83610)

INSECTICIDES ON NATIONAL FOREST SYSTEM LANDS

Please protect all forest in Oregon, on both sides of the Cascades. Please reconsider use of St sprays on Tussek moth. It kills many other moths and butterflies as well. (Individual, Eugene, OR - #5928.83400)

Public Concern: The Forest Service should address the effects of motorized and off-highway vehicle recreation on wildlife.

NO NEGATIVE EFFECT ON WILDLIFE

It has been my experience that wildlife is not threatened by snowmobilers … as they do not recognize them as people until they get off the machines, at which point they will sometimes take off, not very far, but away. (Individual, Boulder CO - #2995.83500)

No studies that I'm aware of have show negative effects on wildlife from the presence of off-highway vehicles. It seems to be more of an effect on the aesthetic sense of those who don't like OHVs. (Individual, Minneapolis, MN - #3479.83500)

One of your points for banning snowmobiles is that it negatively impacts the wildlife in the area. I have just the opposite, where the deer and moose in the area are taking advantage of a trail made by a snowmobile. I've seen tracks of both deer and moose along a freshly groomed trail, walking around downed trees in the trail and not stepping off into the deep snow for a long ways. Most animals take the path of least resistance, and we're giving them that path. Harsh winters will have less impact on the wildlife if they are able to take an easier path, and spend their energy only when needed. (Individual, Sagle, ID - #7113.83500)

NEGATIVE EFFECTS TO WILDLIFE

Studies demonstrate the effects of increased motorized off road traffic on wildlife. For example, Dorrance et al (1975) found that home range size and daily movement of white tailed deer increased with increasing snowmobile activity in Minnesota. Yarmoloy (1988) found that mule deer experimentally harassed by ATVs produced fewer offspring the following year. Also, excessive motorized vehicle activity encouraged by extensive road systems degrades the quality of experience for many public lands user such as hunters, fishermen and non-consumptive wildlife users. (State Agency, Santa Fe, NM - #17300.91000)

In the Forest Service Roadless DEIS the FS states: "Comments should reference their [the FS] faulty logic as follows: 4. OHV's can be prohibited from roadless areas on a national level because they do significant damage to the roadless areas through introduction of exotic weeds, pollution, and soil compaction." We would hope that the FS would extend its concern beyond the forest itself to include the impact of OHVs on wildlife living in this habitat. (Individual, Nevada City, CA - #8462.83500)

Public Concern: The Forest Service should consider that wildlife is not negatively impacted by roads.

I would challenge anyone to show me where there is more wildlife in a wilderness area than a non-wilderness area. If you will get out and look you will find that most wildlife rather likes to hang around roads. (Individual, Mitchell, OR - #1257.83500)

One of the arguments for keeping areas roadless is that roads will disrupt wildlife and their habitat. Here again, what has taken place on the upper Rio Grande makes this idea suspect at best? Many new roads have been built in the last part of the 20th century over much of the area but the wildlife continues to thrive. We have the largest deer, elk and bear populations ever in spite of increased hunting pressure and kill. Non-game wildlife also is doing well and introduced species such as moose are increasing in population. (Individual, Monte Vista, CO - #6802.83500)

Public Concern: The Forest Service should clarify that it is road construction rather than the road itself that negatively affects wildlife.

In response to public statements concerning the belief that wilderness and national forest road-use disturbs wildlife: The concern is not that the use of the roads disturbs wildlife, it's the building of the roads that disturbs wildlife. Blasting, bulldozers, chainsaws, trucks, these are the things that are detrimental to wildlife and the environment in general. (Individual, Bozeman, MT - #9412.83500)

Public Concern: The Forest Service should consider the impacts of trails on wildlife.

NO NEGATIVE EFFECTS TO WILDLIFE

It's quite possible that wildlife flourishes because of the trails maintained by snowmobilers. These same trails are there for the enjoyment of all Winter sports enthusiasts. (Individual, Hudson, NH - #227.83500)

NEGATIVE EFFECTS TO WILDLIFE

Recent studies demonstrate that even trails have an impact on wildlife. For example, Recreational Trails and Bird Communities (Miller & knight 1995) was a study of habitat preference and selection in forest and grassland habitats seeking to determine whether species diversity, composition, and abundance differed along trails as compared to areas away from trails, and whether rates of nest predation and brown-headed cowbird parasitism differ along trails

compared to habitat away form trails. We believe that adverse impacts attributed to trails can only be far worse along roads. (Environmental/Preservation Organization, Davis, CA - #29925.83500)

Public Concern: The Forest Service should reconsider the comparative effects of hikers and off highway vehicles on wildlife.

Vehicle closures are not necessary to the emotional health of the wildlife. Although the green groups claim that off road motorcyclists terrorize wildlife, especially elk, my own experience has shown the exact opposite. I seldom see elk when hiking or cross country skiing. I see them frequently when riding my off road motorcycle and they don't run away. At first blush this may seem incredible, and certainly counter-intuitive. However, from an elk's point of view, it makes perfect sense. He has been SHOT AT by hikers (hunters). He has never been shot at by dirt bikers. When a hiker stealthily approaches on foot, it elicits the same reaction as a hunter. When I approach on my motorcycle, the elk hears me coming and knows I am not sneaking up on him. I have both hands in plain view and clearly occupied with the cycle. He can tell I am harmless. I have tested this theory by stopping, which does cause the elk to trot away, and by reaching into my pocket for a camera, which causes them to run. (Individual, Albuquerque, NM - #16182.83500)

Do you realize that many of the off road clubs and motorcycle clubs do more for animal trails and the environment than the majority of forest users. Our groups are constantly maintaining trails and improving the environment we use. And several studies show that motorized uses DOES NOT ADVERSELY EFFECT animals in these areas. The animals are not nervous because they can hear us coming and move out of the way if they choose. They are more likely to be spooked by a normal hiker that they cannot hear. (Individual, 16201.83500)

Public Concern: The Forest Service should consider the effect of the proposed rule on hunting revenues for wildlife management.

Wildlife will suffer. Since sportsmen contribute most of the conservation money via taxes on hunting, fishing and camping equipment, if there are fewer opportunities to hunt and Fish people will stop buying sporting goods. Therefore reducing money necessary for conservation. Forests that are not harvested become too thick to support deer, and other wildlife. These forests are more prone to burn and therefore kill wildlife by reducing the carrying capacity of the land and direct deaths by fire. Decreased hunting pressure will lead to overpopulation and increased winter-kill as hunters lose access to public land. This will make wildlife management much harder and less effective. (Individual, Bigfork, MT -#10834.83500)

5.7.3 Adequacy of Analysis of Wildlife

Adequacy of analysis for wildlife is a concern addressed by several respondents. The Forest Service should conduct species-specific inventories of roadless areas, according to one individual, who feels there is not enough information about the species and other roadless area resources to make informed local decisions.

Another respondent believes roadless designation will lead to increased wildlife populations, which in turn will lead to increased vehicle/animal collisions. This individual maintains this is a safety issue the Forest Service has failed to analyze.

One person argues the Forest Service has insufficient information to demonstrate a connection between poaching and road access.

A final writer believes a new NOI should be developed which includes an analysis of wildlife implications for early successional species.

Public Concern: The Forest Service should conduct species-specific inventories of roadless areas.

There is not enough specific information about the content of the forests within the proposed roadless area to make an informed decision. The DEIS does not indicate the specific species and content of the proposed roadless area except to indicate that these areas do not have roads. When I asked for the specific economic effect the Roadless Initiative would have upon the timber related industry in the Chequamegon-Nicolet National Forest areas, the personnel I spoke with at the Park Falls, WI National Forest Office indicated that information was not available. He was not sure exactly what was in the proposed roadless areas, but assured me that an inventory would be done when the Roadless Initiative was passed. How can an area be managed if its content is unknown? Perhaps in the future, there will be a need for a new road in the proposed roadless area. The Roadless Initiative would prevent this. I am of the opinion that decisions should not be made without adequate information. (Individual, Stratford, WI - #11336.33300)

The Forest Service should make new species surveys to prevent any species from becoming extinct, and to evaluate the effects and impacts of any logging on each specific species of wildlife, birds, small mammals, fur-bearers, herpetofauna, amphibians, aquatic invertebrates and all varieties of vegetation in the forest and which would be impacted by logging proposals and any other action. The Forest Service would otherwise be failing to adequately explain to the public the significant impacts to the environment and be failing to define pertinent, relevant facts used for decision making by the public. The Forest Service must evaluate the inventories of the project specific sites, monitor for soil richness, watershed sedimentation, wildlife species concentrations and quality and specify current biodiversity, before any logging and burning actions. The Forest Service must monitor for changes in soil richness, watershed sedimentation, wildlife species losses, and decline in biodiversity. All roadless areas should be identified, inventoried, and preserved as roadless areas to prevent any changes in the fire prevention characteristics of the roadless areas, which would increase the chance of wildland fire. (Environmental/Preservation Organization, Weldon, CA - #16041.82000)

Public Concern: The Forest Service should address the potential increase for vehicle/animal collisions.

Wildlife populations should increase from this proposal and it is possible the human populations will be more concentrated in linear locations along the established highways. It is possible then that there will be an increase in vehicle/animal collisions which is a human safety issue that was never addressed or analyzed in the DEIS. (State Agency, Cheyenne, WY - #15885.70000)

Public Concern: The Forest Service should demonstrate the connection between poaching and road access.

Just because the Wilderness Society alleges such a thing in its mailings regarding the Targhee NF doesn't make poaching a widespread threat. The Forest Service must fully study poaching rates and present tangible evidence that poaching and roads are in fact interrelated sufficiently to impact game populations. (Individual, Whitefish, MT - #30417)

Public Concern: The Draft EIS should include an analysis of wildlife implications for early successional species.

If the Forest Service insists on going forward, a new NOI should be developed that includes wildlife implications for early successional species. (Individual, Titusville, PA - #905.83500)

5.8 Habitat

Those who commented specifically on habitat supported protection. One respondent feels the Forest Service should protect the uninterrupted habitat required by such species as fisher, wolverine and lynx by prohibiting timber harvest. Another maintains that critical habitat in sizes of 1,000 to 5,000 acres should be protected for the benefit of watersheds and endangered fish populations. A third respondent supports protecting low elevation roadless areas as valuable winter range. Several people endorse protecting roadless areas for wildlife dependent on undisturbed habitat such as old growth and interior forest. These areas are dwindling in numbers, and their protection could ensure the future viability of many species according to these respondents. Another writer believes the Forest Service should recognize the importance of forests as the principal habitat for pollinators, which contribute billions of dollars to the agriculture industry. A proponent of limited management suggests the Forest Service allow active management for special exemptions such as ground bird habitat.

In addition to these general concerns, respondents' comments are divided into two subsections: Subsection 5.8.1 Effects of Other Activities on Habitat; and Subsection 5.8.2 Adequacy of the Analysis of Habitat.

Public Concern: The Forest Service should protect animal habitat by prohibiting timber harvest.

Many creatures that need old growth forest and/or large uninterrupted forest (fisher, lynx, wolverine, etc.) are in decline. Commercial logging via cable, helicopter or any other means would destroy the last place that these animals can survive. (Individual, Bend, OR - #6749.83500)

Public Concern: The Forest Service should protect roadless areas greater than 1,000 acres but less than 5,000 acres as critical habitat.

I do not know the exact amount, but I would estimate that some 6 million unroaded acres exist, in patches that are greater than 1000 acres, but less than 5000 acres. These areas are critical as habitat, especially in areas that are already fragmented. Unless they are protected, great damage to watersheds could result in places where fish populations are already on the brink of extinction. (Individual, Philadelphia, PA - #17539.83100)

Public Concern: The Forest Service should protect low elevation roadless areas as valuable winter range.

Many of the areas which still are roadless include many valuable lower-elevation lands which are valuable ecologically. While many high-elevation alpine areas in Colorado are protected as wilderness, areas such as the

troublesome roadless area and the Badger-Creek area contain valuable tracts of lower elevation lands, lands in which many species reside during the winter months. (Individual, Denver, CO - #7362.83422)

Public Concern: The Forest Service should protect roadless areas for wildlife dependent on undisturbed habitat.

More importantly, these roadless areas have become critical habitat for a myriad of endangered species and other wild creatures that require undisturbed areas in order to complete their life cycles. You must take stronger action to protect these areas. (Individual, Sonoma, CA - #1621.83500)

I must feel that the remaining roadless areas on our national forests should largely remain intact to try to preserve wildlife habitat and the habitat qualities that plantations do not provide. (Individual, Columbia City, OR - #2715.83500)

OLD GROWTH

I am a wildlife biologist who works in Lassen National Forest. We need to have our last remaining Roadless areas adequately protected from development. The last remaining Roadless areas are the final bastions of habitat for many species of wildlife which are dependent on undisturbed old growth habitat. Without such areas being protected the future viability of such populations would be in jeopardy. (Individual, Chester, CA - #6005.83500)

INTERIOR FOREST

To keep these areas unfragmented by roads will go a long way toward the protection of species which require interior forests for successful reproduction and survival. (Individual, Nederland, CO - #5751.83421)

Public Concern: The Forest Service should recognize the importance of forests as the principal habitat for pollinators.

As the principal habitat for thousands of pollinators, national forests may contribute as much as $4 billion to $7 billion to U.S. agriculture. (Individual, No Address - #13933.83000)

Public Concern: The Forest Service should allow active management for special exemptions.

GROUND BIRD HABITAT

The only exception should be the removal of some timber to enhance the environment of ground birds. (Individual, Falmouth, ME - #5569.84200)

5.8.1 Effects of Other Activities on Habitat

One of the most pervasive effects on habitat, according to one respondent, is that of human encroachment on low elevation winter range, which is rapidly disappearing as ranches and other open space are developed. An additional management problem is the effect of the shape of roadless and unroaded areas on interior habitat, according to another person. This individual endorses round, self buffering areas rather than oblong or irregular shapes which increase edge effect.

Public Concern: The Forest Service should consider the effects of human encroachment on wildlife's winter range.

Unfortunately, when lands were originally set aside as public domain there was often inadequate provision for wildlife winter range. This region of our nation has more recently come under intense pressure as the popularity of mountain home or ranchette living has blossomed. The modern concept of being successful is building an expansive homesite on a ridge overlooking forest land - all bazillion acres of it!
Ranchland in the past often supplemented wildlife's need for winter range. Today many of these ranches are being sold, subdivided and will never again provide needed open space or winter range. Unfortunately, a large number of the people who are coming into our area are looking for 2nd homes and are not content with living in town. (Individual, Buffalo, WY - #6626.71220)

Public Concern: The Forest Service should reshape roadless areas to mitigate the effects of adjacent disturbed areas and maximize interior habitat.

The shape of a roadless and unroaded areas also has a significant impact on their ability to support biodiversity, particularly for those species that require interior forest habitat, such as songbirds. Roadless areas that have a rounded shape provide the best and most secure habitat for wildlife. Rounded areas inherently have a self-buffering effect from the negative ecological effects of roads and disturbances associated with them (commonly referred to as an "edge effect"), and thus provide more effective interior habitat. Areas that are narrow, oblong or have "fingers" created by cherrystems provide less effective interior habitat and are more susceptible to edge effects. These areas should be "rounded out" wherever possible so as to prevent edge effects from penetrating into the interior of roadless areas. Multiple intrusions into roadless areas that create "fingers" should be eliminated, so as to increase the effective habitat available. These thinner areas, or "fingers' are still crucial to protect in many cases because of their contribution to the overall landscape connectivity. (Environmental/Preservation Organization, Albuquerque, NM - #43737.83500)

5.8.2 Adequacy of Analysis of Habitat

The final plan should include an analysis of the effects on big game winter range both within and adjacent to roadless areas, according to a timber industry representative. A state agency accuses the Forest Service of using selective data to support the case for road prohibition and neglecting any discussion or comparison of the benefits of managed versus unmanaged forests. A recreational organization and a county official both advocate conducting site specific analyses of the effects of roads in the different alternatives on habitat effectiveness for local species prior to any changes in management. They go on to recommend the Forest Service develop a range of road closure alternatives that would still allow a full range of forest management activities. Lastly, there is a recommendation the Forest Service conduct and support research to provide a better understanding of the effects of habitat degradation.

Public Concern: The final plan should include an analysis of the effects on big game winter range.

What were the results of the analysis of this proposed rule on the big game habitat for both summer and winter range within and/or adjacent to this roadless area? (Timber Association, Eugene, OR - #15879.83500)

Public Concern: The Forest Service should compare the effects of roadless areas and managed forest on wildlife, using comprehensive wildlife data.

The alleged benefits of roadless areas to terrestrial wildlife are detailed (pages 3-69 to 3-73), but there is little documentation (one-half sentence on page 3-72) of the comparison to managed forests, which, in some cases, may actually provide better wildlife habitat conditions. In fact, there is a selective use of the literature to build the case for road prohibition. While "remoteness from human activity is a key characteristic of black bear habitat" is stated (page 3-70), Georgia black bear data indicate that forest roads are not a deterrent to bears, and may in fact provide critical soft mast during years of hard mast shortage. Similarly, the effects analysis for hunting and fishing (pages 3-173 and 3-174) described the adverse effects of the no-action alternative on some wildlife species, but failed to describe the beneficial effects of a managed forest on other wildlife species such as white-tailed deer and wild turkey. (State Agency, Social Cir, GA - #13974.83500)

Public Concern: The Forest Service should base any proposed changes to the management of roads in roadless areas on the potential site specific effects of roads on habitat.

There exists a wide range of Forest resource outputs derived from roadless area characteristics, such as big game habitat capability needs. Some of these thermal, safety, travel and escape habitats are in blocks of 1,000 acres or less and are important support elements to seasonal big game use patterns. Therefore, prior to taking FS actions that degrade wildlife habitat capability through changing any roadless areas to a roaded ROS, a site-specific analysis should be developed under NEPA Process and Forest Plan guidance. (Recreational Organization, Dardanelle, AR - #19474.83500)

COMMENT: Page 30-72, fourth paragraph--A current and projected road density by alternative would be very helpful for evaluating effects. Most studies evaluating habitat effectiveness have concluded that open roads account for the greatest decline in habitat effectiveness (Lyons and others 1982). These and other studies have found that road closures (even seasonal) restore habitat effectiveness to their original levels.
RELIEF: The Forest Service must display current and projected road densities to effectively evaluate habitat effectiveness for local species. Then, they must determine the effectiveness of a full range of road closure (seasonal, year-long, etc.) alternatives that allows for road construction, reconstruction, and timber harvest. (County Elected Official, Basin, WY - #43980.64400)

Public Concern: The Forest Service should conduct and support research to provide a better understanding of the effects of habitat degradation.

The USFS needs to provide solid, ongoing support for research in order to provide for a better understanding of the effects of habitat degradation (Individual, Pelican, AK - #7179.83510)

5.9 Connectivity and Fragmentation

Habitat connectivity is a significant concern to a number of people. Some are distressed by the ongoing fragmentation of the landscape, and recommend mitigating measures such as including small roadless areas to collectively create interconnecting habitat. One individual feels the connectivity of roadless habitat on the Tongass National Forest is at higher risk than in other areas because the landscape is naturally fragmented, and therefore less resilient to further fragmentation. Others are concerned the Forest Service has wrongly concluded the effects of fragmentation are the same in alternatives 2 and 4, and recommend adopting alternative 4 and

incorporating data from metapopulation ecology in their decision making process. Another individual demands the Forest Service develop a management plan that assures wildlife corridors between key wilderness areas within an ecosystem regardless of roadless inventory status.

In addition to these general concerns, respondents' comments are divided into two subsections: Subsection 5.9.1 Effects of Other Activities on Connectivity; and Subsection 5.9.2 Adequacy of the Analysis of Connectivity.

Public Concern: The Forest Service should protect roadless areas for habitat connectivity.

My family has resided in the Pacific Northwest since 1979 and has witnessed the continued erosion of our quality of life. Where there were once large tracks of wilderness land to tent camp and hike in, now are clear cuts and endless roads cutting off passageways and migration routes of wildlife that have existed since time began. We are deeply hurt and affected by the decrease in diversity in the area. What few bears and cougars are killed on sight in the name of safety for humans, which should not be in these once remote areas. (Individual, Vancouver, WA - #1509.92000)

BY INCLUDING SMALLER INTERCONNECTING AREAS

I am concerned that the Draft Roadless Areas Policy currently circulating for comment does not include protection for the multiple small parcels of roadless tracts that collectively comprise critical interconnecting habitats for many species struggling to survive in our National Forests. (Individual, Portland, OR - #3126.83500)

BY ADOPTING ALTERNATIVE 4

The DEIS is correct to define "fragmentation" as the "breaking up of large areas of forest by human activities into many smaller tracts separated by different landscape elements." The DEIS goes on to discuss the importance of "connectivity" and concludes that "Habitat in roadless areas is generally less fragmented and better-connected than in roaded areas of similar size."
The DEIS is absolutely right to state that "Roads are a major contributor to forest fragmentation."
At the same time, the DEIS is wrong to conclude that "The effects of ecosystem health from fragmentation and loss of connectivity are the same as under Alternative 2."
If ribbons of road fragment forests (and they do), then broad swaths of tree harvesting even more drastically fragment forests (even in the absence of roads where logging is conducted by helicopter or forwarder).
For wooded NFS roadless areas, the USFS must conclude that Alternative 4 is the best.
(The USFS consideration of this issue would be even stronger if it considered the important new interdisciplinary field of "metapopulation ecology" that marries population genetics, landscape ecology, and conservation biology. Metapopulation ecology reveals the serious genetic consequences of inbreeding depression in wildlife populations in fragmented landscapes. Consideration of fragmentation in the light of metapopulation ecology would provide even stronger justification for Roadless Conservation in general, and for Alternative 4 in particular.)
(Environmental/Preservation Organization, Laramie, WY - #31993.82000)

IN THE TONGASS

In a naturally fragmented landscape, such as the Tongass, there are heightened concerns regarding fragmentation, isolation of populations, and local population extinctions (USDA 1997 d). Under these conditions, unroaded areas may play a critical role in maintaining biological integrity. Unroaded areas help provide adequate quantity and quality of habitat, connectivity between habitat, and greater likelihood that populations will not be further isolated from one another. Because ecosystems in naturally fragmented landscapes may be less resilient to further fragmentation, the loss of unroaded areas may pose a considerably higher risk to species existence and persistence. P. 3-229 paragraph 2. (Individual, Troy, MT - #2885.83421)

Public Concern: The Forest Service should develop a management plan that assures wildlife corridors between key wilderness areas.

It is imperative to protect the roadless character of all areas in the greater Yellowstone Ecosystem, especially in the Gallatin Range, regardless of the Forest Service's inventory status of those roadless areas. I urge a management plan that assures wildlife corridors between the key wilderness areas of this ecosystem (for example, Yellowstone National Park, Absaroka-Beartooth Wilderness, and Lee Metcalf Wilderness) and the neighboring important habitat areas of the Gallatin Range, the Tobacco Roots, and the Crazy Mountains. These roadless area policies are necessary to protect water quality, wildlife, and fisheries. (Individual, Bozeman, MT - #8632.83421)

5.9.1 Effects of Other Activities on Connectivity

The majority of the effects concerns for connectivity and fragmentation are covered in the broader effects categories under habitat and wildlife. One individual strongly recommends the Forest Service consider the fragmentation effects of roads.

Public Concern: The Forest Service should consider the fragmentation effects of roads.

Roads fragment habitat from wildlife. Nearly every science based study between roads and wildlife show that wildlife need roadless areas for sanctuary, survival and undisturbed migration and movement. On the Bridger-Teton, we're talking about preserving unfragmented forest land that will help grizzly bear recovery, as grizzly bear death in roaded areas is five times as likely as in non-roaded areas.
We're talking about protecting wild lands that will help wolves return to -- return to and thrive in our ecosystem. Roads -- wild lands that will protect elk migration paths and important calving grounds. We're talking about preserving forests across the country from the costs of ill conceived and ill designed roads that have caused us to lose fisheries, to lose other wildlife, to lose water quality and even to lose forest to landslides and human-caused fires. (Individual, Jackson, WY - #21784.83000)

5.9.2 Adequacy of Analysis of Connectivity

Comments regarding the adequacy of analysis and recommendations for additional analysis are explicit with regard to fragmentation and connectivity. One conservation organization believes the Forest Service should include in its road fragmentation analysis federal, state, and county roads crossing forest land in order to more accurately assess the effects of roads on connectivity. A county official questions the validity of using the grizzly bear, which has a restricted range, as a habitat fragment indicator on a nationwide scale. The official continues, recommending the Forest Service use road densities, patch sizes, and major barriers rather than species to calculate the effects of the proposed rule on fragmentation. Another conservation organization requests the Forest Service more clearly distinguish between natural disturbance events and human caused fragmentation, which they feel differ in many ways from each other. They also request the Forest Service adopt Alternative 3 or 4 based on the superior treatment of fragmentation effects. A final concern from a county official regards inconsistent units of measure in the analysis of fragmentation effects. This individual requests the Forest Service clarify its comparisons and use consistent units of measure when addressing fragmentation.

Public Concern: Road fragmentation analysis should include federal, state, and county roads.

On page S-4, (and wherever else it is found in these documents), the FS has more than 500,000 miles of roads in the NF, since county, state, and federal roads must also be counted. So fragmentation and road impacts are even worse than portrayed. (Environmental/Preservation Organization, Bellaire, TX - #13951.83421)

Public Concern: The Forest Service should avoid using grizzly bear recovery potential as a measure of effects of the proposed rule on fragmentation.

Comment: Page 3-58, fifth paragraph-- To use Grizzly bear recovery potential as a measure of the effects of the proposed alternative on fragmentation is analogous to using coyote populations to "measure" the health of the sheep industry. A much better "measure" would be a disclosure of predicted road densities, average patch sizes on a large scale and major barriers such as interstate highways and urban areas. This data is available through sources such as the U.S. Fish and Wildlife Services' "GAP" Analysis Maps. It is also questionable to use the restricted range of the Grizzly bear as a habitat fragmentation effect indicator for the hundreds of vastly different species nationally, including such species as narrowly distributed endemic snails that might or might not be affected by fragmentation. Relief: The Forest Service must address fragmentation using the factors identified above at the local level and avoid using species, such as the Grizzly Bear and snails, which may not represent the majority of roadless area impacts. (County Elected Official, Worland, WY - #16185.83421)

Public Concern: The proposed rule should more clearly distinguish between natural and human caused fragmentation.

There is overwhelming evidence documenting forest fragmentation as a root cause to the decline of biodiversity both globally and nationally (see Wilcove et al. 2000, Debinski and Holt 2000 for recent review). Wilcove (et al. 2000) estimates that habitat degradation and destruction, including forest fragmentation, is the single greatest contributor responsible for listing species under the Endangered Species Act--accounting for over 80% of all listings. While the DEIS reviews some of the relevant literature on forest fragmentation, it inadequately distinguishes between habitat fragmentation and its underlining anthropogenic causes vs. habitat heterogeneity caused by natural disturbances. This distinction is important because natural disturbance events differ in many ways from anthropogenically-caused habitat fragmentation. As an example, natural disturbances tend to produce landscape mosaics in a dynamic state of equilibrium with continuous recruitment of the full range of seral states as well as the retention of many more legacy components than clearcuts and other anthropogenically-caused disturbances. The long-term consequences of human-caused fragmentation include a tendency to flip the matrix from a continuous forest with scattered openings to a sea of clearcuts with isolated forest patches. These difference in disturbance mechanisms and ensuing landscape matrices are responsible for a large number of species that have declined from the cumulative impacts of timber harvesting, road building, and other human-caused disturbances, including large carnivores, interior dwelling species, and native salmonids.
While the DEIS acknowledges effects of forest fragmentation on ecosystem values and services, the preferred alternative allows for many fragmentation to proceed (albeit at lower levels than No Action but still significant), particularly those same activities that are acknowledged as having significant impacts to ecosystem values (logging, mining, and road building). More importantly, the DEIS erroneously concludes that there are no substantial differences in forest fragmentation under Alternatives 2-4 yet levels of logging and road building are clearly different among alternatives. THEREFORE, WE REQUEST THAT THE EIS MORE CLEARLY DISTINGUISH BETWEEN NATURAL AND ANTHROPOGENICALLY CAUSED HABITAT FRAGMENTATION AND ELEVATE THE IMPORTANCE OF MITIGATING CUMULATIVE IMPACTS BY ADOPTING ALTERNATIVE 3 OR 4 BECAUSE OF THEIR SUPERIOR TREATMENT OF FRAGMENTATION EFFECTS. (Environmental/Preservation Organization, Ashland, OR - #13522.83400)

Public Concern: The Forest Service should use consistent units of measure when addressing fragmentation.

Comment: Page 3-57, third paragraph-- The section on Fragmentation makes some erroneous statements. On Page 3-57, No Action, the document states that "More than half of the timber harvest volume is expected to be from clearcutting...Clearcutting is an important cause of biodiversity loss." This is misleading and contrary to other statements on Page 3-114 that states "Nationally, clearcutting has decreased from 31% of total harvest acres in 1989 to only 10% in 1997." One statement uses "volume" and the other "acres." However, using "volume" figures makes the impact sound more severe. Relief: The Forest Service must be clear in the comparisons and use consistent units of information. (County Elected Official, Worland, WY - #16185.83421)

5.10 Aquatic Wildlife

Concerns regarding aquatic wildlife are almost all about road impacts, habitat, and specific species. The Forest Service should prohibit or improve road-building to protect aquatic species according to several respondents. They cite Forest Service data showing 80% of forest culverts as inadequate for juvenile fish passage, and State of Alaska data indicating culverts can be installed in such a way to permit passage of juvenile salmon. One individual suggests paying timber contractors to repair or close roads in the course of their work in order to protect fish stocks. Another concern involves the effectiveness of habitat draining late-successional and old-growth forests. Citing a variety of sources, one group endorses protecting this habitat type as supporting a high degree of biological integrity, high biomass and fish densities.

Several writers are concerned with the management of particular aquatic species. One individual contends that habitat restoration is the key to salmon recovery. Others argue the Forest Service should prioritize funding to repair culverts blocking salmon passage. A conservation organization from Tennessee recommends roadless designation for the Wolf river on the Holly Springs National Forest to protect endemic species of freshwater mussel.

In addition to these general concerns, respondents' comments are divided into an additional subsection: Subsection 5.10.1 Effects of Other Activities on Aquatic Wildlife.

Public Concern: The Forest Service should prohibit road-building to protect aquatic species.

In an area that is incredibly delicate, in regard to the issue of runoff, etc., it no longer makes sense to continue road-building when your own statistics recently have shown that four-fifths of your culverts are inadequate for allowing the passage of juvenile fish. (Individual, Juneau, AK - #7111.83510)

Public Concern: The Forest Service should improve road building practices to protect fish stocks.

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 roadbuilding practices in the

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

BY PAYING TIMBER CONTRACTORS TO REPAIR OR CLOSE ROADS

[In the Tongass] There are existing roads that need repair to prevent damage to fish stocks due to faulty drainage. Why not pay the construction companies that are part of the logging operations to repair or close these roads and thereby protect fish stocks. (Individual, Tenakee Springs, AK - #8123.83510)

Public Concern: The Forest Service should protect the aquatic habitat associated with streams draining late-successional and old-growth forests.

"Streams draining late-succession and old-growth riparian forests displayed a gradual, but significant increase in [LWD] loading"; ("Instream large woody debris loading and riparian forest seral associations in the southern Appalachian Mountains", Hedman, Van Lear, Swank, Can. J. For. Res. 26: 1218-1277 (1996)). "[T]rout always used units that had the most LWD. In the absence of high fishing pressure, streams with large amounts of LWD appear to support higher trout density and biomass than streams with little or no LWD." ("trout Use of Woody Debris and Habitat in Appalachian Wilderness Streams of North Carolina", Flebbe and Dolloff, N.A. Journal of Fisheries Management 15: 579-590 (1995); research by FS biologists, incorporated by reference). Research in areas lacking roads and with minimal levels of human disturbance reveals that "'the importance of wilderness in aquatic conservation is extraordinary' [quoting Hitt and Frissell (1999)] … They also concluded that, given the relative rarity of unprotected areas that support a relatively greater degree of aquatic biological integrity, undisturbed areas warrant permanent protection." (DEIS 3-80). (Business/Business Association, Staunton, VA - #29919.83510)

Public Concern: The Forest Service should acknowledge that science supports the restoration of habitat as the key to the salmon fisheries recovery.

It is now clear, and supported by the vast majority of science, that restoration of habitat is the key to salmon recovery, without it the sacrifices made by fishing communities from California to Alaska will all be for naught. (Individual, Bellingham, WA - #9694.83510)

Public Concern: The Forest Service should maintain roads to improve salmon resources.

According to information provided to us a substantial portion of the currently established forest roadways are not safeguarding the salmon habitat. In a survey of 163 salmon streams [road] crossing half of the culverts failed to allow juvenile salmon to pass through. Rather than build new roads it would seem that the Forest Service needs to spend funds and effort to properly maintain existing roadways in a manner that will preclude damage to the salmon resource. (Environmental/Preservation Organization, No Address - #9352.83510)

A recently released Forest Service report reveals serious problems with road crossing on Tongass fish stream. The annual Monitoring & Evaluation Report for FY 1999 revealed the results of a survey of 265 Class I (salmon) streams and 546 class II (trout) streams. Of the 163 passing juvenile fish, while over half did not, and the remaining one-third may or may not meet fish passage standards. Of the 488 Class II streams surveyed with culverts, less than one-tenth met fish passage standards, while close to four-fifths did not, and the remainder may or may not pass fish. Instead of spending more taxpayers dollars to plan money-losing timber sales in roadless areas, the Forest Service needs to spend its budget on restoring and maintaining the existing road system. (Individual, Juneau, AK - # 52964.83510)

Public Concern: The Forest Service should protect the freshwater mussel populations of the Wolf River in the Holly Springs National Forest through roadless designation.

The upper reaches of the Wolf within Holly Springs National Forest also host a diverse population of freshwater mussels. Species such as, Q. pustulosa, T. verrucosa and the only known Mississippi location of Elliptio dialtata exist on the Wolf River in Benton County Mississippi. Roadless area designation would greatly help the protection of these species by limiting ORV use of streams as crossing points and actual pathways. (Conservation/Preservation Organization, Memphis, TN - #25572.83510)

5.10.1 Effects of Other Activities on Aquatic Wildlife

The Forest Service should address the effects of poor forest management on aquatic resources, according to some. One individual believes poor forest management in Alaska has caused mass wasting, destroying estuaries, crab and shrimp nurseries, and salmon producing streams; and recommends stringent road building and logging standards to alleviate the problem. Another argues destruction of the salmon streams affects the viability of bear populations. Additionally, there is concern about the magnitude of illegal introduction and harvest of fish species.

Public Concern: The Forest Service should address the effects of poor forest management on aquatic resources.

Salmon fishing is a valuable forest-dependent industry in Alaska and in some coastal communities has historically been the only industry. Sediment washed down from poorly managed forests can destroy estuaries, drown out crab and shrimp nurseries, lead to or exacerbate flooding or coastal areas, and kill salmon production entirely. Poor forestry practices in the past have stripped protective vegetation from salmon producing streams, elevated water temperatures to the point where salmon die, and channelized river systems so badly that they may take generations to naturally recover. In many cases, the health of forested watersheds determines the health of our near shore fisheries and the economic future of our communities. For this reason stringent road building standards need to be in place to maintain high quality fish and wildlife habitat. And funding linked in any timber sale plan to safeguard stricter logging standards set for road building. (Individual, Pelican, AK - #7179.83510)

We need to realize that road building often, unintentionally DESTROYS OR AT LEAST COMPROMISES STREAMS AND RIVERS WHERE TROUT AND SALMON RUN TO BEAR OFFSPRING. Is it true that 50% of the fish in some of the Tongass National Forest streams that have been affected by road building are being compromised? (Individual, Milwaukee, WI - #8060.83510)

2468.ENVIR.918 Public Concern: The Forest Service should expound on the magnitude of illegal introduction and harvest of fish species.

Paragraph 4. The statement is made that "Illegal introduction and harvest of fish species are also less likely to occur in these areas due to lack of ready access." Comment: What does this statement mean? How big is the problem of "illegal introduction and harvest of fish species?" I cannot assess this threat without some kind of rate of occurrence or probability of occurrence of this. (Environmental/Preservation Organization, Davis, CA - #29925.83400)

5.11 Threatened and Endangered Species

The Forest Service should protect roadless areas as threatened and endangered species habitat, many contend. The grizzly bear, grey wolf, salmon, and spotted owl are all listed by these respondents as species requiring the type of habitat roadless areas provide. Some argue the Forest Service will continue to degrade endangered species habitat in roadless areas if timber harvest and mining are permitted under the proposed rule. Others endorse protecting threatened and endangered species on the Tongass by targeting their habitat for roadless area protection. Several people contend the Forest Service is neglecting the Canada Lynx by protecting inappropriate habitat through roadless area designation. They argue the lynx has specific tree age ratio requirements and feeds on snowshoe hare which requires low growing forest, neither of which are readily available or sustainable in existing or proposed roadless areas. One individual supports eliminating roads on the national Forest altogether to enhance wolf habitat. Another endorses timber harvest to improve grizzly bear habitat and food sources such as huckleberries. A third recommends the Forest Service reintroduce grizzly bears and wolves into the lower Rockies and move cattle back to private ranches.

One individual recommends the Forest Service consider the effects of excluding inventoried and non-inventoried roadless areas on sensitive, threatened, and endangered species, and working with local community habitat conservation plans pursuant to Sections 10 and 7 of the Endangered Species Act.

In addition to these general concerns, respondents' comments are divided into an additional subsection: Subsection 5.11.1 Adequacy of Analysis of Threatened and Endangered Species.

Public Concern: The Forest Service should consider the need for roadless areas as threatened and endangered species habitat.

Roadless forest wildlands provide habitat for threatened and endangered species like the grizzly bear and the gray wolf. (Individual, Cedar Crest, NM - #7511.83520)

The salmon and various species of mammals, e.g., grizzlies, wolves, and martins are facing extinction. The great white hunters of the U.S. nearly wiped out the bison-buffalo, sometimes shooting the beasts down while sitting in the comfort of moving railroad passenger trains, not even bothering to skin them, eat the meat, or salvage their bones. Had it not been for a few Canadian conservationists, you would not see a buffalo on the range today. Destroy animal-plant habitat of our national forests by opening up more of our roadless regions, would be a tragic loss of more of the resources of planet earth. We almost lost the American Bald Eagle to the greed of chemical companies manufacturing D.D.T. (Individual, Bellingham, WA - #6900.83500)

There are many endangered, rare, & threatened species in the S. Appalachians. Many of these species require the large tracts of habitat that are only found in our National Forests. The ESA requires that the Forest Service protect & provide for their recovery. By not preventing logging & mining operations in these Roadless areas the Forest Service will continue to degrade the habitat for many of these creatures which require old growth or undisturbed areas. In doing so, the FS is not doing what it needs to protect & help them recover. (Individual, Asheville, NC-#6133.83520)

Please modify the current proposal for management of wilderness areas in our national forests to include the following key protections: Timber revenue is just one value of the public's forests. The increasing demand for recreation areas and places for wildlife to survive must also be weighed in the management decisions for the future.

Providing for wilderness is a proactive measure to make future listings of species as threatened or endangered less likely to be necessary. It is much less expensive to prevent their imperilment than to work to bring them back from the edge of extinction. (Individual, No Address, #7046.22000)

ON THE TONGASS NATIONAL FOREST

As far as the Tongass they should scout the area for wildlife that could be endangered and propose a stop. We just cannot afford to lose anymore natural wildlife areas anywhere in the U.S. (Individual, Lake Worth, FL - #6045.83530)

I live in Alaska and have seen the extremely large carnivores that depend upon the moose, caribou, and fish that live in the Tongass!! If you log and destroy this habitat then there will be even less moose, caribou and fish, and more people eaten by carnivores due to a lack of these animals. Alaska already has a wildlife crisis with its herbivores and fish, due to over hunting and fishing (some rivers ten years ago were teaming salmon and now are dead)! You may not have accounted for the smaller carnivores that live in the Tongass either. They are also finding other food sources to eat such as wolves and even people ! I have seen to many people (and I mean MANY) in the Valley (Wasilla area), Anchorage, and even Fairbanks being grabbed and devoured by carnivores, as Alaskan habitat and its natural herbivore food source is being destroyed because of the monetary greed of people. People are now becoming the NATURAL and alternative food source for ALL Alaskan carnivores!!! So far, with the research that I and another person have done, there are a minimum of 17 different species of ancient, native carnivores existing in Alaska's wilderness that have yet to be named or accepted as being in existence. This is not counting bears, wolves, and even people, that are part of their daily diets!! By invading the Tongass, you will cause more people to die inside and outside the cities and towns within Alaska as man approaches into the untouched wilderness. That land has a use, and is being used by animals who are food sources for other animals. Just because man isn't using it himself doesn't mean it is going to waste! Have you done studies on wildlife and their needs for this land? If you have, you would not want to be logging and putting roads through it! We DESPARATELY need a Federal Wildlife Manager in Alaska and not leave our precious ancient and present day wildlife in the hands of fish fanatics, Tony Knowles (Governor) and Mr. Glass (Director of Wildlife Fish and Game), who knows absolutely nothing about bears, wolves, or the living and existing ancient wildlife of Alaska! (Individual, No Address - #25584.83500)

SPOTTED OWL

I am tired of seeing hacked over forests. The Spotted Owls that I work with get effectively evicted from their nesting territories after the logging operation. There are no more places for them to go. (Individual, Chester, CA - #6005.83530)

Public Concern: The Forest Service should reconsider the availability of appropriate Canada lynx habitat in roadless areas.

This is not the type of habitat that the Canada Lynx needs. The Forest Service information that we have received on Lynx habitat requirements has tree age in a ratio of approximately 30-30-30-10. It appears that the Roadless agenda is going against the Endangered Species Act. (Individual, Omak, WA - #1065.83520)

People say the lynx need wilderness because it's a reclusive cat. As a matter of fact, it needs snow shoe hares which need low growing forests which can either be done by harvesting the timber judiciously or it can be done by big fires. That's what brings snow shoe hare in. And the fact is that this Roadless Initiative if carried out and there's not managed roads and logging the wildlife in this state and other states is going to suffer severely. (Individual, Newman Lake, WA - #21161.83520)

Public Concern: The Forest Service should eliminate roads on national forest to gain wolf habitat.

We are in favor of eliminating roads on the National Forests - especially in the Wisconsin & Michigan forests to gain wolf habitat. (Individual, Sayner, WI - #10754)

Public Concern: The Forest Service should allow timber harvest to improve forage in grizzly bear habitat.

If the future of one of the primary food sources for the grizzly is in jeopardy, the grizzly is also. The huckleberry does not survive in a nursery setting -- what we've got on the ground is what we've got. Who knows when and if we passed up that window of opportunity for seed germination because we weren't managing our forest. The Flathead National Forest has recognized in EIS after EIS that logging could improve grizzly habitat for forage of all kinds, not just huckleberries, yet any positive action is precluded because of access issues. (Individual, Kalispell MT - #9969.83520)

Public Concern: The Forest Service should reintroduce grizzly bears and wolves into the lower Rockies and move cattle back to private ranches.

It would be nice to have the Grizzly Bear and the Wolf back in the lower Rockies and leave the cattle on the private ranches. (Individual, Peetz, CO - #12932.83520)

Public Concern: The Forest Service should consider the effects of excluding inventoried and non-inventoried roadless areas on sensitive, threatened and endangered species.

FEIS should consider effects of not including all inventoried roadless lands and all roadless lands not already inventoried on the FS's sensitive species and on threatened and endangered species. The FEIS should also consider potential for contributing to the habitat conservation plan efforts of local communities, pursuant to section 10 & 7 of the Endangered Species Act. ((Individual, Tucson, AZ - #9256.83520)

5.11.1 Adequacy of Analysis of Threatened and Endangered Species

One individual believes the Forest Service should analyze the effects of roads on rare snails and the endangered Apache trout, citing the prevalence of illegal roads on the Coronado National Forest. A business in Washington takes the Forest Service to task for having identified one threatened and endangered species recovery project in the entire inventoried roadless acreage. They cite numbers of stream improvement projects for endangered anadromous fish habitat in their region, and suggest the Forest Service conduct additional research.

Public Concern: The Forest Service should analyze the affects of roads on rare snails and the endangered Apache trout.

The Coronado is home to several rare snails with extremely small habitat areas. Muddy rainwater runoff from roads affects the threatened Apache trout in the Coronado’s Pinaleno mountain range. Already 2,400 miles of Forest

Service roads lace the Coronado and Tucson-based Sky Island Alliance's field inventories have found another 800 miles to 1,000 miles of unofficial two-rut, off-road tracks in the forest. (Individual, Tucson, AZ - #13137.83210)

Public Concern: The Forest Service should clarify discrepancies regarding the number of recovery projects for threatened and endangered species.

On page 3-96 of the report, it is stated that in the entire 54 million-acre study area, only one project was identified for recovery of threatened and endangered species. This was a stream barrier to prevent movement of non-native fish into habitat occupied by Loach Minnow and Apache Trout and this could be changed to require no road construction. I would suggest that if USFS people got out of their offices they could find thousands of stream enhancement projects on USFS lands. We put in dozens of fish habitat improvement structures per year in Oregon and Washington on our timberlands that are positive steps toward recovery of endangered anadromous fish. To say there is only one project identifiable on 54 million acres of Federal land is another blatant example of the quality of this DEIS. (Business, Longview, WA - #17640.83510)

5.12 Watersheds

Many people share the concern of the Forest Service for water resources and watershed health. Frequently, respondents advocate the protection of roadless areas in order to mitigate the negative effects of roads and timber harvest on watersheds. However, instead of banning road construction, some respondents feel that watersheds can be adequately protected through the use of best management practices.

Some respondents are concerned that the proposed rule may cause a decrease in water yield. These respondents feel that the proposed rule will have effects on the hydrologic system that the Forest Service has failed to account for, including reductions in water yield to agriculture and local communities. A strong opinion expressed by some is that the Forest Service should conduct fire treatment, timber harvest, and road building to maintain watershed health.

In addition to these general concerns, respondents' comments are divided into two subsections: Subsection 5.12.1 Effects of Other Activities on Watersheds and Water Resources; and Subsection 5.12.2 Adequacy of the Analysis of Watersheds and Water Resources.

Public Concern: The Forest Service should protect roadless areas in order to mitigate the negative effects on watersheds.

Roadless areas help recharge aquifers and are often in the headwaters of municipal watersheds, providing the cleanest water and 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. These unlogged and unroaded areas also protect private property from landslides and flood damage. (Individual, Covington, LA - #1374.83100)

There is just NO justification for pushing more roads. The reasons are simple: the protection of head waters is vital as it should be evident to anyone that is even remotely awake, we are in a serious water shortage in many parts of this country. (Individual, Missoula, MT - #7870.83130)

No one questions that a prime directive of Federal and state resource management agencies is protection of water quality. Most roadless areas are in headwaters of watershed and we know that road building degrades water quality, as the sediment load to waterways is directly proportional to the linear miles of road per square mile of land. Therefore permanent protection should be extended to all roadless areas left in America. (Individual, Helena, MT - #9116.83100)

We need to protect the watersheds for water quality and purity. More and more of our rivers and streams are turning up with poor water quality score cards and these Roadless Areas will be critical in reversing these water quality trends. (Individual, Yoncala, OR - #7214.83140)

Public Concern: The Forest Service should use best management practices to mitigate the effects of road building on water and stream quality.

Concerning the impact of the roads on water and stream quality these can be mitigated by using the storm water quality best management practices (BMP).
Virtually every reason for the roadless areas have been satisfied by existing wilderness areas. Virtually every reason against building roads can be mitigated by using BMP. (Individual, Boise, ID - #8101.84500)

Public Concern: The Forest Service should evaluate the effect of the proposed rule on water yield.

Any EIS of a proposed designation of a roadless area must evaluate the potential change in land management conditions which may cause modification of the hydrologic system. Can we expect the same amount of runoff from the forest lands as have historically occurred? (State Agency, Cheyenne, WY - #15889.70000)

FOR COMMUNITIES AND AGRICUTURAL USE

Page 3-26, second paragraph—In many parts of the West, water is our most valuable and often our most limited resource. What is the rational for concluding that a cumulative reduction in water yield is a beneficial effect? To ranchers and irrigators, a decrease in water yield will not be viewed as a benefit. Relief: The Forest Service must consider the effects of reductions in water yield on communities and agricultural uses. (County Elected Official, Worland, WY - #16185.71100)

Public Concern: The Forest Service should conduct forest management to maintain watershed health.

Prohibiting roads from being built on 43 to 54 million acres is not good management…If the headwaters of a water system were dammed by rotten logs, great canyons would be created when the log jam broke. (Individual, Roseburg, OR - #9417.10210)

Where is the discussion on the effect of fires-large ones on the water shed as well as dying and diseased forest and how it affects water use outside of the forest service lands? For instance-the Canyon Creek fire has really made a major destruction of water retention in that area as well as has affected long term the water drainage both within and outside the forest boundaries. There is no long-term effect considered by the forest service to their prescribed burns that get out of hand or the effect of large fires that now will destroy thousands of acres as well as the water drainages. The large increase in erosion is not addressed in these actions you are taking now as well as the effect on water users outside of the forestlands. Years ago there were fires that took effect. Of course the fires have been stopped for years and now the forest service is beginning to mimic what happened in the past. My concern is that we have such large build ups of fuel and the fires that may occur now are going to have large affects on water and erosion that the forest service does not seem to be taking into consideration. (Individual, Augusta, MT - #5488.93110)

The Forest Service has also justified the issuance of the new roadless policy as an effort to reduce environmental impacts on national forests. However, this policy contains no language to improve watershed management or reduce environmental degradation. Instead it trumps land management plans with a national directive. (Federal Elected Official, Cheyenne, WY - #13527.64251)

5.12.1 Effects of Other Activities on Watersheds and Water Resources

Numerous respondents feel that the Forest Service should prohibit all activities that damage watersheds. They call for an end to timber harvest, cattle grazing and ORV use for the sake of watershed protection. Conversely, some feel that the Forest Service should allow timber harvest, despite past damage to watersheds. Others feel that timber harvest is necessary to improve water yields for municipalities. Many respondents call for stronger consideration of the effects of roads and road construction on watersheds. Some point to what they feel is clear evidence of the detrimental effects of roads on drainage patterns. Others highlight the increases in sedimentation and landslides caused by roads.

Many respondents are concerned about the pollution of watersheds. One asks the Forest Service to encourage the safe and sanitary disposal of mining and drilling tailings and toxic substances. An environmental organization requests the prohibition of transportation of hazardous materials over or through roadless areas. Another feels that log dumps have a negative effect on the marine environment. This environmental organization recommends limiting timber harvest activities to areas with existing roads to prevent the creation of new log dumps.

Public Concern: The Forest Service should prohibit activities that damage watersheds.

Roads in forests ruin rivers and streams and kill fish. Roads in forests cause erosion. Roads in forests bring in big trucks, motorcycles and 4-wheel drive vehicles that cause noise, erosion, stream degeneration, and just an unpleasant experience in the forest. (Individual, Vacaville, CA - #396.83110)

TIMBER HARVEST

Logging affects watershed values and diminishes water quality. Leaving roadless watersheds alone makes sense. Millions of Americans value these places in their wild condition and want them to stay that way (Individual, Angles Camp, CA - #971.83100)

Current and past logging practices have ruined many water sheds, destroyed fish and wildlife habitat zones, allowed for increased soil and mountainside erosion, and scarred the landscape with unsightly clear cuts, plus they often forever destroy old growth forests, which are truly a non-renewable resource. The endless number of roads currently on the National Forest have lead to the destruction of innumerable streams and water sheds, due to erosion which cannot be slowed or checked by the forest canopy and forest floor of decayed vegetation. Sediment runoff smothers and kills young fish. Roads and logging, especially clear cuts, destroy wildlife habitat and can lead to pushing species to extinction. (Individual, Glendale, CA - #6466.83000)

I grew up in the Panhandle National Forest of Northern Idaho. I saw the beautiful watershed of the N. Fork Coeur d'Alene River pretty much trashed by too much logging. Those 8200 miles of logging roads filled the streambeds with gravel and washed out causing mudslides. The clear cuts are an obvious contributor to the increased flooding each spring. I am not at all impressed with Forest Service management. (Individual, Chattaroy, WA - #5248.83100)

The removal of the trees that shade streams means higher water temperatures. (Environmental/Preservation Organization, No Address - #1826.83100)

The clear cuts they enabled have caused erosion resulting in the siltation of thousands of miles of streams. (Individual, Scotts Valley, CA - #9752.83210)

UNTIL WATERSHED AREA UNITS CAN BE IDENTIFIED

All road building and logging (including road maintenance) should be halted until watershed areas can be identified as a unit. This is of particular interest to my bio region (Brice Creek). (Individual, Cottage Grove, OR - #760.83100)

BAN CATTLE AND OFF-HIGHWAY VEHICLES

All cattle and ORVs should be off limits in riparian areas. (Individual, Richfield, OH - #1048.64150)

Our forests are far more important for their water retention and water quality services to the public than any other economic feature. Commercial grazing is damaging to plant and animal diversity and to stream banks and water quality. (Individual, San Francisco, CA - #4009.83140)

Public Concern: The Forest Service should allow timber harvest.

Watershed health. This is an issue that the Southern Timber Council raised in their scoping comments, March 30,1998, which seem to have been ignored. We repeat their concern that the Administration refuses to accept and/or acknowledge research to-date that supports the ability to have roads and timber operations while still protecting water quality. This is supported by the following research:
1) Coweeta Hydrologic Laboratory. This is a 5,400-acre site that "constitutes a living hydrologic laboratory. Over the more than 50 years that this laboratory has operated, forest hydrologists have measured the amounts and timing of rainfall, evaporation and streamflow in the forest" At Coweeta, there is Watershed 28, a multi-resource forest management demonstration site. Based on management on Watershed 28, including timber management. "[T]he increase in water yield that follows timber harvests is particularly important to managers of municipal watersheds. They learn here that water yield is increased in proportion to the percentage of timber cleared or thinned. In the first year after cutting, increase in streamflow on this watershed would have supplied the needs of well over 1,000 people. Water quality was unimpaired. This experiment clearly demonstrates the opportunity for compatible management of a variety of forest resources." (Coweeta Hydrologic Laboratory A Guide to the Research Program, October 1984.) (Timber Company/Association, Kalispell, MT - #53304.83110)

DESPITE PAST DAMAGE TO WATERSHEDS

The fact that the forest products industry has damaged thousands of miles of riparian zones, while USFS and the Department of Interior were forced to look the other way, is unconscionable in my opinion but that doesn't mean we as a nation suddenly evict all forestry product extraction from national forests. (Individual, Fort Collins, CO - #358.83100)

TO IMPROVE WATER YIELD

This state is fast becoming short of water, a valuable resource for everyone including the Forest Service.… It is a well known fact that these large trees use over 100 gallons per day to exist…. Our streams in the Beaverhead/Deerlodge region need the water for stream flow that the mature trees are capturing before the water has a chance to even get to the streams. Managed harvest must be allowed. (Individual, Whitehall, MT - #2333.83130)

With regards to watershed, it has been documented that the watershed is increased with the number of aspen trees that are allowed to grow. In order to encourage the growth of aspen trees enough of the conifers must be removed to

allow for this growth. If the removal of conifers is abated, the watershed will be directly affected by the lack of growth of the aspens. (Individual, Manti, UT - #26036.83100)

Public Concern: The Forest Service should consider the effects roads and road construction have on watersheds.

DRAINAGE PATTERNS

Runoff from roads causes increases in sedimentation. Erosion caused by roads can greatly increase the potential for slope failure during large and episodic storm events causing catastrophic debris flows. Roads alter the natural drainage patterns. For example, steeply cut slopes intercept subsurface flows, converting them to surface runoff. Drainage ditches and berms concentrate flows in channels, efficiently delivering sediment to streams. The most direct impact to streams occurs when roads are constructed by placing fill material in drainage channels. That fill becomes part of the drainage system and, given enough time, is deposited in rivers and streams. (Individual, Bellingham, WA - #8602.83100)

Page 3-40. Channel Morphology. Paragraph 1. The statement is made that "Roading and vegetation management have the potential to change stream channel morphology. Alluvial streams normally exist in a state of dynamic equilibrium, where stream shape (slope, width, depth, sinuosity) adjust to incremental changes in sediment and water inputs but retain the same general shape over time. Sizable changes in sediment and water inputs can throw the channel out of equilibrium, causing it to adjust to a different form with very different functions and values." Comment: I note there is no discussion of flooding changing streambeds, etc. I can think of several news reports which document this happening. Therefore, although the statement as written may be literally true, I do not believe you have scoped the entire problem. A rewrite is needed. Paragraph 2. The statement is made that "Large additions of sediment or removal of water can reduce the stream's ability to transport sediment, causing the channel to aggrade. Sediment inputs from landslides or reductions in water flow in the channel through diversions or ditch placement can cause these changes. Reducing normal sediment loads or increasing the flow in a stream can increase sediment transport and cause the channel to cut into its bed or banks, degrading the channel system." Comment: This statement is not quantified. It is impossible to assess the severity of the threat. (Environmental/Preservation Organization, Davis, CA - #29925.83220)

SEDIMENTATION

Roads have been found to be the main source of sediments released into our streams and rivers. The increase in sedimentation impaired the water quality of streams and rivers that are the major source of our drinking water. I am concerned with the trend of a declining quality of our drinking water. Also the increase in sedimentation has adversely affected salmons and other aquatic species. Salmons in particular prefer streams with clear water with low sedimentation level for their habitat. (Individual, Fresno, CA #8373.83100)

Stop all plans for new roads. The landslides caused by logging/roadbuilding contribute to landslides and turbid water. (Individual, Portland, OR - #9198.83100)

Begin inventorying and closing old roads that are contributing to stream siltation and poor water quality. (Individual, Kenna, WV - #8063.84610)

Public Concern: The Forest Service should address the handling of toxic substances in roadless areas.

We believe that in order to lessen the need to implement the CERCLA or Oil Pollution Act, toxic materials and other hazardous materials should not be transported through or flown over roadless areas. Precaution would reduce the possibility of having to construct emergency roads through the last remaining roadless areas. Helicopter response teams would most likely be faster and much less expensive to the ecosystem than logging through the forest to make a road. (Environmental/Preservation Organization, Weldon, CA - #16041.83000)

Mining and drilling: safe and sanitary disposal of tailings and toxic substances to safeguard our rivers, lakes and aquifers. (Individual, Albuquerque, NM - #10949.93500)

Public Concern: The Forest Service should address the effects of log dumps on the marine environment.

Another concern that argues in favor of roadless area protection for the Tongass is the detrimental impact of log dumps on the marine environment. Log dumps deposit bark, woody debris and sunken logs that accumulate on the water bottom where they alter the substrate, bury surface organisms and promote decomposition which robs the water of oxygen…In one study, bark depths of greater than 1 inch were enough to exclude certain mollusks….In another, researchers found noticeable reductions in benthic infauna at all active and inactive log dumps…Another study found that just six centimeters of bark from an active log dump was enough to reduce the survival of two species of bivalves….By limiting all logging to areas with existing roads and infrastructure, there is virtually no need for new log dumps serving the Tongass National Forest from logging and new log dumps will protect the marine environment from new pollution. (Environmental/Preservation Organization, Anchorage, AK - #29839.83510)

5.12.2 Adequacy of Analysis of Watersheds and Water Resources

One county official from Minnesota asks the Forest Service to conduct additional analysis of agricultural/industrial pollution on watersheds. This official feels that acid rain generated by these activities contribute more to poor water quality than timber harvest and road building. Many respondents feel that protection of roadless areas is necessary for the conservation of clean drinking water. However, one feels that sources of clean drinking water are affected more by weather and proper forest management, and less by preservation of roadless areas.

Some respondents feel that the importance of forests for water retention needs further consideration. They think that forests are vital for the proper retention and release of water to dependent downstream areas. Several respondents are concerned that the proposed rule will negatively impact access to water resources and diminish the ability of municipalities to manage their water supply. Still others are concerned that the proposed rule will hinder the ability of local authorities to address Total Maximum Daily Load problems.

One respondent asks the Forest Service to revise sections of the proposed rule dealing with water resources to include recent scientific information. They feel that recent publications should be used in the analysis. Respondents request inclusion of a map showing the location of impaired watersheds in relation to roadless areas. Others would like to see an assessment of forestry practices and other actions conducted on private inholdings and adjacent lands in the cumulative effects analysis for water quality. They feel that the Forest Service is responsible for studying the quality of water affected by forestry practices on lands not managed by the Forest Service.

Public Concern: The Forest Service should consider the effects of agricultural/industrial pollution on watersheds.

There is strong inference in this EIS that roads and timber management practices are the leading factors that have a negative impact on the nation’s drinking waters. This statement is over inclusive and should strongly advocate

federal action where there is a problem. In northeastern Minnesota the issue is NOT roads and timber management but acid rain. The acidity of the rain and snow is not a by-product of road construction and timber harvesting but is the by-product of industrial pollution from outside of the area. The BMP for water quality in Minnesota has provided guidelines for road construction and timber harvesting that preserves water quality. If the federal government is really concerned about water quality of the nation, then their energy should not be put into a smoke screen directed at road construction/reconstruction and timber management in or near inventoried roadless conservation areas. The federal energy should be put into agricultural/industrial pollution. (County Elected Official, Grand Marais, MN - #43757.83140)

Public Concern: The Forest Service should consider the importance of roadless areas as sources of clean drinking water.

ROADLESS AREAS ARE IMPORTANT

Millions of Americans rely on our National Forests for sources of clean drinking water. Wild forest areas contain some of the cleanest sources of drinking water in the country. (Individual, Fayetteville, AR - #6991.83000)

Science has shown that healthy roadless forests are needed to maintain healthy watersheds. Watersheds are the parcels of land that provide consistent supplies of clean drinking and irrigation water to rural communities throughout New Mexico. Many of our most important roadless areas are the tops of these key watersheds. (Individual, Albuquerque, NM - #7283.83100)

When the children of the mountain regions of the U.S.A., fifty years from now, ask their parents for a drink of clean water will the parents say to their children: “there is no clean water to drink because the USDA Forest Service did not protect the watershed”? (Individual, Boise, ID - #7969.83140)

ROADLESS AREAS ARE NOT IMPORTANT

In your publication FS-670 under the heading Background you list six public benefits [of roadless areas] my comments on each follows:
Sources of clean drinking water - With or without the roadless area proposal the forest would provide clean drinking water depending on the weather and proper forest management. (Individual, Idaho Falls, ID - #7108.83000)

Public Concern: The Forest Service should consider the importance of forests for water retention.

…just a few square feet of foliage can hold quite a bit of water. It made me understand more clearly what those who work in the woods have been saying for decades: Forests can hold immense amounts of moisture. (Individual, Seattle, WA - #7535.81000)

Healthy watersheds soak up rainfall and snowmelt like a sponge and release it into our rivers and streams slowly throughout the year. (Individual, Albuquerque, NM - #7283.83100)

That’s right fellas, fall trees, kiss the water table goodbye! Friend of mine used to live across the road from Dabney State Park (on the Sandy River). He told me his neighbor had some timber up on a hill just behind his place. Man wanted some money so he got some loggers in there, took out four or five loads of nice big trees. That’s all he did. MY friend lost his spring in about two months; nice little spring, ran maybe fifty gallons a day; without the trees, no water; it’s a lesson people, are you listening? (Individual, Gresham, OR - #7657.83140)

Public Concern: The Forest Service should address the effects of the proposed action on the access to water resources.

This initiative could severely impact the economy in Delta County due to the following: Water Resources: Access and development of water resources for municipalities and agriculture in the County will be negatively impacted. (County Elected Official, Delta, CO - #17266.83100)

Public Concern: The Forest Service should address the effect of the proposed rule on the ability of local authorities to address problems associated with the Total Daily Maximum Load.

The proposed rule and other Alternatives will not resolve the Total Daily Maximum Load (TMDL) associated with water and these undefined roadless areas. Water is under the primary jurisdiction of the State. Roads are commonly blamed for the siltation of rivers and streams. If the roads are properly constructed and maintained the impact should be minimal. The TMDL specifications are necessarily based upon the historic and actual conditions of the individual stream or river. Many natural components can cause a rise in siltation, salts, minerals, or other pollutants in these rivers and streams. The roadless area proposal will not resolve these changing conditions, however, the proposal may impair the ability of the respective authorities to address the problems that might arise and those which are feasibly correctable. The decommissioning of roads and their reclamation are always local in nature and should always be left to local management decisions. (Individual, Douglasville, GA - #18185.83110)

Public Concern: The Forest Service should revise sections of the proposed rule dealing with water resources to include recent scientific information.

SECTIONS ON WATER MUST BE REVISED TO REFLECT LATEST SCIENTIFIC INFORMATION. NEPA requires that analysis and decision be based on the best available information. The section and analysis on watershed health and water yield, quantity, timing and etc. beginning at p.3-22 in the DEIS must be revised to reflect the Forest Service document entitled Water & The Forest Service, USDA, Forest Service, FS-660, January 2000. (Environmental/Preservation Organization, Cave Junction, OR - #16188.83100)

Public Concern: The Forest Service should indicate where impaired watersheds are located in relationship to roadless areas.

Comment: Page 3-28-- The discussion on impaired watersheds does not indicate where they are located and their relationship to roadless areas (except for the very small scale map in Figure 3-13). Since many of these watersheds have an impact on local communities, they need to be identified in order that local government officials can adequately assess the impacts of the alternatives. Relief: The Forest Service must provide a list of impaired watersheds nationally by roadless area and county. Only then can local government officials determine the effects of the alternatives and provide meaningful comment. (County Elected Official, Worland, WY - #16185.82000)

The discussion on impaired watersheds does not indicate where they are located and their relationship to roadless areas (except for the very small scale map in Figure 3-13). It would be nice to understand the status of the watersheds in Beaverhead County, since water is one of our most valuable and often limited resources. Without this data, meaningful comment on this issue at this time is impossible. (County Elected Official, Dillon, MT - #17297.83110)

Public Concern: The Cumulative Effects Analysis for water quality should include an assessment of forestry practices and other actions conducted on private inholdings and adjacent lands.

The Forest Service fails to acknowledge that it is not the only property owner whose land use practices influence water quality and wildlife. Especially in those lands in the northern, eastern and southern regions of the country, the Forest Service must analyze the status of water quality and documented impacts from forestry practices. For example, the Environmental Protection Agency recently proposed to require some timber suppliers to apply for a NPDES permit. While this proposal was shot down due to lobbying pressure, the fact remains that poor forestry practices contribute to the sedimentation of streams and waterways. The Forest Service must analyze other landowner's actions in its cumulative impacts analysis (A passing reference is found in figure 3-13 entitled "Watersheds that Do Not Meet Clean Water Act Standards that Contain Inventoried Roadless Areas" with the caveat "Impairment may come from any ownership within the watershed, not necessarily NFS lands.") (Environmental/Preservation Organization, Plymouth, MN - #51067.82000)

5.13 Soils

Erosion, sedimentation, and other impacts to soils are of concern to many respondents. Some respondents feel that timber harvest and road construction on land with steep erosive slopes should be curtailed. Several specific concerns are expressed about protection of unique geologic formations. Karst formations and cryptobiotic soils are just a few examples of geologic treasures respondents wish to see protected.

In addition to these general concerns, respondents' comments are divided into two subsections: Subsection 5.13.1 Effects of Other Activities on Soils; and Subsection 5.13.2 Adequacy of the Analysis of Soils.

Public Concern: The Forest Service should not manage lands on steep slopes or with poor and erosive soil.

With few exceptions, Forest lands not already roaded are not suitable for any sort of intensive management. The USFS has been spending tax payer money like water for the past fifty years trying to intensively manage site class 4 and 5 lands on steep slopes, poor and erosive soils. It is time to stop the practice. (Individual, No Address - #5137.10100)

I am a retired Forest Service employee with over 30 years of service. I was involved with RARE I, RARE II, and the first round of forest planning. I served on the R-4 Regional I.D. Team that reviewed and provided input into all of the forest plans in the region. Even though many good plans were prepared and implemented, I became increasingly concerned with the amount of road construction and logging within the national forests, particularly in the Intermountain Region. Over the past several years, I observed many instances where roads were constructed on steep to very steep slopes and in soils where roads should never have been located. Timber was cut in stands where soils are of very marginal productivity. Costs of reforestation were most generally very high. Economic analysis would show negative cost recovery in almost all instances. Many roadless areas that, in my opinion, should have been classed as potential wilderness were thus eliminated from possible future wilderness classification. (Individual, Driggs, ID - #6846.10300)

Public Concern: The Forest Service should protect unique geologic formations.

Roads have become the cash cow. Like the cattle grazing on public lands, logging roads adversely affect soil and water distribution. Roads in the Tongass cannot help but be built over karst formations. The presence of these special geological formations make the old growth forest possible. Protection of the karst has been neglected in the log harvesting process of the past and in recent timber sale proposals. The Indian River timber sale near Tenakee Springs neglected to consider the importance of the karst and the degradation that would be caused by road building over karst formations. Even though this fact was pointed out throughout the NEPA process, the Forest Service did not change its position until there was an administrative appeal filed by local organizations. The Forest Service's usual response to such complaints is to summarily state that it will take care of the problem during the logging process. That the logger will build a road that will not do what any person who sees the road knows it will destroy habitat, destroy the karst and ultimately destroy the ecosystem. There is no difficult science to understand. We have seen the same thing happen all over the world. Just one more road here or there is not supposed to make a difference. When the critical mass is reached it is too late to take back that one or two more roads and their long-term effects. (Individual, Tenakee Springs, AL - #8123.83230)

The fragile, easily compactable pumice soils of the Oregon Cascade Recreational Area (OCRA) are currently unprotected from motorized recreation. Most worrisome are the people emulating Ford advertisements doing "donuts" over the rare, fragile, flat, volcanic soils. The draft roadless EIS not only allows this to continue in the OCRA, it allows this to continue in all inventoried roadless areas covered under the preferred alternative. (Environmental/Preservation Organization, Roseburg, OR - #52494.83200)

In addition, growing recognition of the importance of cryptobiotic crusts to ecosystem processes has led to concerns about the impacts of recreational users and nonnative grazers on such surfaces. On most semiarid lands, a single pass of an off-road Vehicle will reduce nitrogen fixation by cryptobiotic crusts and increase wind and water erosion (see Davidson et al. 1996:110-111). Vehicular traffic directly destroys biological resources by crushing vegetation and microbiotic crusts and retards revegetation through soil compaction. ORV (ATV INCLUDED) USE, THAT MOST FRIVOLOUS AND DESTRUCTIVE OF RECREATIONAL PURSUITS, MUST BE PROHIBITED FOR THE PROTECTION OF RESOURCE VALUES. (Environmental/Preservation Organization, Flagstaff, AZ - #43415.83200)

I would like to point out something I observed last summer on a hike into Independence Lake in the Boulder River roadless area which I think is valuable and worth preserving. On the day I hiked in[,] the trail had recently been groomed by a trail crew which meant that the uphill side had been cut away. This cut revealed a white chalk line about two to four inches below the surface of the forest floor. Several people in the group speculated about what it could be when the geologist in the group informed us that it was ash from the Mount Saint Helens eruption. Here in this roadless area a new "rock layer" was being formed beneath our feet. Should logging or mining activities or even ORV activities be allowed in this area, this rock formation would be destroyed in its infancy. The geologic event of May 20, 1980 was a once-in-a-lifetime event for those of us living in the Northwest and I think that everything created by that event deserves protection. (Individual, Clear Lake, WA - #18517.83230)

5.13.1 Effects of Other Activities on Soils

Respondents ask the Forest Service to consider the effects of certain activities on soil erosion. Many believe that roads and road construction are extremely damaging to soil stability. They would like to see restoration of roaded areas to prevent further erosion. Respondents think that ORVs add to the erosion problems experienced on National Forest System Lands. Alternatively, Some respondents point out that erosion and landslides are a natural part of the environment. One individual points to a study indicating that most landslides occur in areas devoid of roads.

Another respondent raises the concern of soil bacteria introduction. This person feels that road construction leads to unforeseen ecosystem changes that may then lead to deforestation.

Public Concern: The Forest Service should consider the effects of certain activities on soil erosion.

ROADS AND ROAD CONSTRUCTION CAUSE EROSION

On the steep slopes that many logging roads are constructed on, roads contribute to soil instability that can start massive soil erosion and even mudslides. (Environmental/Preservation Organization, No Address - #1826.83210)

Taking steps to restore road areas to their more natural state will prevent erosion and bring back continuous areas for plants and animals to begin to come back. Not building more roads will of course keep this headed in the right direction. (Individual, Port Townsend, WA - #13818.83210)

I would like to see elimination of roads and restoration of roaded areas in any places where roads cannot be maintained so as to prevent erosion. (Individual, Missoula, MT - #10874.83210)

OFF-HIGHWAY VEHICLES INCREASE EROSION

Off-road vehicle use exacerbates the erosion on existing roads and provides opportunities for soil disturbance on lands adjacent to roads. (Individual, Mckinleyville, CA - #1024.83210)

Under natural conditions, moist soil in the Western region of the Mojave Desert (typically a loamy sand soil type) has such high infiltration capacities that it would require rainfall of 40 to 60 mm/hour for 20 minutes to generate runoff. On ORV compacted areas, ponding and runoff were documented with less than 10mm/hour rainfall which, in turn, results in trail widening. Hence, compacted areas are subject to more frequent erosion by overland flow resulting in even greater impacts to desert vegetation. A study was conducted in the Turkey Bay ORV area, the first federally managed ORV area, located between Kentucky and Tennessee. The soil in this area is composed of shallow loess over gravel and chert with alluvial deposits of clay, silt, and gravel along higher elevations. As a result of ORV activities, a significant increase in soil erosion, particularly on slopes of 15 percent or more has been documented. (Environmental/Preservation Organization, Plymouth, MN - #51067.83210)

EROSION IS NATURAL

On page 3-38 you state that studies showed that roads and timber harvest were major causes of landslides. A new study on the Payette done by M. Dixon and L. Wasniewski--"Summary of Landslide Inventory on the Westside of the Payette National Forest from the New Year 1997 Storm", showed that 85.9% of landslides were "NATURAL". (That is areas with no roads or timber harvest). Roads attributed 11.3% and harvest units 2.5%. Another study in the South Fork Salmon River showed over 100 landslides caused by intensive wildfire where there are no roads. It is evident that carefully located and constructed roads are not likely to be candidates for landslides, sedimentation or mass wasting. (Individual, McCall, ID - #6848.82000)

Public Concern: The Forest Service should consider that road construction will introduce soil bacteria.

Building roads will in introduce soil bacteria. Change ecosystems which we don't even understand & eventually lead to deforestation. (Individual, Brule, WI - #13435.83200)

5.13.2 Adequacy of Analysis of Soils

Many respondents fear that protection of roadless areas will lead to uncontrolled fires. Erosion from those fires, in their opinion, will be greater than erosion from forest roads. They ask the

Forest Service to verify the primary contributor to erosion in the forest. These respondents are convinced that fires, not roads, are the real threat to soil stability.

Some respondents call the landslide analysis into question and request an update to the landslide risk map on page 3-37 of the Draft EIS.

One respondent feels that geologic hazard mitigation opportunities will be lost if the proposed rule is implemented. This Wyoming State Agency feels that lack of access will prevent them from mitigating geologic hazards.

Finally, one organization asks the Forest Service to analyze the effects of soil compaction in the environment.

Public Concern: The Forest Service should address the potential for fire induced soil erosion.

Incidentally, several hundred acres of the Bucks Lake Wilderness are an area that was reforested after a wildfire. The trees are now over 20 feet tall. They are also so thick that if a fire starts the fuel loading will create a devastating heat and the area will become a brush field again. This area is prone to lightning. There will be a great amount of erosion as the granitic soils have a tendency to float away should fire start here again. (Individual, Chico, CA - #10596.83000)

Hot fires destroy trees resulting in significantly reduced rooting strength and increased water yield. Many say that wild fires are a natural part of the ecosystem and therefore are good. Hot stand replacing fires in Ponderosa Pine types where frequent low intensity non-lethal fires occurred are not natural, nor is the extreme sedimentation that they cause. The effects of catastrophic wild fires on mass wasting were not considered in the DEIS. (Individual, McCall, ID - #7575.84200)

Public Concern: The Forest Service should verify the primary contributor to erosion in the forest.

Roads may be responsible for some land sliding, but uncharacteristically hot wildfires are responsible for many of the landslides in Idaho from the 1997 storm. Another roadless area that was burnt and pockmarked with landslides is the Lowman area on the Boise NF. Vice President Al Gore visited Idaho after the 1997 flood and told a Boise County Commissioner that the landslides were a result of clear cutting and roads. When the reality was wildfires in roadless areas were responsible for much of the damage. Hot fires destroy trees resulting in significantly reduced rooting strength and increased water yield. (Individual, McCall, ID - #7575.84200)

Montanan’s are being dealt a great disservice if the Forest Service continues this unguided and unwarranted obliteration of roads and labeling of “roadless” areas. They [the Forest Service] have neglected to undertake an objective, unbiased and realistic research project to determine the predicted erosion caused by roads - vs. the massive erosion that has been proven to be caused by the inability to manage a forest due to lack of accessibility and control of the fuel load for wildfires. (Individual, No Address - #9087.83200)

Public Concern: The landslide risk map on page 3-37 of the Draft EIS should be updated.

There are additional hazards-related discussions and updates needed in the document. The landslide risk map on page 3-37 of the Draft EIS is extremely outdated and inaccurate. Since 1982, the WSGS has mapped most landslides in Wyoming, and provided the results to National Forest Service Offices in the State. That initiative is not reflected on figure 3-15 (page 3-37). In addition many of the mapped landslides in Wyoming have dammed or nearly dammed streams or rivers. (State Agency, Laramie, WY - #15888.93500)

Public Concern: The Forest Service should analyze the geologic hazard mitigation opportunities that will be lost if the proposed rule is implemented.

. . .A detailed analysis of geologic hazard mitigation opportunities that will be lost as a result of this proposed action. (State Agency, Laramie, WY - #15888.82000)

2469.ENVIR.918 Public Concern: The Forest Service should address the effects of soil compaction.

Soil compaction results in root damage and decreased root growth, which decrease plants' ability to access nutrients and water. Soil compaction and organic matter disturbance cause a decline in mycorrhizal fungi. Soil compaction results in reduced infiltration rates and increased surface erosion. Soil compaction results in a loss in site productivity as measured by tree growth. Soil compaction after logging resulted in a loss of soil pore space and a 33% reduction in water to plants. Soil compaction by logging reduced the movement of water through the soil (saturated hydraulic conductivity), with increases in runoff predicted. Beneficial soil microorganisms and mycorrhizal fungi occur primarily in soil organic layers. Soil compaction and the disturbance of organic layers of the soil due to logging activities alter soil microbial activity and adversely affect mycorrhizal populations. (Environmental/Preservation Organization, Weldon, CA - #16041.83200)

5.14 Air Quality

Many respondents have concerns about air quality as an essential component for human existence. However, some feel that roadless area conservation may not be the most important action for promoting high air quality. One respondent asks the Forest Service to explain how air quality can be better in roadless areas as compared to managed areas. An individual asks the Forest Service add the proper perspective to this debate by defining where Class 1 air quality areas are in relation to National Forest System Lands. Other respondents agree that roadless areas have little effect on air quality. They point out that “Changes in air quality due to dust, smoke and emissions are short lived phenomena that are present literally everywhere.” This suggests that respondents feel that air quality problems are often caused by natural disturbances and not by activities in roadless areas. They do not want to preclude adoption of Alternative 1 because of changes in air quality.

In addition to these general concerns, respondents’ comments are divided into two subsections: Subsection 5.14.1 Effects of Other Activities on Air Quality; and Subsection 5.14.2 Adequacy of the Analysis of Air Quality.

Public Concern: The Forest Service should explain how air quality can be better in roadless areas as compared to managed areas.

The Forest Service should address the claimed potential benefits of the proposed rule by answering the following questions: How can air quality be better in roadless areas as compared to managed areas? (Individual, Kingsport, TN - #8500.83300)

Public Concern: The Forest Service should define where Class 1 air quality areas are in relation to National Forest System Lands.

In reference to whether Roadless Areas would help maintain air quality, defining where Class 1 air quality areas are in relation to the Forest Service land would help put this element in perspective. (Individual, Moses Lake, WA - #718.83300)

Public Concern: The Forest Service should not preclude adoption of Alternative 1 because of changes in air quality.

Changes in air quality due to dust, smoke and emissions are short lived phenomena that are present literally everywhere. This is not a critical factor, and Alternative 1 should be the preferred choice for all of the other reasons listed in this table. (Individual, Collbran, CO - #19826.83320)

5.14.1 Effects of Other Activities on Air Quality

Carbon dioxide levels are of great concern to many respondents. They would like the Forest Service to evaluate the role of anthropogenic activities on carbon dioxide exchange. They feel that timber harvest exacerbates the already dire atmospheric CO_2 situation. They feel that roads encourage the use of vehicles, which also contribute to the problem. These respondents want these activities to end in roadless areas.

Another activity respondents would like to end on National Forest System Lands is prescribed burning. They feel that “burning only adds to poor air quality” in roadless areas.

Public Concern: The Forest Service should evaluate the role of anthropogenic activities on carbon dioxide exchange.

It should also be noted that by destroying the forests, we are adding to the destruction of the planet in many ways. To begin with, cutting down forests for roads inevitably leads to commercial build-up, which involves the destruction of even more forest. Not only are we adding CO2 into the atmosphere directly by encouraging automobile use and industrial and commercial growth, we are also increasing the green house effect by removing a sink for the CO2 that is already too abundant. Furthermore, when the forest is removed to clear the area for roads, the methods used to clear the forest often release even more CO2, either directly from burning the trees, or indirectly during the decomposition of the organic matter. I understand that this may seem trivial compared to the other sources of CO2 emissions, but you must realize that the same amount of CO2 is released by logging 20,000 hectares of forest as is released each year from automobile emissions in Southern California. (Individual, Denver, CO - #4519.85100)

I would like to talk about a slightly different angle, and that is that these activities on roadless areas and elsewhere -- logging, mining, grazing and off highway vehicle use -- have severe carbon consequences. When they occur, carbon is released from trees, plants and soil on the land where they're occurring, and it goes into the atmosphere where it forms carbon dioxide and exacerbates climate change. Worldwide, the Intergovernmental Panel on Climate Change recently concluded human impacts on the land, mostly deforestation, caused 20 percent of the CO2 emissions every year. Science by scientists who have worked for the United States Forest Service show that when an old growth forest is logged in the Pacific Northwest, it takes 250 years or more for the tree plantation which is planted on that ground after the forest is logged to regain the carbon that was emitted when the forest was logged and in its immediate aftermath. It's kind of easy to see why carbon is emitted when old growth trees are logged because a tree is largely an enormous living thing which is made principally of carbon, oxygen and hydrogen. However, grazing and off highway vehicle use always cause a lot of carbon emission because they disturb the soil, and the IPCC also concluded recently that about 50 percent of the soil, of the carbon and soils, in forests and far more of the soil in deserts and range lands is contained in the soil. The U.S. is not the world's leading CO2 emitter from deforestation. That dubious honor is held by Brazil, but the U.S. is the world's leading CO2 emitter in total, and the U.S. must lead on stopping CO2 emissions from its forests and from other wild areas. (Individual, Washington, DC - #21326.85100)

Public Concern: The Forest Service should refrain from performing prescribed burns in roadless areas because of their effect on air quality.

Forest Service said improved air quality in roadless areas, and then they turn around and say that they will have to do prescribed burns to keep a healthy forest, that was done by logging before. Burning only adds to poor air quality, and we know how prescribed burns destroy a lot of country. (Individual, Salmon, ID - #8581.83310)

5.14.2 Adequacy of Analysis of Air Quality

The public would like the Forest Service to conduct further analysis on the effects of the proposed rule on air quality. Some feel that without access to roadless areas, fire risk will increase and the resulting fires will cause diminished air quality. On the other side of this argument, respondents feel that air quality is already compromised by the presence of roads and motorized vehicles in the forest. County officials from Wyoming worry that unplanned wildfires resulting from roadless area conservation will not give citizens with respiratory problems enough time to prepare. They request that air quality changes resulting from this rule on lands adjacent to Class 1 airsheds also be analyzed.

Some respondents think the Forest Service should offer a more complete discussion of the effects of trees on air quality. They see trees as crucial for maintaining air temperature and reducing air pollution.

Others feel that the amount of air pollution created by snowmobiles should be more carefully analyzed. One respondent asks the Forest Service to acknowledge that significant air quality problems on National Forest System lands do not originate on those lands; rather, forest air quality is affected by off site sources.

Public Concern: The Forest Service should address the effects of the proposed rule on air quality.

With limited access to provide pre-suppression and suppression actions the increased fire risk will result in added air quality loss which we experienced last summer from the Trinity fires. (Individual, Ukiah, CA - #7274.83300)

I visited our mountains last weekend and was appalled at the change in air quality due to development. What were once beautiful, far-reaching vistas are now hidden by ugly, yellow haze. NO MORE ROADS! (Individual, Marietta, GA - #2071.83300)

These forests also affect the quality of our air; our weather is being terribly affected, as is, of course, our wildlife. We cannot expect other countries to save their rainforests if we cannot save our own! I fear that we are fast approaching the time when we will have to wear air-filter masks every time we step outside. (Individual, Gates, NC - #4731.80000)

Comment: Page 3.46, second paragraph—The "proposed action" makes no mention of the effects posed to local residents with respiratory problems resulting from amounts of smoke associated with large wildfires. Contrary to planned management actions, where these residents can be forewarned and take appropriate preventative actions, this in not possible in the early stages of wildfires.
Relief: The Forest Service must address this impact and disclose the potential adverse effects. (County Elected Official, Basin, WY - #43980)

Comment: Page 3-43, second paragraph-- There is no analysis in the cumulative effects sections for any of the alternatives addressing the statement that "all management activities on National Forest System Lands must consider air quality related values for all Class 1 areas managed by an agency, not just those on Forest Service lands." The cumulative effects of any proposal in this context must be addressed. What, if any, will be the effects of this proposal on the programs of the other agencies and Native American Tribes? How could their management affect the air quality on adjacent Class 1 airsheds managed by the Forest Service? For example, where a tribe might accelerate its timber harvest program to help respond to an increase in demand for timber products resulting from decreased harvest in roadless areas? Relief: The Forest Service must address this issue in a cumulative effects analysis. (County Elected Official, Worland, WY - #16185.83300)

Public Concern: The Forest Service should discuss the effects of trees on air quality.

We need trees to live. Hey people wake up and look at your first and second grade science. The trees clean up the mess we make in the air. The more we remove and destroy the worse our air is going to become. There is enough being used for mining and timber and we certainly don't need more roads for more cars to drive on to pollute more of our air. We need to search for alternatives. (Individual, Loganville, GA - #5305.83000)

The U.S.N. Forests belong to all, the many people of [the] U.S.A. Their most important and universal contribution is to clean and cool the air that is necessary for the life of the people of this nation, our children and grandchildren. There should be no use of or in the forest to divert it from producing cool clean air that serves all the people. (Individual, Hiawassee, GA - #8075.92300)

Public Concern: The Forest Service should evaluate the amount of air pollution created by snowmobiles.

Stop spreading the lies these extreme environmentalists are spewing. Why would anyone believe that snowmobiles in Yellowstone National Park cause more pollution in one day than all the pollution of Los Angeles, California on a given day? That's ridiculous!! The emission and sound volume on snowmobiles has, and continues to be addressed by the snowmobile manufacturers. They are continually at work to drastically reduce sound and emissions! How

long did GM have to address these issues on autos? Who's spending the big bucks on this? Do these extremists really believe the public is that stupid!!? (Individual, No Address - #9912.83300)

Public Concern: The Forest Service should acknowledge that significant air quality problems on National Forest System lands are not due to sources on those lands.

The whole Ecological Factors-Air Quality analysis really is rather silly. The impacts from vehicles and machinery potentially allowed in "roadless areas" will be microscopic even under Alternative 1. There will be so few of them that there will not be any significant impacts even at the most localized level. The contribution of air toxics such as carbon monoxide will barely be measurable let alone significant in any meaningful way. Under the most pessimistic conditions described in the DEIS, these vehicles will not release enough NOX or ROG to initiate ozone formation or make a significant contribution to existing problems. As for particulates and visibility, the "regional haze that now affects virtually all Class I areas" stated in the DEIS would not be improved even by banning all human activity on the inventoried roadless areas because forest lands are not the source of the problem. Except in the short-lived case of smoke from forest fires and prescribed burns, and there really is no feasible way to eliminate that. EPA has based a good bit of their approach to Class I area visibility on 'Protecting Visibility in National Parks and Wilderness Areas' by the National Research Council. That report states: Visibility problems in Class I areas are mostly the result of regional haze, rather than the effect of emissions from one or a few individual sources at specific sites. Therefore, a strategy that relies only on influencing the location of new sources, although perhaps useful in some situations, would not by itself prove effective. Moreover, such a strategy would not, of course, remedy the visibility impairment caused by existing sources. Further, the DEIS implies that Class I areas and roadless areas are geographically connected, which is often not the case as Figure 3-16 amply demonstrates. Claiming that roadless areas will act as a buffer for Class I areas is discredited by 1) the roadless areas are already there acting as buffers, and 2) Class I areas are already being impacted according to the DEIS. Additionally, none of the action alternatives actually seek to minimize road-related emissions as the DEIS claims. No restrictions are presented anywhere that would control numbers of vehicles, only places where roads will not be built in the future so there are no long-term benefits to be realized because there will be no minimization. The bottom line is that any chronic air quality "problems" that exist on public forest lands are not due to sources on those lands. The sources are regionally dispersed and beyond the control of USFS. Any long-term impacts originating from activities on the DEIS-relevant lands will be insignificant. (Individual, Fort Collins, CO - #19429.83300)

5.15 Global Effects

Some respondents believe that roadless area conservation will mitigate global environmental problems and some respondents believe that it will fail. Many respondents feel that roadless area conservation is critical to mitigating these problems. However, one respondent points out that removal of these areas from possible timber harvest will prevent forest managers from practicing the CO_2 mitigation technique of carbon farming. One respondent feels that national policies should be aimed at minimizing the consequences of global warming and drought, and that this policy fails to do that.

Many respondents feel this proposal will place undue timber harvest pressures on forests outside the United States. They feel that the increased importation of foreign forest products resulting from this rule will have harmful effects.

Respondents assert that the Forest Service should avoid accessing new areas until we understand more about green house warming and global climate change, and that the roadless area

conservation plan is an important step in that direction. They feel that this proposed rule would be beneficial for world ecological welfare.

Public Concern: The Forest Service should consider the effectiveness of roadless area protection in mitigating global environmental problems.

PROTECTION WILL HAVE A POSITIVE EFFECT

The management of public lands, i.e., roadless proposal, should be determined solely by scientific evidence of the overall health of our nation's forests, public and private. We have lost so much biodiversity. Global warming is threatening the existence of all habitats. Preservation and extreme conservation is way overdue. This nation is selfish and wasteful. By preserving roadless areas we can help fight excess waste, gluttonous consumerism, global warming and habitat fragmentation/species extinction. (Individual, Visalia, CA - #509.80000)

Throughout the world and within our own country we are losing plant and animal species left and right. Glaciers are receding in Montana, the ozone hole is the biggest ever, let's please protect our roadless areas A.S.A.P. (Individual, Edwards, CO - #913.80000)

These remaining roadless areas have many crucial ecological functions. They are a great carbon reserve and play an important role in absorbing carbon and countering the buildup of greenhouse gases in the atmosphere. (Individual, Cottage Grove, OR - #1056.85100)

New roads into the Tongass and Chugach forests will presumably be built with fossil-fuel-burning equipment and would be used by fossil-fuel-burning vehicles, exacerbating the global warming and global climate change problems, threatening the health of these forests and of all Earth forests. Other Alaska forests are presently suffering stress and insect damage, at least partially, probably, from GW in Alaska. Therefore, we should build no new roads in the Tongass and Chugach forests. (Individual, San Marcos, CA - #6847.85100)

PROTECTION WILL HAVE A NEGATIVE EFFECT

Our most pressing environmental problem is rapid accumulation of global carbon dioxide and other greenhouse gasses. The EIS has failed to address how the roadless initiative will contribute to the long- term climate change as a result of avoiding carbon farming on public forest lands. (Individual, Missoula, MT - #2280.85100)

Public Concern: National policies should be aimed at minimizing the consequences of global warming and drought.

The Clinton/Gore administration has this perverse notion of global warming, yet presents a case here to do nothing to effect positive change. As is well established in science, available moisture is the key to plant growth and vigor. If we truly are headed toward global warming, or even just a plain old fashioned drought, it seems that our national policies should be aimed at minimizing the consequences. (Individual, No Address - #8442.85100)

Public Concern: The Forest Service should address the resource pressures the proposed rule would place on global forests.

If the Forest Service insists on going forward, a new NOI should be developed that includes: resource pressures this decision would place on global forests. (Individual, Titusville, PA - #905.85000)

There are many nations that have yet to implement some sort of an environmental protection program.

The demand that will be placed on other countries to satisfy the needs of the American people if this EIS is approved has not been studied. In an era where global environmental issues like global warming and ozone depletion are hot topics, the cumulative impacts on a global basis needs to be analyzed and brought before the American people. The study should also include a discussion of international conflicts with the United States since it is conceivable that it may be the only country left with key natural resources. (Individual, Chico, CA - 10596.8500)

Environmentalists like to believe the recent ascendancy of the service/technological economy and the decline of the resource extraction economy supports the need for less productive land than before. Nothing could be further from the truth. While resource extraction has declined in the US, it is primarily due to overly protective management and endless litigation. It has actually increased on a worldwide basis. When you consider that 4 out of every 10 houses built in the US today is constructed with wood procured from outside our borders, then a case can be made that our overly restrictive laws contribute to third world deforestation. We are simply exporting our natural resource demand to other countries, most of who do not have the sound environmental laws that we do. We should be maximizing the responsible production of natural resources, consistent with ecosystem health and sustainability, rather than further reducing it. In fact, we have a moral responsibility to do so in order to be a good world citizen. (Individual, Bend, OR - 5725.84500)

The reduction of available timber from the Forest Service land has already created a 35% increase in imported lumber from foreign countries. The majority of this lumber is coming from countries that do not have any forest practices in place. (Individual, Dalton Gardens, ID - #21440)

Public Concern: The Forest Service should address the importation of forest products.

There is a serious problem of importing forest products. It is only a matter of time until a particular insect or disease is imported and released that will have a devastating effect throughout our forests. There are many examples of an introduced forest pest through our forestry history. (Individual, Columbia Falls, MT - #720.84300)

Public Concern: The Forest Service should avoid accessing new areas until we understand more about green house warming and global climate change.

We are still discovering the mechanisms by which these forests perform valuable services for Earth's biosphere, such as carbon dioxide sequestration. Until we can better understand and value these services, we should demur from invading new stretches of forest with roads, some of which will lead to increased timber harvest, and consequent dispersal and decomposition of carbonaceous biomass, before we understand the benefits and costs of such roaded invasions. We need to manage the Tongass and Chugach forests with urgent attention to the phenomena of increasing atmospheric concentration of carbon dioxide, and of consequent global warming (GW) and global climate change (GCC), because these forests are enormous sites of sequestered carbon and of large natural and potential man-made carbon fluxes. The highest and best use of these forests may be for removing and sequestering atmospheric carbon dioxide; we don't know that, yet; we don't know how to manage for optimum carbon sequestration, yet. This argues for avoiding accessing new areas of these forests by road until we know more about these GW and GCC mitigation options. In an April, 2000 report, the UN-sponsored Intergovernmental Panel on Climate Change (IPCC) concludes, "that there has been a discernible human influence on global climate", and that "three of the last 5 years have been the warmest in the instrumental record", which goes back 140 years. [[reported in Science, 28 April 2000, vol 288, p. 590]] (Individual, San Marcos, CA - #6847.85100)

Public Concern: The Forest Service should implement the proposed rule for world ecological welfare.

I agree that local interests should have some say-so in how to use land reserves, but I also believe the federal government has a duty to regulate such local concerns, which are often blinded to the larger interest of national and world ecological welfare. (Individual, Madisonville, TN - #6421.41000)

Chapter 6 Human Uses and National Forest System Land Management

This chapter presents the range of public comment discussing human uses of the national forests, and roadless areas in particular. Given that the Notice of Intent proposed possible restrictions on "all activities . . . that do not contribute to maintaining or enhancing the ecological values of roadless areas," and that the set of action alternatives analyzed in the Draft Environmental Impact Statement (EIS) are prohibitionary in nature, almost every response to the Draft EIS addresses human uses of national forests in some way.

A great many people who generally favor a roadless conservation rule feel that the Preferred Alternative does not meet the mandate of the president or the purpose described in the Notice of Intent. These respondents request a wide array of further restrictions, especially in regards to timber harvest, mining activities, and motorized recreation. They feel that both ecosystem health and roadless values are unacceptably compromised because the proposed rule does not directly address commodity and recreational activities.

Opponents to the proposed rule feel that broad multiple use management should be practiced in roadless areas and does not harm the environment. Current management of the national forests provides ample opportunity for addressing management of roadless areas and threats to the ecological health of roadless areas are greatly exaggerated, many say. A wide variety of recreationists and commercial users feel their use of the forests will be unreasonably restricted by the proposed rule or by the likely restrictions they believe will follow thereafter.

These concerns are elaborated in the following sections of this chapter: 6.1 General Management Considerations, 6.2 Travelway Infrastructure Management, 6.3 Commodity, Extractive and Commercial Activities, 6.4 Wildlife-Dependent Activities, 6.5 Non-Timber Forest Products, 6.6 Cultural and Heritage Resources, 6.7 Recreation and Travel Management, and 6.8 Land Ownership.

Related concerns specifically addressing the alternatives are found in Chapter 4; concerns that focus on specific environmental impacts of various human uses are found in Chapter 5.

6.1 General Management Considerations

Many individuals express the strong sentiment that as taxpaying citizens, they have a right to enjoy the national forests as they see fit without excessive government interference. "The people own the land, not the Forest Service. We have the right to use it, all of it, for our living needs," contends one individual. Conversely, another respondent points out that individuals by law cannot simply do anything they wish with federal property. "I cannot, as a citizen of this country, go into any federal office and begin commandeering people's staplers, copy paper, and desk chairs just because 'It's my money.'" This principal applies equally to National Forest System lands, this respondent reasons.

While some writers express resentment toward any use restrictions, most people do support the idea that the Forest Service should focus management on achievement of a fair balance of uses while minimizing damage to the environment. However, there is clearly little consensus on what level and mix of uses is appropriate. This issue lies at the heart of conflicts over appropriate multiple uses of National Forest System lands: determination of which uses of forest resources "best meet the needs of the American people . . . without impairment of the productivity of the land" (Multiple Use Sustained Yield Act of 1960). Opponents feel that forest management has already moved too far toward environmental protection, and that the Forest Service should return to full multiple use management and increased timber harvest levels. Most proponents of a roadless rule feel that the Forest Service should adhere to the president's mandate by restricting all commercial, non-commercial, and recreational activities that threaten the health and integrity of roadless ecosystems. Limiting prohibitions to road building and reconstruction may hamper some uses, they conclude, but given human ingenuity and rapid technological advances, all detrimental uses should be directly prohibited.

One individual feels that the Forest Service should increase restrictions on companies that extract natural resources from roadless areas to encourage greater efficiency. "I believe there are two options," this writer postulates: "A) we can allow companies to expand into wilderness areas. B) we can protect the resources we have, thereby making companies work smarter . . . . It is my opinion that Option 'B' is in the best interest of everyone, including the companies who want to use our nation's resources. We save our resources and compel companies to become more efficient. In the end, we all win." One individual states that since commodity production does occur on national forests, the best management practices for timber harvest, road construction, and mining should be consistently implemented and evaluated for effectiveness.

Finally, most proponents of a roadless rule assert that the Forest Service should include the Tongass National Forest in logging and road building restrictions to prevent irremediable damage to soils, wildlife, and the tourism and subsistence economies that depend upon them.

Chapter 1 also contains concerns about the purpose and need for the proposed rule, and a diversity of opinions on the proper use of National Forest System lands. Most concerns regarding exemption of the Tongass are found in Chapters 4 and 5.

Public Concern: The Forest Service should clarify whether citizens have the right to treat federal lands as their private property.

You are trying to "lead" the public with false statements. The people own the land not the Forest Service. We have the right to use it, all of it, for our living needs. (Individual, Goleta, CA - #7088.91700)

I cannot, as a citizen of this country, go into any federal office and begin commandeering people's staplers, copy paper, and desk chairs just because "It's my money." Nor can I go onto federal land and clear it for growing flowers for profit. AND even if I could, with the right permit, do these things, I would hope that I and those who issue the permit would keep a close eye on the condition I leave the land in, and whether or not my activities enhance the land for our society in the long run. (Individual, No Address - #1769.90000)

There is a more fundamental issue un-addressed in the DEIS which is at play here. The issue concerns the American public's property rights with respect to Public Lands. First, let me state that public lands is a private property right held collectively by the public. All the public. Not the government, nor the UN via their "Biospheres" or their "World Heritage Sites." (Individual, No Address - #52489.90000)

Ranchers who lock off tracts of land for their private use, bird watchers who think it's their forest only, and other special interest groups have no right to deny the general public use of our public forests. (Individual, Tucson, AZ - #2753.91500)

Public Concern: The Forest Service should focus management on achievement of a fair balance of uses while minimizing damage to the environment.

As a lifelong Oregon resident, I live in the mountains and use the national forests for many recreational activities. From hiking, to fishing, to motorcycle riding. The number one cause of damage to the forests that I see here, is mismanagement of the forest. There are people in every category that abuse it, from off-road vehicles, to hikers cutting trails, and burning, and leaving trash. Adding this much MORE roadless area will not solve the problem. (Business/Business Association, No Address - #8.71220)

The USFS has to demonstrate that they can manage lands in a cost effective manner. Manage them so that wildlife and fish can survive. Manage the national forests so that recreation, beauty, watershed viability, diversity and so on are compatible with resource extraction. Failure to do so will almost surely result in the success of those environmental organizations calling for a complete halt to commercial logging and grazing on federal lands. (Individual, No Address - #5254.83000)

How can we expect emerging nations to protect their land, when we display the exact opposite in behavior? Our natural resources should be managed better than this. (Individual, Venice, CA - #1720.71230)

The highest and best public use of remaining roadless public lands within Lewis and Clark County is to manage for their traditional backcountry uses and values of clean water, fish and wildlife habitats, grazing and outdoor recreation. The proposed policy should encourage local forest officials to do so, in collaboration with county residents, elected officials and area businesses. (County Agency, Helena, MT - #10109.83000)

Public Concern: The Forest Service should restrict all commercial and recreational activities that threaten the health and integrity of the ecosystem.

The public is legitimately concerned about road-building, logging, mining, and other destructive practices in our last undeveloped national forest tracts. (Individual, Charlottesville, VA - #1672.80000)

[One] person commented that "Mining, timber and logging were conducted for generations successfully without significant degradation to the environment." One must wonder what the person was speaking of when he or she said that there has not been significant degradation to the environment. They must be ignoring the fact that countless plant and animal species have become extinct or endangered because of extractive industries that have decimated our forests. They must be turning a blind eye to the siltation of streams from logging, and the pollution of streams from mining operations with heavy metals and toxins too numerous to mention. They must not have heard that 95-97% of our original forests have been destroyed, and that many forests that we have now are monocultures, that do not hold a candle to the biologically diverse places they need replaced. (Environmental/Preservation Organization, No Address - #1826.80000)
The vast majority of the national forests in this country have already been destroyed or severely degraded by roadbuilding, logging, and various forms of motorized transportation and recreation. These forests belong to the

people and should serve the interests of the people, not of the logging industry or other commercial interests. (Individual, Cottage Grove, OR - #1056.80000)

I find it disturbing that we have so exploited our public lands, eliminated some large animals, and in general pushed aside parts of nature we find inconvenient or unprofitable. I oppose the killing of predators: I prefer to compensate ranchers for verified stock losses. Likewise, we have enough tree farm land in the southern U.S. in private hands to supply us with lumber, so I do not like the cutting of slow-growing timber in the west. (Individual, Irving, TX - #3531.81000)

While the draft plan would prohibit road building in roadless areas, it still allows logging in these areas. Timber companies are very adept at logging in roadless areas using helicopters, skid trails and other creative methods. Allowing logging in these areas, even while prohibiting roads, will not provide any real protection for the last of our wild forests. (Individual, No Address - #841.83000)

In so many areas of both the National Forests and BLM lands we say that a very limited water source had been dammed to serve one or a few local farms and therefore changing the whole ecosystem of the area just below the dam. We have seen over the many years of camping [in] the forests that the roads are there only to serve the destructive logging industry, creating lifeless land where there once was an abundance of birds and animals. So many of our forests are now silent. (Individual, Cambria, CA - #3424.81000)

Ranchers have been getting grazing rights in the national forests, on the cheap, for a long time. It is about time they pay attention to the wishes of the majority of Americans who want some wild places and wild life to flourish. (Individual, Strasburg, ND - #1680.80000)

Withdraw all roadless areas from mining. Eliminate all grazing permits in roadless areas to reduce fire hazard. These steps will go far toward protecting watershed values, which will become a crucial issue in the not distant future. (Preservation/Conservation Organization, Sebastopol, CA - #9202.83100)

The purpose of eliminating roads was to minimize the erosion, disruption, watershed damage, weed proliferation and associated bad effects. I don't know what it is like in the forests you frequent, but in the ones I go to the ORVs create their own 'roads' and with them come all the negative effects. (Individual, Spokane, WA - #99224.83000)

Preventing road construction in remaining unroaded areas is wonderful, but this landmark issue is more than just roads. It is about preserving more wild areas from all destructive aspects of the multiple-use doctrine. Logging must not be allowed in these remaining wild areas as well. Neither should mining or damming. (Individual, No Address - #1952.21300)

Public Concern: The Forest Service should increase restrictions on companies that extract natural resources from roadless areas to encourage greater efficiency.

I believe there are two options: A) we can allow companies to expand into wilderness areas. B) we can protect the resources we have, thereby making companies work smarter. If we choose Option "A," we are putting off the inevitable. At some point in time, the wilderness resources will be depleted and businesses will need to rethink their options, or they will go under. If we choose Option "B," the companies and their employees may fuss and fume, but responsive management will immediately look at ways to work more efficiently. It is my opinion that Option "B" is in the best interest of everyone, including the companies who want to use our nation's resources. We save our resources and compel companies to become more efficient. In the end, we all win. Additionally, we need to ask if Option "A" is fair to the public. I think not. A few companies make money, but does our nation as a whole benefit? I don't think so. (Individual, No Address - #13763.83000)

Public Concern: Best management practices for timber harvest, road construction, and mining should be consistently implemented and evaluated for effectiveness.

BMP's for timber, road and mining are designed to allow management while protecting water quality. However, BMP's need to be implemented and evaluated for effectiveness. Increase review of BMP's in planning documents and in the field administration. This is one recommendation I would add to Alternative 1 in roadless areas. (Individual, Willows, CA - #18336.84500)

Public Concern: The Forest Service should include the Tongass National Forest in logging and road building restrictions to prevent irremediable damage to soils, wildlife, and the tourism and subsistence economies which depend upon them.

The town of Tenakee Spring's tourism industry will be harmed by the logging and then by the long term adverse effects of the road construction. We have all seen aerial photographs of tire tracks in the tundra. It is more difficult to see the tracks in the Tongass but they are there across the karst formations. They are there in the encounters between the Tongass brown bears and humans that are increased with more roads. The bears are never the real winners in those confrontations.
If we wait to include the Tongass miles and miles of new roads will be constructed in Tenakee Inlet. Deer populations will lose more and more winter protection from old growth habitat. Brown bear populations will lose the range they need for survival. Fish stocks will be damaged by the lack of repair or closing of roads that cross fish streams. The karst, the underlying geologic formation, that can make the whole ecosystem possible will continue to be damaged with no hope of repair or remediation. (Individual, Tenakee Springs, AK - #8123.83000)

You have ignored critical social and economic assets of non-motorized recreation, tourism, fisheries, subsistence use, wildlife habitat and watershed values in your Preferred Alternatives in the Tongass National Forest. These are the issues Americans want you to address. By law you must address them. Instead you've concentrated your Preferred Alternative on perpetuating one outdated single use for the Tongass public land and it's called welfare logging. Fishermen, subsistence users, recreation and tourism businesses know that they cannot survive another four years of welfare logging roads in our roadless areas. (Individual, Ward Cove, AK - #23836.90010)

There are many non-consumptive uses of the Tongass that do not require roads for access; those activities (visitor industry, eco-tourism, fishing, hiking) should be emphasized. (Individual, No Address - #6324.90000)

KIC Tribal Council would like to see Gravina Island remain a roadless area for the following reasons: Historically, and currently it is still used by Alaska Native people from the Ketchikan area for subsistence fishing, gathering and hunting. The Saxman people use it and they have Rural status. All of the proposed or possible activities would jeopardize the subsistence areas on Gravina, especially Bostwick Inlet. (Tribal Government, Ketchikan, AK - #13987.90400)

I am a subsistence hunter in the Tongass and I feel that the vast number of logging roads has caused a decline in the deer population due to increased human access and hunting pressure. More and more deer poaching takes place as more and more roads are built. Bear populations are suffering wherever new roads are put in. (Individual, Sitka, AK - #19748.90400)

6.2 Travelway Infrastructure Management

Given that the Preferred Alternative prohibits only road construction and reconstruction, a plurality of respondents address the topic of management of the Forest Service travelway system. Access to roadless forest resources, whether commodity or non-commodity, is inextricably linked to the road and trail system for most respondents. Many businesses assert that the ban on road construction will effectively prevent their access to timber and mineral resources in roadless areas. Among those who address recreational access, many people feel that the proposed rule will effectively shut down all access to the national forests. Others challenge this notion, noting that hundreds of thousands of miles of forest roads on the roaded portions of the national forests will not be affected by the rule. Many feel that the existing road system is quite sufficient for access, and that various loopholes and exceptions should be removed in order to provide lasting protection.

Public concerns in this section are subdivided as follows: 6.2.1 General Management Direction, 6.2.2 Road Construction, Reconstruction and Maintenance, 6.2.3 Exceptions to the Road Building Prohibition, 6.2.4 Road Decommissioning and Removal, 6.2.5 Trail System Management, and 6.2.6, Ways.

6.2.1 General Management Direction

The Forest Service should refocus forest travelway system management on the needs of all users rather than just those of the commercial timber industry, say many individuals both in favor of and opposed to the rule. Some feel that the non-timber forest products (NTFP) industry can provide a more sustainable alternative than commercial timber, and that its access needs are different. “NTFP extraction requires various types of access paths ranging from simple trails to industrial roads. In most cases NTFPs do not require the type of heavy equipment road that typifies the majority built on our public forests.” A great number of respondents feel that recreational uses of all kinds are the growth industry of the future, and that the road and trail system should be redesigned to meet the needs of these users. Many agree that the Forest Service should streamline the current road system by maintaining arterial roads while closing smaller peripheral routes and unused logging roads. One state agency agrees that reducing road densities is a laudable goal and should be pursued on a forest-by-forest basis through the forest planning process. A county agency suggests that the Forest Service work collaboratively to develop strategic travel management plans for national forests. An individual professes opposition to and change in status of forest roads from unclassified to classified. One county agency requests that the Forest Service provide management direction for “Public Roads” mentioned in the Roads Management Policy that are controlled by counties.

A great many others, however, feel that the negative effects of roads have been overstated and remain unproven. They request that the Final EIS enumerate and quantify the impacts of road system management on roadless ecosystems, both for the existing road system and for future road construction and reconstruction. One respondent asks the Forest Service to consider the cumulative effects of road construction in Alaska. Another individual maintains

that the final EIS should identify all projects affected by the road building moratorium and that the agency should better elaborate on the need for the proposed rule by quantifying how some threshold has been crossed to make further road building unacceptable. A state agency feels that the DEIS incorrectly presents the need for the rule by basing its effects analysis on impacts of permanent roads. "Most of the roads currently found in Inventoried Roadless Areas (IRA) are temporary and/or closed to public access. The impact of temporary or roads closed to public travel is significantly different than those used to describe and justify the conclusions reached in this document," this agency states.

Public Concern: The Forest Service should refocus forest travelway system management on the needs of all users rather than those of the commercial timber industry.

NON-TIMBER FOREST PRODUCTS INDUSTRY

The concern is that a major stakeholder may be left out [of] the road building deliberations the Forest Service is currently undertaking. The stakeholder(s) in question are entities within the commercial and non-commercial non-timber forest product's (NTFP) sector in this country. NTFPs are forest resources such as mushrooms, truffles, boughs, cones, botanicals for medicine, berries, beargrass, and maple syrup. Including medicinals, the NTFP wholesale sector is a multibillion dollar a year economy. As the Forest Service and other agencies grapple with ecosystem management NTFPs have only been minimally considered, and largely misunderstood. NTFPs, as many countries already have learned, represent an opportunity to manage the forest for increased biodiversity and forest health. NTFPs do not preclude selective timber extraction and are compatible with the emerging knowledge of fire ecology and restoration.
NTFP extraction requires various types of access paths ranging from simple trails to industrial roads. In most cases NTFPs do not require the type of heavy equipment road that typifies the majority built on our public forests. Effective NTFP extraction and ecosystem management needs could likely be carried out on 20% of the existing road infrastructure, but with old roads being modified to a range of levels from those for small vehicles, to ATVs to horses, to bicycles, and to foot trails. New access ways could be built into existing roadless areas that would allow for NTFP extraction, but without damaging the ecosystem. Existing Federal road subsidies could be reduced and made available for the construction, alteration, and maintenance of simple, low impact roads and trails.
With greater emphasis on NTFPs the forests will become healthier and visually more appealing because of their diversity. Management for NTFPs will result in economic diversity and yields that will far exceed anything seen under the timber management approach.
Recommendation: Alter the President's proposed ban on new road building to allow for maintenance and construction of simple, low impact roads and trails that are compatible with the needs of non-timber forest product commercial and non-commercial harvesting. (Individual, Portland, OR - #5735.93400)

RECREATIONAL USERS

I do endorse a policy of thoughtfully designed construction….In the future build roads with consideration to impacts on both nature and the users. Do not build too many roads in or into an area. Build the road to make the beauty viewable or accessible with a relatively short hike, not a weeklong trek. Currently roads seem to me to be built only with considerations for most economic forest harvesting. I agree that this should be changed. (Individual, No Address - #2318.71300)

If any roads are to be built, they should be small recreational roads only. There are multiple advantages of the Roadless Areas Initiative, one of which is to preserve the public recreational aspects of the national forests. Thus, it would seem permissible to permit small scenic roads into a forest for the purposes of scenic recreation, non-intrusive travel and scientific study. This does have an advantage of permitting some access for those who

might not have the physical ability or the available time to visit such areas. (Business, Birmingham, AL - #26844.60000)

We require that the taxpayers have expanded access to the forest lands, with new roads for our SUV and camping public. (Individual, Goleta, CA - #7088.91700)

Our families work and live in the Bitterroot largely because of a road system's access for weekend recreational activities throughout the year. The opportunity to wisely expand that system would further expand the chance for a quality recreational visit throughout the forest. (Business/Business Association, Hamilton, MT - #7251.10212)

A major generally unspoken, objective of the no-road champions is to prevent logging. It's overlooked that not all national forest roads are built, nor should they be built, solely for access to areas prescribed for timber management. As roads provide access to and through national parks, wildlife refuges, and other preserves for the purpose of affording the public the means and opportunity to experience and learn about those areas, so should they in select situations serve the same purpose on national forests. A well designed road can be a beautiful feature of an otherwise wildland area. (Individual, Juneau, AK - #8099.93300)

Public Concern: The Forest Service should streamline the road system by maintaining arterial roads while closing smaller peripheral routes and logging roads.

Look at present usage of wilderness country. Some, the more inaccessible parts, are virtually unused. The more accessible parts along the edges get hammered. Close all roads in national forests and the same thing will occur; all use will be at the edges with high impact. Americans need recreation room. Keep open and maintain arterial roads throughout the national forests. Close smaller feeder routes and skid trails. This gives wildlife privacy and escape from humans. Open arterial roads gives humans access to the whole of the forest rather than just the edges, and room away from each other, and spreads the impact of usage to acceptable levels. (Individual, Millville, CA - #19985.91500)

I and many others suggest NO NEW ROAD CONSTRUCTION and abandonment of ALL PERIPHERAL ROADS. (Individual, Tunbridge, VT - #944.63000)

Public Concern: The Forest Service should reduce road densities on a forest-by-forest basis through the forest planning process.

The Council believes reducing the number and density of roads open to public vehicular travel is a positive goal and should be pursued on a forest-by-forest basis during the planning process. (State Agency, Wisconsin Rapids, WI - #13980.71300)

COLLABORATIVELY DEVELOP STRATEGIC TRAVEL MANAGEMENT PLANS

Recommend that this roadless characteristics conservation planning process be carried out in a collaborative manner that includes: includes a final travel management plan that identifies the optimization strategy for the road network and lists the priority order in which roads will be closed and decommissioned. (County Elected Official, Eagle, CO - #15908.71300)

Public Concern: The Forest Service should not classify currently unclassified roads.

I am AGAINST classifying roads. Leave roads unclassified. (Individual, Tucson, AZ - #13839.71300)

Public Concern: The Forest Service should provide management direction for "Public Roads."

We note that the proposed road rules included a reference to "Public Roads" which are in addition to the "classified" and "unclassified roads." We suggest to avoid confusion and to be consistent with the companion rulemaking that the Proposed Rules also incorporate management direction for these "Public Roads" which are under the jurisdiction of the local governments. (County Agency, John Day, OR - #16087.32100)

Public Concern: The Forest Service should enumerate and quantify the foreseeable impacts of road system management on roadless ecosystems.

EXISTING ROAD SYSTEM

No data is presented to support the assertion that the existing road system is having a significant negative affect on the environment or to quantify that impact. (Individual, Salt Lake City, UT - 13258.82000)

The impact of primitive, dirt roads on an undeveloped area is hugely overstated. Viewed from above, a dirt road takes up almost no area, however, the viewers tend to be on that road, therefore get a distorted view. Often the road is not even perceptible 20 yards into the woods. Erosion can be an issue, but once again, it must be quantified on the basis of the entire area, not by someone walking down the road, with that as their only view. (Individual, No Address - #7649.83200)

Roads are not necessarily hard on watersheds. Properly designed, roads put almost no increase in sedimentation or risk on watersheds. Properly designed, roads need almost no maintenance. (Individual, No Address - #848.83100)

Every proposed roadless characteristic says roadless areas are more likely to have or not have something, but there is no substantiating documentation that specifically identifies a road as the reason for this to be more likely to occur or not occur. Item (4) there is no documentation that areas without a road function better "as biological strongholds and refuges for many species." A road has not been documented to reduce the ability to "maintain native species viability and biodiversity." If you are in fact referring to uses of the land or road you need to define what uses and specifically what effects they have. If your rule is referring to uses and not roads, the proper term for this rule is use not roads and the real word useless not the derived word roadless. It should be renamed "Useless conservation initiative" to properly identify what your effects analysis is referring to. (Timber Association, No Address - #52501.71300)

ROAD CONSTRUCTION AND RECONSTRUCTION, GENERAL

At a very minimum, the effects analysis should include variables, such as average expected stream crossings and culverts required per mile of road constructed or reconstructed. This would at least provide the reader a sense of how the alternatives differ and their potential adverse impacts. On a national average, how many miles of road are required per million board feet of timber harvested? How is the reader expected to evaluate the discussion and comment when this information is not disclosed?
Relief: The Forest Service must provide a quantitative evaluation of the effects and consider applying the data on "miles of road/million board feet" of timber harvested. (County Elected Officials, Worland, WY - #16185.93300)

I believe that many of your concerns regarding environmental damage resulting from road construction are overstated. Current road engineering and construction techniques can greatly reduce these fears if roads are properly designed in the first place. (Town or Municipality Elected Official, Deer River, MN - #11235.71300)

CUMULATIVE EFFECTS OF ROAD CONSTRUCTION IN ALASKA

Even if the allowable buffer for road development in the Chugach was expanded to five miles to allow for future dispersed recreation opportunities, the forest would still be approximately 80% in the unroaded category. Furthermore, additional road development is not likely to occur at a significant pace given the lack of marketable timber and natural topography constraints. In fact, in my 20 years on the Glacier Ranger District, I can only remember one new road for a total new construction of just over 1 mile in 20 years. The DEIS fails to track the cumulative effects of development of roads on the Chugach in the "past, present, and foreseeable future" as required by NEPA for an appropriate analysis. Therefore the Forest Service does not know or identify the rate of change of terrain on the Chugach National Forest from non-roaded to roaded status. My guess is that this rate of change is extremely low and does not present a current threat to even an additional 1% of the Chugach National Forest. (Business, Girdwood, AK - #52944.70000)

Public Concern: The final EIS should identify all projects affected by the road building moratorium and better elaborate on the need for the proposed rule.

Very few new roads were proposed in the Roadless areas, or the so-called Unclassified Road areas. How many new roads and road reconstruction projects were actually proposed and impacted by the roadless moratorium and where are these roads actually located and will you clearly and fully disclose this valid information to the public in the final? Were the potential environmental impacts considered as part of the individual analysis for these new proposed roads and roads that were to be reconstructed? If so, were there specific mitigations included as part of these specific road projects and what were these site specific mitigations, (also will you meet the need to disclose this information in the final to the public, as it does [have] a real bearing on determining the cumulative impacts and the true need for the proposed alternatives)? Was the specific potential use of these specific proposed road projects the concern, or the existence of the potential roads the concern and are these concerns clearly quantified and distinguished in the earlier analysis and will this pertinent analysis be fully disclosed in the final? Did these road projects trigger exceeding some established level of tolerance of impact and/or a quantifiable threshold of concern and/or established contextual level of significance and will this…valid information be fully disclosed in the final if it is has been so established. (Individual, Sacramento, CA - #16567.71300)

Public Concern: The Forest Service should base its effects analysis on the impacts of temporary rather than permanent roads.

The draft Environmental Impact Statement (EIS) has a critical flaw in the way it utilizes numerous studies involving the impact of roads on the various resources. In most cases the roads identified in the studies as having significant impacts are unrestricted access permanent year round graveled or paved roads. Most of the roads currently found in Inventoried Roadless Areas (IRA) are temporary and/or closed to public access. The impact of temporary or roads closed to public travel is significantly different than those used to describe and justify the conclusions reached in this document. (State Agency, Wisconsin Rapids, WI - #13980.82000)

6.2.2 Road Construction, Reconstruction, and Maintenance

Many respondents urge the Forest Service to implement the proposed prohibition on road construction and reconstruction. "With over 300,000 miles of roads for loggers, recreational vehicles and hunters how about keeping the rest of the wild areas wild? Just because we CAN build roads everywhere doesn't mean we should," ventures one respondent. Many proponents assert that the Forest Service should prohibit road construction and reconstruction in all portions of roadless areas, including the "roaded" sections (see also Chapter 4). Many

reasons are given in support of a prohibition on road building, including prevention of adverse impacts to the ecosystem caused by greater public access. Some worry about increased poaching of plants and wildlife, while others challenge this claim. Some people request that the Forest Service consider re-opening closed roads as an alternative to building new ones. One writer recommends that the final rule should assure no net gain of road miles by requiring removal of equal road mileage for every special exemption. One concerned citizen requests that the Forest Service halt reconstruction on the Loop Road in Fremont County, Wyoming in response to this rulemaking.

The final rule should allow stabilization but not full reconstruction of badly deteriorated roads, proposes an environmental organization. Some respondents would like the final rule to prohibit temporary roads from being built. Others disagree, requesting that the Forest Service allow temporary roads as long as they are built to minimum standards, promptly removed and revegetated, and paid for entirely by the timber purchaser. Others feel that temporary roads should be permitted for salvage harvest. Some ask the Forest Service to reassess the assumption in the Draft EIS that logging roads built into roadless areas would remain open to the public. Instead, some assert, roads built for logging and maintenance should be made off limits to the general public by means of barriers and gates. For any road building that does occur, individuals request more stringent road building standards be implemented, especially to protect salmon fisheries and the fishing industry. Another person suggests that funding should be linked in any timber sale plan to assure stricter road building standards are followed. Many feel that current road building standards are quite adequate to protect ecosystems, and that the Forest Service should explain to the public how these best management practices minimize environmental impacts. One individual recommends that the Forest Service switch to the use of plastic culverts for road projects where feasible to reduce long term maintenance needs and costs.

Some respondents ask the Forest Service to clarify whether the final rule will prohibit road maintenance in inventoried roadless areas, as opposed to reconstruction. Furthermore, a few individuals request that the Forest Service revise guidelines for road maintenance and reconstruction to ensure that existing roads are preserved in useful condition. The Forest Service should delete the reference to road maintenance on page 1-4 of the Draft EIS or address maintenance as part of an alternative, recommends a county elected official. Others suggest that it would be more appropriate for the Forest Service to address road construction and road reconstruction separately in the final rule.

Many people question what distance of buffer will be established between a classified road and a designated roadless area in the final rule. The Forest Service should reconsider the buffer width between existing roads and roadless areas, they feel. Some suggest alternative buffer widths, such as one-half or one-quarter mile. Others request that rather than an arbitrary buffer width, buffers should be clearly defined and ecologically justified by the Forest Service. “The final rule should give guidelines regarding road buffers. Because road buffers define the boundary of a ‘roadless area,’ they often exclude areas of land that are truly roadless,” asserts one respondent. The issue of setback zones from roads is of particular concern to many state and county departments of transportation because they own and are responsible for many roads that traverse National Forest System lands. Therefore, some

request that the Forest Service clarify whether there will be a setback between roadless areas and adjacent state highways that would allow for road reconstruction. Others conclude that the final rule should expressly permit road construction, realignment and reconstruction of federal and state highway systems. Finally, the final rule should be consistent with commitments made in the Environmental Streamlining National Memorandum of Understanding regarding expedited highway and transit projects, advises one state agency.

Public Concern: The Forest Service should implement the proposed prohibition on road construction and reconstruction.

I urge you to implement the proposed Roadless Area Conservation measure. I believe new road construction in roadless national forest areas should be prohibited, as should upgrades of existing roads in national forests to greater carrying capacity. (Individual, Santa Barbara, CA - #664.61200)

Roads have no analogy in Nature, and so should be built only as a last resort, and with great caution. (Individual, Moscow, ID - #7505.71300)

With over 300,000 miles of roads for loggers, recreational vehicles and hunters how about keeping the rest of the wild areas wild? Just because we CAN build roads everywhere doesn't mean we should. Knowing there are places that don't have the noise pollution caused by human machines assaulting us at every turn is most comforting. (Individual, Moscow, ID - #13495.10100)

I think taxpayers' money could be better spent maintaining the roads we have and not cutting new ones. (Individual, Portland, OR - #1087.93610)

As a taxpayer I am against the current use of vast taxpayer monies that are devoted to creation and maintenance of the existing road system in our national forests. It would be much better to devote taxpayer dollars to proper maintenance of our existing road systems so they can function properly for ecological and economic benefit. (Individual, Houghton, MI - #1342.93610)

The hundreds of thousands of miles of roads on our National Forests are certainly sufficient to provide access, recreation opportunities, and extractive resources. NEW ROADS MUST BE PROHIBITED IMMEDIATELY ON ALL NATIONAL FORESTS. (University/Professional Society, Gunnison, CO - #9680.71300)

Public Concern: The Forest Service should prohibit road construction and reconstruction in all portions of inventoried roadless areas, including the "roaded" portions.

I support prohibition of any road construction and reconstruction including temporary road construction in all portions of inventoried roadless areas, including the "roaded" sections. The "roads" in inventoried roadless areas are often trails or social routes, developed by both motorized and non-motorized recreational users who do not understand the damage roads can do to a native ecosystem. (Individual, Boulder, CO - #6755.71300)

Appendix B does not quantify what portion of the designated roadless areas qualify for protection under the proposed rule since there is nothing to indicate if these areas are unroaded. Only these areas that are unroaded inventoried roadless areas will be protected as presented in the DEIS. . . . . Conceivably, there may be no lands in Minnesota, Michigan, Wisconsin, and Mississippi that satisfy the criteria since combined, the states have 106,000 acres of inventoried roadless area subject to roadbuilding. "Roadbuilding is allowed in the remaining 33.8 million acres of inventoried roadless areas subject to this rule. Within the total 54.3 million acres of inventoried roadless areas, an estimated 2.8 million acres have been roaded since they were inventoried (DEIS

p. S-34). Of all the lands [managed] by the Forest Service, these lands most need protection. (Environmental/Preservation Organization, Plymouth, MN - #51067.64424)

We advocate including all portions of inventoried roadless areas that still meet the criteria for roadless areas. East of the 100th meridian, roadless areas may contain up to ½ a mile of improved roads per 1000 acres and still qualify for the roadless inventory. If a road has been constructed in one of these roadless areas after the inventory was conducted but does not exceed the allowable road density, the area should not be removed from the inventoried area. Perimeter roads should not be included in determining areas to be excluded from inventoried roadless areas. (Environmental/Preservation Organization, Johnson City, TN - #52195.64424)

Public Concern: The Forest Service should end road building to prevent adverse impacts to the ecosystem caused by greater public access.

Experience has demonstrated that when an access road is built, the surrounding forest is soon degraded. The degradation caused by logging is bad enough, but the added impact of unregulated human activity soon follows. Any visitor to the back forest roads is not only greeted by the sight of acres and acres of stumps, but also has to endure the eyesore of illicit garbage dumps, shooting pits, off-road vehicle tracks, and other acts of rudeness, vandalism, and criminality. (Individual, Troutpale, OR - #225.83000)

Roads mean increased access to sensitive wildlife habitat for poachers, and for vandals of archeological sites…More people in an area means more trash and more pollution. (Environmental/Preservation Organization, No Address - #1826.83000)

Enough is enough! Continued road building only means continued degradation of habitat through siltation of streams from runoff and fragmentation of critical areas to wildlife. More roads mean easy access by vehicles and people of all kinds, and a greater potential for exploitation of wildlife populations and the environment. (Individual, Craig, AK - #6415.83000)

INCREASED POACHING OF PLANTS AND WILDLIFE

What difference could roads possibly make in a wilderness, national forest, world heritage site, in any natural area? Aren't roads good? Roads are not 100% a bad thing, even the most hard-headed enviro must admit that. But roads open up natural areas to a whole herd of problems. They allow easy access for poachers of wild plants (American plants faced with extinction due to American poachers include American ginseng, Echinacea, Goldenseal, among a host of others) as well as poachers of wild animals. (Individual, Brooklyn, NY - #4557.80000)

I have witnessed mass destruction of the national forest on the Olympic Peninsula, as a result of clear cut logging operations, and massive poaching of Roosevelt Elk, as a result of logging roads running throughout the elk's habitat range, allowing unfettered access to them by poachers. (Individual, Airway Heights, WA - #8895.83530)

Roads fragment wildlife habitat, block or inhibit movement of small animals (even some large animals) and invertebrates and expose large animals to heavy hunting pressures, poaching, harassment and/or displacement as well as potential habituation (e.g., bears using roadside riparian habitat). (Individual, Cody, WY - #9386.83421)

Public Concern: The Forest Service should demonstrate the connection between poaching and road access.

Just because the Wilderness Society alleges such a thing in its mailings regarding the Targhee NF doesn't make poaching a widespread threat. The Forest Service must fully study poaching rates and present tangible evidence

that poaching and roads are in fact interrelated sufficiently to impact game populations. (Individual, Whitefish, MT - #30417)

Public Concern: The Forest Service should open existing roads rather build new roads.

We have a cabin in the Swan Valley of Montana and enjoy hiking into the primitive roadless areas which are accessible to everyone. However as we go through the woods we see hundreds of roads that are blocked off by gates by private landowners (timber industry). Why can't existing roads such as these be opened to public use. Why do we need more roads when we are not using the ones we already have? (Individual, No Address - #6950.71300)

Public Concern: The final rule should assure no net gain of road miles by requiring removal of equal road mileage for every special exemption.

Some strategy should be developed for eliminating roads in areas which now have roads, to allow these areas to recover ecologically and to compensate for roads already built in Roadless areas and those which will be built under the special exemptions. If the goal is to maintain and enhance existing national forests there should be a concerted effort to assure a balanced relationship between roaded and roadless areas--not a constant elimination of roadless areas through special exemptions. What is lost to the roadless area should be restored from the roaded area in a way similar to the program for replacing wetlands. (Individual, Killington, VT - #27779.71300)

Public Concern: The Forest Service should halt reconstruction on the Loop Road in Fremont County, Wyoming.

[T]here is a Forest Service "road reconstruction project," known as the Loop Road in Fremont County, Wyoming, just outside the town of Lander. As a resident of this County as well as Salt Lake County, I would ask that the Loop road reconstruction be halted as part of the entire program of fewer roads. There are literally reams of citizen comment AGAINST the reconstructing on file in Denver. Now is clearly the time to pull out of this unwanted and controversial project in a graceful manner. (Individual, Salt Lake City, UT - #1101.71300)

Public Concern: The final rule should allow stabilization but not full reconstruction of badly deteriorated roads.

The definition of "road reconstruction" must be clarified to address the situation where a road has naturally deteriorated or revegetated to a point where major capital expenditure is needed just to bring the road back to its original capacity and design function. Such roads should not be allowed to be maintained or reconstructed except to stabilize them geomorphically and hydrologically so as to prevent adverse resource impacts. (Environmental/Preservation Organization, Eugene, OR - #55101.32000)

Public Concern: The Forest Service should not allow temporary roads to be built.

I urge you to create a sustainable plan that includes no new roads, even "temporary" ones. (Individual, No Address - #456.10110)

Public Concern: The Forest Service should allow temporary roads for timber harvest as long as they are promptly closed.

There is room for logging in the roadless areas as long as permanent roads are not constructed (management techniques are used to close off temporary roads immediately after their use for logging) and old growth forests or sensitive areas are not logged. (Individual, Smithville, NJ - #6471.61300)

Public Concern: Roads associated with timber harvest projects should be built to minimum standards, restored to natural conditions upon completion of the project, and paid for by the timber purchaser.

Timber is a renewable resource. Roads associated with timber harvest and fuel reduction projects should be constructed to minimum standards which provide for safe operations and environmental protection and should be paid for by the timber purchaser. Roads so constructed and not needed for future forest management should be "put to bed" at the close of activity. Timber purchasers should be required to chip or remove slash or deal with it in some other environmentally acceptable manner which will not increase fire hazard. Harvest selection should be targeted toward timber stand improvement and sustainable forestry. (Individual, Markleville, CA - #13284.71300)

Regarding the roadless area proposal, I believe that timber production should be permitted on a MANAGED basis. If roads need to be constructed to permit periodic harvest of timber--allow it, provided roadbeds are removed after harvest. (Individual, Bloomington, MN - #1876.63000)

Public Concern: The Forest Service should allow temporary roads for salvage harvest.

Temporary roads might be needed to access burned or bug killed stands. (Individual, Orofino, ID - #8512.71300)

Public Concern: The Forest Service should reassess the assumption in the Draft EIS that logging roads built into a roadless areas would remain open to the public.

The argument that "the F.S. can not maintain the roads it has, so why build new ones?" makes a great sound bite. But your figures of 1,444 miles of roads proposed within the next 5 years in roadless areas compared with the 386,000 miles of existing F.S. roads only constitutes 0.3 percent of the total road mileage. Your rates of decommissioning are about 2,000 miles per year, which far exceeds the proposed road construction in roadless areas. In addition timber purchasers are usually required to do deferred maintenance costs. The DEIS seems to assume that any road built into a roadless area will remain open to the public with the resulting impacts displayed in your analysis. The reality is that many of the proposed roads are single purpose roads which will be closed or decommissioned after use, thus minimizing the impacts that are displayed throughout the DEIS. (Individual, McCall, ID - #7575.93610)

In chapter 3, page 11, the Forest Service needs to define "irreversible loss of roadless character." It is unclear why temporary roads would have this effect. This problem (misunderstanding or mischaracterization of the effects of temporary roads) occurs elsewhere in the DEIS. At a minimum the DEIS needs to discuss what a temporary road is, and how the term "temporary" means it is planned for closure/obliteration after project activities are completed. (Timber Association, No Address - #52501.71300)

Public Concern: Roads built for logging and maintenance should be made off limits to the general public by means of barriers and gates.

As for roads used for logging in our national forests, we trust the professional men and women of the US. Forest Service to make wise decisions about limited harvesting of trees for purposes of fire protection only. We are not, therefore, against the judicious use of a few judiciously placed roads for the purpose of limited logging and maintenance. But PLEASE MAKE THESE ROADS OFF-LIMITS TO THE GENERAL PUBLIC by means of barriers and gates. (Individual, Tempe, AZ - #941.21500)

Public Concern: Stringent road building standards need to be implemented to protect salmon fisheries and the fishing industry.

Salmon fishing is a valuable forest-dependent industry in Alaska and in some coastal communities has historically been the only industry. Sediment washed down from poorly managed forests can destroy estuaries, drown out crab and shrimp nurseries, lead to or exacerbate flooding or coastal areas, and kill salmon production entirely. Poor forestry practices in the past have stripped protective vegetation from salmon producing streams, elevated water temperatures to the point where salmon die, and channelized river systems so badly that they may take generations to naturally recover. In many cases, the health of forested watersheds determines the health of our near shore fisheries and the economic future of our communities. For this reason stringent road building standards need to be in place to maintain high quality fish and wildlife habitat. (Individual, Pelican, AK - #7179.83510)

Public Concern: Funding should be linked in any timber sale plan to safeguard stricter road building standards.

Funding [should be] linked in any timber sale plan to safeguard stricter logging standards set for road building. (Individual, Pelican, AK - #7179.83510)

Public Concern: The Forest Service should explain how best management practices for road construction minimize environmental impacts.

Pg. 3-15 last paragraph and again on pg 3-23 indicate that best management practices for road planning, design and construction can minimize adverse environmental impacts. Please define and quantify remaining impacts. Are these best management practices assumed in the baseline and the no-action alternative? If so, the roadless initiative would appear to provide only a slight marginal improvement (perhaps insignificant) in the ecological health of the same areas affected by this proposal. Following the same logic, decommissioning efforts have a far greater impact on Forest Health than this proposal. (County Elected Official, Battle Mountain, NV - #43985.33300)

Public Concern: The Forest Service should consider the use of plastic culverts for road projects.

Pertaining to road maintenance & building perhaps plastic culverts should be used whenever the design would permit. This would extend the life expectancy of the culvert & save money in the long term. (Individual, Ewen, MI - #10576.71300)

Public Concern: The Forest Service should clarify whether the final rule will prohibit road maintenance in inventoried roadless areas.

I cannot tell specifically if the roadless proposal also will prohibit road maintenance in "inventoried roadless areas," whether heavy maintenance or light. (Individual, Clayton, GA - #2802.33200)

Public Concern: The Forest Service should revise guidelines for maintenance and reconstruction to ensure that existing roads are preserved in useful condition.

Although the proposal states that it does not call for closing any existing roads the provisions for road maintenance and re-construction amount to a slow closure of many roads located in or near roadless areas. Guidelines for maintenance and reconstruction need to be revised so as to ensure that existing roads are preserved in useful condition. (Business/Business Association, Lewiston, ID - #14715.90000)

Public Concern: The Forest Service should delete the reference to road maintenance on page 1-4 of the Draft EIS or address maintenance as part of an alternative.

Comment: Page 1-4, 4th paragraph--This reference to road maintenance is not germane to the discussion regarding the purpose for preserving roadless areas. This is a separate and distinct issue that could be managed if the Forest Service would prioritize funding and use of its resources (meaning people and funds). Although it is brought up many times as an issue, it is not addressed in any alternative.
Relief: The Forest Service needs to address this issue by deleting the reference to road maintenance or address it as part of an alternative. (County Elected Official, Worland, WY - #16185.93610)

Public Concern: The Forest Service should consider road construction and road reconstruction separately.

Prohibiting new road construction is one thing, prohibiting road reconstruction is another. You have lumped two ideas together which should be considered as individual proposals. (Individual, No Address - #2271.61300)

Public Concern: The Forest Service should reconsider the buffer width between existing roads and roadless areas.

One way to address this demand and still protect the roadless characteristics of these areas is to widen the buffer area of existing roads. While we could not find a specific reference to the buffer size, we feel that a minimum of one half mile on each side of the road would allow the local Forest Manager the latitude to plan for recreation and other uses which are road dependent. (County Elected Official, Winnemucca, NV - #13558.63000)

There should be clarification of what area is included around any road that has been constructed. The criteria for determining the excluded area should be consistent among forests. We suggest a distance of ¼ mile either side of a classified road. (Environmental/Preservation Organization, Johnson City, TN - #52195.71300)

Public Concern: Road buffers should be clearly defined and ecologically justified by the Forest Service.

The purpose of a road buffer must be clearly defined and ecologically justified. Varying distances of road buffers (from zero feet to 0.5 mile[s]) have been drawn around roads by the Forest Service, defining the roadless area boundary some distance away from the road. There does not appear to be a consistent distance or justification for these buffers from forest to forest. The final rule should give guidelines regarding road buffers. Because road buffers define the boundary of a "roadless area," they often exclude areas of land that are truly roadless. The 0.5 mile buffer is a subjective length, and excludes the outermost portion of the roadless areas. The Coronado National Forest Plan states that you are not allowed to drive off a road more than 100 yards, yet the road buffer is 0.5 miles out from the road. This sends a mixed message to off-road vehicle users, and leaves significant tracts of roadless area unprotected from off-road vehicle use and other environmentally damaging activities. (Environmental/Preservation Organization, Albuquerque, NM - #43737.91600)

Public Concern: The Forest Service should clarify whether there will be a setback between roadless areas and adjacent state highways that would allow for road reconstruction.

Some of the roadless areas abut state highways. The highways may need to be widened or realigned. Will this be allowed? Do the roadless areas have a specific setback from the edge of a highway or do they extend to the edge of the pavement? (Individual, No Address - #397.71120)

Public Concern: The final rule should permit road construction, realignment, and reconstruction of federal and state highway systems.

UDOT requests that for all alternatives studied in the DEIS, existing corridors that serve U.S. and State Routes in Utah be designated as areas that allow road construction or reconstruction. (State Agency, Salt Lake City, UT - #13556.64350)

We believe the construction and maintenance of public highways should be exempt from this proposed regulation. The Virginia Department of Transportation (VDOT) is responsible for maintaining a statewide transportation system, and this rulemaking would seriously jeopardize our responsibility. Furthermore, the NOI maintains that "road construction increases the risk of erosion, landslides, and slope failure, endangering the health of entire watersheds that provide drinking water to millions of Americans and critical habitat for fish and wildlife." The construction of all state-maintained roads in Virginia adheres to erosion and sediment specifications approved by the Virginia Department of Conservation and Recreation. In addition, all VDOT roads are constructed in accordance with all environmental laws and regulations including he Clean Water Act and Endangered Species Act. Therefore, the above environmental concerns are already addressed on VDOT projects. (State Agency, Richmond, VA - #87.64350)

Please be advised that Riverside County [CA] is currently involved in a comprehensive planning program known as the Riverside County Integrated Project (RCIP). This project combines the elements of land use planning with multi-species habitat conservation and transportation planning and project development of Riverside County through the year 2020, including a new County General Plan, adoption and Tier 1 environmental clearance for new transportation corridors, and adoption of a Multi-Species Habitat Conservation Plan. One of the primary transportation corridors under consideration for the transportation component of the RCIP is a new Riverside County to Orange County connection. Any such connection would affect the Cleveland National Forest, as the Forest is located along the entire length of the border between these counties. At present, the only significant transportation corridor linking these two counties is State Route 91, located near the northerly edge of the Cleveland National Forest. While we are yet in the process of identifying alignment alternatives, preliminary discussions with local Forest Service staff suggests that a realignment of existing State Route 74, potentially with some tunneling, might prove to be more acceptable than other alternatives. No

decision has been reached with respect to this corridor proposal. Any number of alternative alignments covering the entire boundary between the two counties are still under consideration. Additionally, we recognize the need to coordinate our planning efforts with the upcoming update of the Forest Management Plan. However, we would like to confirm that realignment of State Route 74, perhaps a significant realignment, as well as other reasonable and prudent alternative alignments would still be considered by the Forest Service in light of the Proposed Roadless Rule. It appears that the entire area northerly of existing State Route 74 is being proposed as a roadless area. Any number of alternative alignments would potentially affect portions of this area. As the planning and consensus building for this corridor continues, we fully intend to involve the Forest Service in the process. (County Agency, Riverside, CA - #13964.71110)

Another area of concern is Bautista Canyon Road in the San Bernardino National Forest. The County Transportation Department, in conjunction with the Forest Service is undertaking a project to pave and realign, consistent with traffic safety needs, the segment of this road within the National Forest that is currently a County Maintained dirt road. The environmental phase of this project is just getting underway, but it already appears likely that some realignment of the existing road will be needed in order to comply with design safety standards. Again our concern would be that Proposed Roadless Rule not preclude such realignment. (County Agency, Riverside, CA - #13964.71110)

There are many places where new roads need to be constructed to improve our national infrastructure and which could reduce the mileage between major population centers. Such improvement would reduce fuel consumed and thus enhance the environment with less greenhouse gasses, etc. (Individual, Fountain Hills, AZ - #950.81000)

Another area of concern is noted on page 3-172 in Volume 1 of the DEIS. It is located in the first sentence of the third paragraph. It states, "THE ROAD PROHIBITION WILL LIMIT ROADED RECREATION ACCESS TO INVENTORIED ROADLESS AREAS, WHICH MAY CAUSE INCREASED CONGESTION IN EXISTING ROADED AREAS OF THE FOREST." It is a known fact that congestion leads to the cause of multiple car accidents. And in areas of extreme terrain, congestion becomes more of a problem due to the increased distribution of operating speeds of vehicles. Loaded 18 wheel trucks and motor homes have trouble negotiating the steep grades in areas of extreme terrain. This leads to congestion because, cars will become trapped behind these slower types of vehicles. Drivers of the faster cars will become frustrated and will attempt to pass the slower vehicles in limited areas of safe sight distances. Poor decisions will lead to head on collisions with vehicles in the opposing lanes. These types of collisions will normally result in fatalities. It is necessary that WYDOT is able to execute their mission without any further restrictions in these areas. WYDOT will need the latitude to expand the present roadways where needed. Expansion will be needed to reduce congestion. An example of expansion may include the addition of truck climbing lanes in areas of steep grades. Passing lanes is another example that may be implemented in areas of restricted sight distance. (State Agency, Cheyenne, WY - #15885.72400)

WYDOT [Wyoming Department of Transportation] is thankful for the opportunity to provide comments on this new national plan for the management of roads on Forest Service land. After review of the maps on pages 214 through 221 in Volume 2 of the DEIS, it became extremely evident that several US Highways and State Highways intersect the areas designated that will not permit road construction or reconstruction. A very rough summary was prepared to understand the potential effect on these highways. This summary is attached to this letter. This summary reflects the potential of 260 miles of roadway that is presently being managed by WYDOT [that] could be affected from this proposal.
WYDOT attended the public meeting. Representatives from the Planning Branch of the Forest Service reassured DOT officials that this proposal would not interfere with WYDOT's management of these roadways. However, this was never clarified in the DEIS and as such potential impacts to the State's Highways are unknown. (State Agency, Cheyenne, WY - #15885.40200)

Public Concern: The final rule should be consistent with commitments made in the Environmental Streamlining National Memorandum of Understanding regarding expedited highway and transit projects.

We are confused about the timing of this proposed rulemaking. An Environmental Streamlining National Memorandum of Understanding was signed in July 1999 by several federal agencies, including the U.S. Department of Agriculture. The MOU required that agencies streamline processes to expedite the construction of highway and transit projects. The proposed rulemaking appears to contradict the streamlining effort. (State Agency, Richmond, VA - #87.40000)

6.2.3 Exceptions to the Road Building Prohibition

Numerous respondents request that the Forest Service reconsider the exceptions to the proposed rule that would permit road building and reconstruction under specific circumstances. Critics of the rule who favor stronger roadless protections assert that the proposed rule contains too many exceptions and loopholes, thus rendering it ineffective.

They suggest that the Forest Service substantially narrow any exceptions for road construction in the final rule. Some recommend that the Forest Service narrow the exception language for catastrophic fire. Indeed, several respondents believe private property owners should be required to take measures to fireproof their own property. Others feel that the final rule should narrow the exemption language to protection of life and property to prevent "significant loss of constructed property, such as buildings and bridges."

The exemption for public safety is a topic of concern to many respondents. Several environmental organizations suggest that rather than removing hazard trees, the Forest Service should establish guidelines for alternative hazard management strategies. Others suggest that the exemption for public safety be relaxed. (Many opponents, especially businesses, utilities, and state and local governments, request that exceptions be broadened to specifically allow road access to mineral resources and utility infrastructure, and ski area development. Others oppose these exceptions. These concerns are covered in Sections 6.3.7, 6.3.9, and 6.3.10).

"The Forest Service should insert 'A road is needed to carry out the multiple uses provided for in the authorities cited for these regulations' following Section 294.12(b)(4) of the Draft EIS," states a mining association. Some researchers request that the Forest Service should consider broadening exceptions in the final rule to include special use permits for scientific research projects. Finally, some call for a provision in the final rule that all requests for exceptions be subjected to the proper NEPA (National Environmental Policy Act) analysis process and independent scientific review.

Public Concern: The Forest Service should limit exceptions for road construction in the proposed rule.

We therefore ask the Forest Service to modify the language of the exceptions to the road construction/reconstruction prohibition to ensure the exceptions are not abused. Specifically, we ask the agency

to add language that allows road construction or reconstruction in roadless areas only when (1) it is demonstrated that such road construction or reconstruction is necessary to achieve the intended purpose, and (2) it is shown that all other means of access--not requiring road construction or reconstruction--are impracticable. (Environmental/Preservation Organization, Laramie, WY - #43697.31000)

On page S-1 (and wherever else it is found in these documents), the phrase, "unless they (roads) are needed for public health and safety, for reserved or outstanding rights, or for other specified reasons." This discretion is way too broad and subject to arbitrary discretion. (Environmental/Preservation Organization, Bellaire, TX - #13951.31100)

Public Concern: The Forest Service should narrow the exception language for catastrophic fire.

By the definition given (3-99) ALL fires are catastrophic on most counts; including prescribed ones. (Individual, Deer, AR - #44200.31100)

The draft policy states that the exceptions are not intended to cover "routine forest health activities, such as temporary road construction for thinning to reduce mortality due to insect and disease infestation. However Forest Service managers in the past have commonly viewed wild fire, blowdown, and other natural disturbances as "catastrophic events" that warrant salvage logging. In fact, the rather loose definition of what constitutes catastrophic fire, "A wildland fire that may do one or more the following: burn large acreage (1,000 plus acres); kill most of the trees; significantly alter habitat; adversely affect water and/or air quality; and damage the soil" is too open-ended to be meaningful. The word "catastrophic" should be reserved for events that destroy human life and property. (Environmental/Preservation Organization, Washington, DC - #43731.32000)

If a person requires an emergency rescue, a helicopter response team would most likely be faster and much less expensive to the forest ecosystem than logging through the forest to make a road. (Environmental/Preservation Organization, Weldon, CA - #16041.90310)

REQUIRE INHOLDERS TO TAKE RESPONSIBILITY FOR FIREPROOFING PROPERTY

The imminent threat of fire should not be justification to log through public forests to protect private property, which would result in the loss of the roadless characteristics and the fire prevention characteristics of the forest. The private property owner should take the responsibility to protect his or her property from fire rather than relying on the agency to log a roadway for firefighters to protect private property. This kind of land exchange is not equitable when the public loses public lands because private property owners fail to adequately protect private property. The private property owner should be required to clear around private structures and to install fireproof roofing on all private property structures, so emergency roads do not have to be constructed through public lands. (Environmental/Preservation Organization, Weldon, CA - #16041.90310)

Statistics regarding population density patterns. Why is the USFS automatically expected to be responsible for people's homes? The people that live in the WUI must make every effort to protect their homes and property through planning for the eventuality of a fire in their area. Living in this zone is a lifestyle choice for many, and they must accept and plan for wildfire risk. (Individual, Leavenworth, WA - #15897.90100)

Public Concern: The final rule should narrow the exemption language for protection of property to "constructed property."

The exception for roads that are "needed to protect life and property" should be clarified to protect life and prevent "significant loss of constructed property, such as buildings and bridges." (Environmental/Preservation Organization, Eugene, OR - #55101.32000)

Public Concern: Rather than authorizing the removal of hazard trees in the exemption for public safety, the final rule should include guidelines for alternative hazard management strategies.

Rationalizing building roads for public health and safety reasons…for loggers to remove trees that are dead or dying (so-called "hazard trees") because there is a possibility for these dead or dying trees to fall on a person walking in the forest, will only continue to cut down and fragment the forest habitats. The Forest Service has failed to preserve the National Forest wildlife habitats and ecosystems using this rationale… You must do what needs to be done to preserve the ecosystem, not cut it down. Removal of these so-called "hazard trees" from the habitat, rather than downing the trees and leaving them as down logs in the forest, would decrease wildlife nesting sources and soil nutrient sources, and will constitute the opposite of the ecological restoration criteria of "immediately stop(ping) activities that have the greatest likelihood of degrading desirable characteristics" and "Restoring an area to historic ecological conditions." These public safety issue trees could instead be felled, their branches removed and the trunk of the tree left on the ground in order to further the transition back to a natural forest. These trees could also be artfully topped and left standing in the forest as habitat, as is done by North Cascade National Park. The "hazard tree" guidelines for Marble Mountain District, North Cascade National Park, Washington, rarely use logging to remedy "hazard tree" conditions. (Environmental/Preservation Organization, Weldon, CA - #16041.84000)

[O]utside the forest, hundreds of people have died each year because of automobile and airplane accidents, but cars and planes are allowed to remain in our society. Hundreds of people have died each year from bacteria-tainted hamburgers, but ground meat is still allowed to remain in our society. Thousands of people have died each year from failed operations, but doctors still practice in our society. According to the Centers for Disease Control, 80,000 people died in 1999 from hospital-acquired infections, but hospitals are allowed to remain in our society. Each year 150 children are killed on "all terrain vehicles" (ATV's) but ATV's are not banned from our society and the Forest Service proposes building more trails for off-road vehicle use. There are very few accidents or deaths each year caused by a tree or a branch in the forest, so the forest should not be cut down because of the possibility of an accident from a falling tree or branch. There is a much lower number of accident incidences from hazard trees than from many other societal causes of accidents and deaths (drugs, knives, hand guns, etc.), yet the Forest Service proposes allowing to remove these trees because they are a "potential" public safety hazard. (Environmental/Preservation Organization, Weldon, CA - #16041.84000)

Public Concern: The Forest Service should relax the exemption for public health and safety.

The exception in Sec. 294.12 (b)(1) is way too restrictive in that it allows a justifiable road only for an imminent threat of a catastrophic event. The exception ought to be worded to say "(a) road is needed to protect public health and safety." (County Elected Official, Provo, UT - #13564.10210)

Public Concern: The Forest Service should insert "A road is needed to carry out the multiple uses provided for in the authorities cited for these regulations" following Section 294.12(b)(4) of the Draft EIS.

ADDITIONAL EXCLUSION MUST BE ADDED TO SECTION 294.12(b). The following item should be inserted after Section 294.12(b)(4): "(5) A road is needed to carry out the multiple uses provided for in the authorities cited for these regulations." (Mining Association, Reno, NV - #15907.3110)

Public Concern: The Forest Service should consider broadening exceptions in the final rule to include special use permits for scientific research projects.

We are concerned that there are areas within California and across the nation where scientific and educational endeavors may be unintentionally curtailed due to conflict with the proposed Roadless Area Conservation Rule. As noted in our letter dated December 17, 1999, we are interested in relatively small parcels of land within the Inyo National Forest, California, which we may request to use to improve the national effort in millimeter wave astronomy. This use would have a very limited effect on the environment….Although we believe that assessing every type of exemption would be unreasonable, we also believe that the Rule should recognize special uses other than the non-recreational, commercial and non-commercial special uses noted on page 3-141 of the DEIS. The uses noted on page 3-141 are broadly characterized as uses that "generally, but not always, rely on road access to accommodate construction, operation and maintenance. As such, the majority of existing and proposed uses are either located or proposed to locate where roads currently exist." The ability to construct, and operate special, research-oriented projects without road access is overlooked in the document, and should be more specifically addressed as an exemption or approved special use. (University, Pasadena, CA - #25993.90000)

There is a network of "Snowtel" facilities operated by the NRCS that monitor and track snow levels and moisture content (used in forecasting runoff). We are concerned that the roadless proposal might restrict access to these sites. Access is critical for operation and maintenance as well as for potentially installing new sites. (State Elected Official, Cheyenne, WY - #2816.90333)

Public Concern: Any exceptions made in the proposed rule should be subjected to the proper National Environmental Policy Act analysis process and independent scientific review.

…any exceptions to be permitted to the proposed rule--IN WHATEVER FORM--must be subject to stringent and thorough review to insure that the abuse of such clauses is not a reprise of past management activities. In particular, so-called salvage logging must be prohibited in all inventoried and uninventoried areas and the Tongass. So-called "wildlife management" activities must be subject to NEPA EIS requirements and independent scientific review for validity, as should all activities associated with fire suppression, insect infestation, habitat modification, or any other "forest health" activities. For far too long, such activities have led to the flagrant abuse and destruction of much of our remaining real Forest to satisfy either the timber industry or the intellectual prowess of "wildlife managers." (Individual, Bland, VA - #44198.93320)

6.2.4 Road Decommissioning and Removal

A great many respondents are convinced that the Roadless Area Conservation Proposed Rule will lead to extensive closures of existing roads and to significant reductions in areas for motorized recreation, regardless of the actual language of the proposed rule. Central to this fear is a concern over what the definition of a road will be in the final rule (see Chapter 9). While the proposed rule claims to ban only new roads, the Forest Service should clarify whether it would lead to closure of existing roads and trails, numerous recreationists assert. The Forest Service should report the rate of current road decommissioning and the effects of the rule in the Final EIS, some remark. Many forest users maintain that the Forest Service should assure no net loss of road and trail miles so that their recreational needs will still be fulfilled. Some mention that the existing road system is needed for search and rescue, as well as for a multitude of other uses.

Among those members of the public who believe that roads can be environmentally harmful, some suggest that the Forest Service should permanently close roads not essential to forest maintenance. To this end, individuals propose that the Forest Service install physical barriers on many existing roads to minimize environmental damage from continued vehicular access. Some request that the Forest Service convert decommissioned roads to non-motorized trails. Others feel that the Forest Service should give priority to closing private roads which extend into the national forests but which are not accessible to the public.

Numerous respondents advocate that the final rule should require that roads in inventoried roadless areas be decommissioned in order to restore those areas to their formerly unroaded condition. Notes one environmental organization, "It seems more than coincidence how some of the 1980's and 90's roads were punched into . . . RARE inventoried RA's, technically reducing them to less than 5,000 acres in size. These roads, often used to access only a single timber sale in the heart of a roadless area, should be decommissioned to move toward restoration of these areas to their unroaded condition." Some respondents recommend decommissioning of specific roads.

While a large number of people recommend active decommissioning of roads, many others strongly oppose this practice and state that the Forest Service should not remove roads. Some question the methods used by the Forest Service to decommission roads, such as covering them with cut brush, installing tank traps and recontouring. Some suggest that the Forest Service should simply reseed a roadbed rather than remove it, while another contends that asphalt pavement should be removed on decommissioned roads. Many object to road obliteration because it can be more environmentally destructive than the continued presence of the roads themselves. One suggestion is that the Forest Service convert existing roads to trails rather than eliminate them entirely.

Public Concern: While the proposed rule claims to ban only new roads, the Forest Service should clarify whether it would lead to closure of existing roads and trails.

The fact that this proposal claims to ban only new roads is far from reality. The truth is that there are many trails, jeep tracks, and other areas that accommodate motorized traffic in some way or another. These pathways provide transportation to rural residents and routes for others to arrive at favorite recreational destinations. Many of these roads are not officially recognized as roads and the battle over what a road really is continues to rage. If this rule is enacted, thousands of these small roads and trails will be ignored and will be absorbed as part of a "roadless forest." Therefore, the so-called banning of new road building will also have the effect of dismantling many existing roads. (Individual, Salt Lake City, UT - #6753.91710)

This plan only covers classified roads. Where do the four wheel drive roads go into the plan? None of these roads have been accounted for. (Individual, Tucson, AZ - #13310.32100)

In the intro a comforting statement reads "No roads or trails would be closed because of these prohibitions." Later I read that "unneeded roads would be decommissioned." This concerns me greatly because most of the trails I have ridden at some point end at a dirt road. In order to connect to the next trail I have to ride down these roads. Would these roads be "decommissioned" and therefore block my access to some of the trails I enjoy riding? (Individual, Chatsworth, CA - #5532.10212)

It says that "No roads or trails would be closed. Areas now open would remain open." Why are they moving locked gates down the roads, making Reese traps, and generally trying to close roads that have been open for 50 years? (Individual, Pierce, ID - #10735.91710)

Given the…Road Management Plan's stated goal of "aggressively decommissioning unneeded" roads, how will the public be assured that the roads currently existing in a so-called "roadless" area will not automatically fall into the "unneeded" category by virtue of their location within the "roadless" area. (Recreational Organization, Los Alamos, NM - #5663.72220)

Public Concern: The Forest Service should report the rate of current road decommissioning and the effects of the rule in the Final EIS.

Pg. 3-13 Forest Service Road System. This Section needs to include a map showing planned road construction by region.
Pg. 3-15 indicates that road construction has declined to about 192 miles a year in 1999 with decommissioning of nearly 2,660 miles of road per year resulting in a net loss of 2,468 miles per year. This represents a cumulative impact that should be analyzed along with the roadless initiative. Please provide a discussion of the types of roads decommissioned each year. How many miles would affect the inventoried areas? (County Elected Official, Battle Mountain, NV - #43985.33300)

Public Concern: The Forest Service should assure no net loss of road and trail miles.

I suggest that the USFS follow a simple policy to mitigate this closure problem. For every mile of road or trail closed by the Roadless Initiative, the USFS be required to identify in cooperation with recreationist groups an equal amount of similar trails to replace the lost access. This rule would eliminate any "hidden agenda" effect of the roadless designation process. (Individual, Valyermo, CA - #172.61300)

Please do not remove [roads] because you simply think it will make it better.…These old roads are not expanding, we lose roads every year. It is never the case that roads are added. (Individual, No Address - #8620.84610)

Public Concern: The Forest System should maintain access to the road system for search and rescue.

We need ACCESS FOR SEARCH AND RESCUE efforts. The cost and effort required for search and rescue in the absence of roads is very high in time, money, safety and lives. (Individual, West Point, UT - #4008.93622)

The road systems affected by the NPRM make helicopter use in search and rescue, fire suppression, animal control and law enforcement missions possible, because helicopters are short-range aircraft that need ground support teams and equipment nearby when conducting operations in remote locations. Other forms of transportation available to emergency response and law enforcement personnel are even more dependent on roads for access to remote areas than are helicopters. (Business/Business Association, Alexandria, VA - #29960.90000)

Public Concern: The Forest Service should permanently close roads not essential to forest maintenance.

The Forest Service must immediately commence the permanent closure of 80% of all roads not essential to forest maintenance. (Individual, Carlsborg, WA - #10562.64150)

As a resident of Oregon, I find that there are far too many logging roads in our forest now! Not only do I support the effort to ban further roads, but I think that about 50% of existing roads should be abandoned. (Individual, Albany, OR - #2391.10100)

I urge you to close, obliterate and revegetate at least half the total miles of roads in all national forests… (Individual, Oakland, CA - #311.64150)

And if you really want to make a difference, obliterate some of the old roads that are already scarring our land and are no longer used! (Individual, Glenwood springs, CO - #6404.84610)

Please reclaim all the old logging roads. (Individual, Watertown, NY - #5622.84610)

I support every attempt to close roads on the national forests. I support this roadless initiative and I believe you could close even more roads. (Individual, San Cristobal, NM - #319.71300)

I would like to see a significant amount of road closures (up to 50% of existing roads) to reduce maintenance costs and enhance wildlife habitat. (Individual, Laramie, WY - #3604.71300)

Please reduce the number of dirt roads in the Medicine Bow NF. Make larger areas non-accessible to motorized travel. (Individual, Laramie, WY - #6871.91610)

Public Concern: The Forest Service should install physical barriers on many existing roads to minimize environmental damage from vehicular access.

The USFS should immediately gate many existing roads to keep out poachers, ORVs, ATVs, and others who harm wildlife and degrade habitat. BLM roads in my watershed were gated two years ago to keep vehicles from entering and spreading spores of the Port Orford root rot disease. I and my neighbors have noticed a dramatic improvement in our watershed since the gates were installed, including increased wildlife sightings, much less trash along roads, less sedimentation in creeks, and other benefits. (Individual, Oakland, CA - #311.83000)

In a desert like Los Angeles, part of Mulholland Highway is blocked off at two ends in a dirt road area. It is almost miraculous how the brush is repairing the scars of years of illegal off-roaders. After the brush provides some shade, the oak and sycamore sprouts will come…. I hope this road block is made permanent too. I have never seen as many people hiking and just walking in the area as I have on the road and trails in the past year. It is an attraction. It provides value while healing. I hope you will let the healing begin and continue on all our lands. (Individual, No Address - #1899.84600)

Public Concern: The Forest Service should convert decommissioned roads to non-motorized trails.

I would also point out that roads used to log can be left in place and blocked off so that they cannot be used by motorized vehicles but can be enjoyed by people (hiking, etc.) and animals (moose and bear, for example, prefer well-defined paths at times). (State Elected Official, Anchorage, AK - #17254.80000)

Public Concern: The Forest Service should give priority to closing private roads which extend into the national forests but which are not accessible to the public.

When roads are to be closed, the first and most obvious category for closure must be those roads that extend into the national forests from private land and are not accessible to the public. In other words, the remaining roads left open for travel on national forests must be available to everyone and not part of an exclusive use pattern that only benefits a few individuals. (Wise Use or Land Rights Organization, Billings, MT - #830.10212)

Public Concern: The final rule should restore inventoried roadless areas by decommissioning roads and returning these areas to their unroaded conditions.

It seems more than coincidence how some of THE 1980'S AND 90'S ROADS WERE PUNCHED INTO AND FRAGMENTED RARE INVENTORIED RA'S, technically reducing them to less than 5,000 acres in size. Locally this comes to mind with the MOOSE LAKE RA OF THE WILLAMETTE NATIONAL FOREST. THESE ROADS, OFTEN USED TO ACCESS ONLY A SINGLE TIMBER SALE IN THE HEART OF A RA, SHOULD BE DECOMMISSIONED TO MOVE TOWARD RESTORATION OF THESE AREAS TO THEIR UNROADED CONDITION. (Environmental/Preservation Organization, Albany, OR - #6506.83421)

All existing roads within inventoried roadless areas should be immediately decommissioned. This requirement should be added to the EIS. (Individual, Richland, WA - #1006.71300)

Small abandoned roads, such as Mineral Fork, or White Pine, make poor boundaries for several reasons. Wilderness boundaries should go from ridge crest to ridge crest. This would virtually "wipe out" heli-skiing from the tri-canyon area, and keep Snowbird from ever expanding into White Pine. (Individual, Salt Lake City, UT - #15933.90240)

I…support demolishing roads in national forests to improve roadless areas. I have had the fortune to travel to other places around the world. When I compare wilderness and some roadless areas in the United States to other areas, there are far too many roads in the national forests. In some places, such as in my home state of Colorado, almost every ridge top and valley has a road. These roads are within a mile or less from each other. Wilderness and roadless areas cannot be simply defined by starting at the immediate side of a road. The distance between roads must be enough to support wildlife and ecosystems without any visual interruptions. Many existing areas are too small and have roads too close together. (Individual, Lakewood, CO - #2122.64150)

Please respect and support the President's directives to the Forest Service to halt all road building in roadless areas on the National Forest System. Please where possible reverse the negative impact of roads already built by restoring those areas to their natural condition. (Individual, Normal, IL - #332.10100)

I support no new road construction in roadless areas. Road obliteration should be planned for roads recently built into inventoried roadless areas. (Individual, Republic, WA - #695.84610)

Public Concern: The Forest Service should pursue the decommissioning of specific roads.

Put the "Highway" from Warm Lake to mouth of E. FK of S. Fork of Salmon back to trail status. (Individual, Boise, ID - #5856.84610)

Public Concern: The Forest Service should not decommission roads.

I strongly oppose the proposed new rules prohibiting building of new roads or reconstruction of existing roads in inventoried roadless areas. As a resident of the Lake Tahoe Basin, I am aware that public funds are already being wasted 'decommissioning' existing roads at a cost of approximately $100,000 a mile. (Individual, No Address - #2236.93641)

Public Concern: The Forest Service should reconsider the methods used to decommission roads.

DO NOT COVER ROADS WITH CUT BRUSH

The practice of covering a road with miles of cut brush to make it impassable for foot traffic, human or animal, is particularly offensive. The only apparent purpose is to benefit future logging as the road can be readily cleared again with heavy equipment. (Individual, Noxon, MT - #3406.93610)

REPAIR TANK TRAPS

I feel that the "tank traps" that were used to close hundreds (if not thousands) of miles in the Island Park, Idaho area are illegal and that the Forest Service should be made to repair them. (Individual, No Address - #6762.71300)

RESEED OR ABANDON RATHER THAN RECONTOUR

Obliteration of roads is a ludicrous idea; the cost may be more expensive than the roads cost in the first place. Erosion may be nearly as severe as the original construction, just like pulling the scab from a healing wound. Grass seed and Mother Nature will soon stop any erosion while the road is allowed to sleep. No preparation cost other than seed and one person to do seeding is needed. The grade will always be there and the road can be reopened cheaply for management or emergency. The roads turn into game trails and hunter access. (Individual, Corvallis, MT - #6628.86410)

Allow unwanted roads to die by attrition rather than expend hours and materials to block and post. (Individual, John Day, OR - #1285.10211)

REMOVE ASPHALT PAVEMENT ON DECOMMISSIONED ROADS

I would like to see the black asphalt pavement of decommissioned roads ripped out. (Individual, No Address - #2479.71300)

Public Concern: The process of closing or decommissioning roads can be more environmentally destructive than the presence of roads.

The vast majority of existing roads have been placed in locations that avoid breaching riparian areas. Road drainage is well engineered to minimize erosion, and the subsoil forms a superior, permanent roadbase. As a result, many of these roads have been in use, without ANY maintenance, for nearly 50 years. In the last 3 or 4 years, the Service has undertaken a program of 'reclaiming' these roads, but now we are not so fortunate. In a misguided and poorly planed undertaking, roads are being destroyed with this obvious goal: CLOSE OFF THE MOST ACCESS WITH THE LEAST AMOUNT OF MONEY. This results with a plan that becomes quite simple: Using a Caterpillar-type dozer, the Service operator simply drops the ripper shanks and teeth, crawls down the road, then (maybe) scatters grass seed in the wake of destruction. In the five-mile radius closest to the Bow River Ranger Station, more than thirty miles of road have been destroyed this way. Unfortunately, this program has brought devastating consequences to the environment. Natural drainage patterns have been

disrupted. Spring runoff is channeling into former roadways, flushing away everything smaller than golf-ball-size rocks. Sand and silt are being deposited in huge quantities into the Medicine Bow River….Is the Service exempt from the Clean Water Act? (Wise Use or Land Rights Organization, Rock Springs, WY - #2866.83200)

…[I]t is obvious that "reclaiming" these roads to "pre-European settlement" (your definition) is at best, prohibitively expensive, and at worst, impossible. "Reclaiming" them to any lesser degree will be an environmental disaster. Why not leave them alone? (Wise Use or Land Rights Organization, Rock Springs, WY - #2866.84610)

Public Concern: The Forest Service should convert existing roads to trails rather than eliminate them.

I am not in favor of any initiative which wastes the roads already in place, which if the area needs it, could be converted to motorless trails for hikers, bicyclists, and equestrians.
Not building any new roads may be an excellent idea, but if the road is already there, don't waste it, convert it. Perhaps repair half for bikes and hikers, and return the other half to turf for equestrians--thus making some nice wide trails.
Repair of these trails, or conversion, serves the needs of the public much better than closing these lands to people by eliminating the roads, which could end up eliminating the only way to a trail head or more remote camping spot. (Individual, No Address - #6996.91750)

Please do not restrict our use of roads & trails. If roads are not needed please add them to the trail inventory. (Individual, Newark, CA - #7292.91700)

Please accept our concern regarding access to all the travel routes in the Big Bear area. We love to travel to different areas in the mountains. If the travel routes are closed we will not be able to access the areas and enjoy them. Please do not close access to our public lands. Please keep the travel routes open to drive through as part of the trails system, as covered under Chapter 2352 of the Forest Service Manual. (Individual, Redondo Beach, CA - #142.10212)

6.2.5 Trail System Management

While most comments from the public regarding travelway infrastructure discuss the road system, some respondents are also concerned with the future of the trail system in roadless areas. The Forest Service should clarify whether the proposed rule would affect new trail construction and maintenance, some request. Some fear that the proposed rule will unacceptably limit trail maintenance and construction due to new restrictions on ground-disturbing activities.

Others feel that to assure full protection of roadless area characteristics, the Forest Service should avoid building trails in roadless areas to the greatest extent possible. Some narrow this request to prohibiting only motorized trails in roadless areas. Some respondents suggest that the final rule replace the phrase "of any size" in the proposed version with language limiting trail size in inventoried roadless areas to U.S. Forest Service pack and saddle standards unless otherwise authorized in a forest plan.

On the other hand, some encourage the Forest Service to increase the number of hiking trails in roadless areas, while others encourage the agency to construct new trails for mountain bikers and motorized recreationists. One individual, in particular, admonishes the Forest

Service not to use the threat of lawsuits as a rationale for limiting trail building. Another respondent asks that when roadless areas are officially designated, any nearby trails that are partially on county roads should be rerouted through the roadless areas. Finally, some request that the Forest Service maintain rather than close damaged motorized trails.

Public Concern: The Forest Service should clarify whether the proposed rule would affect new trail construction and maintenance.

Does the rule affect new trail construction of any kind? (Individual, Pocatello, ID - #2959.91000)

The DEIS does not indicate how the decisions would or could impact the State's Trail Program, which allocates grants for trail related maintenance and development. We ask that a coordinated State-Forest Service approach be emphasized in analyzing appropriate use of these funds in both roaded and roadless areas. (State Elected Official, Helena, MT - #19289.91000)

Public Concern: The proposed rule should not be implemented because it bans most "ground disturbing activities" which will preclude necessary trail maintenance and construction.

I oppose the roadless initiative because it bans most "ground disturbing activities." As a mountain biker and dirt biker, I depend on trails. The roadless initiative will prevent the maintenance of existing trails as well as the construction of new trails. Even if trail maintenance isn't banned, the roadless initiative could make it more difficult to carry maintenance equipment such as chainsaws and Pulaskis into the forests. Without maintenance, trails can become eroded and covered with deadfall. Deadfall and erosion can lead to unsafe trail conditions as well as illegal cut-around routes. Eventually, the lack of maintenance caused by the roadless initiative will result in the closure of the trail on the basis of it being an eyesore. (Individual, Fort Collins, CO - #11334.91700)

Public Concern: The Forest Service should avoid building trails in roadless areas.

With few exceptions, roadless lands should be managed as little as possible. The closer these lands can remain to natural landscapes the better. By that I mean that they should not be allocated to any use other than resource protection. Formal trail construction should be avoided. (Individual, No Address - #5137.10100)

I prefer Alternative 3. However, I fear that the existing uses will be overly exploited. More new trails could be built for "viewing from atop your horse" or "screaming down on your mountain bike." If this is the intent, more roads will be maintained than otherwise and more trails will be maintained and built. (Individual, Bend, OR - #533.64130)

Public Concern: The final rule should prohibit the construction of new motorized trails in roadless areas.

In my view, a motorized trail has similar negative effects on wildlife and biodiversity. Consequently, roadless areas also need to be free of motorized trails. NO NEW MOTORIZED TRAILS. The internal combustion engine is everywhere. Keep it out of the remaining roadless areas. (Individual, Beulah, CO - #607.91610)

"Any size and number of motor vehicle roads can be created, even in 10,000, 50,000 or 200,000-acre inventoried wild lands, as long as they are labeled "trails." The proposed action is far weaker than current management on national forests such as the Helena National Forest, which already analyzes the effects of relevant projects such as timber sales, oil and gas leasing and travel plans on conservation of roadless characteristics. (Individual, West Glacier, MT - #52497.71300)

Public Concern: The final rule should replace the phrase "of any size" with language limiting trail size in inventoried roadless areas to U.S. Forest Service pack and saddle standards unless otherwise authorized in the forest plan.

The exception language in Part One allowing motorized trails "of any size" to be constructed in inventoried roadless areas is too broad and fails to take into account regulations governing planning (36CFR 219.21 (g)) and the use of motor vehicles off forest development roads (36CFR 295).
The final rule should strike the words "of any size" and replace it with language limiting trail size in inventoried roadless areas to U.S. Forest Service pack and saddle standards (12-24 inch tread width) unless otherwise expressly authorized in the forest plan. (Environmental/Preservation Organization, No Address - #18652.91610)

Public Concern: The Forest Service should increase the number of hiking trails in roadless areas.

Increase the number of hiking trails through this beautiful high country. (Individual, Laramie, WY - #6871.91740)

Public Concern: The final rule should allow construction of trails for mechanized and motorized users.

ATV trails, snowmobile trails, MT bike trails should all be permitted to be constructed. (Individual, Carson, WA - #13433.91700)

The agency should develop new trails…for motorized recreation. (Individual, Lander, WY - #13200.91700)

THE FOREST SERVICE SHOULD NOT USE THE THREAT OF LAWSUITS TO LIMIT TRAIL BUILDING

"Activities in roadless areas that alter roadless characteristics create public controversy, appeals, and lawsuits." I am concerned that this statement can be used to prevent building new OHV trails in our roadless areas. PLEASE DON'T CLOSE OUR ROADLESS AREAS. THEY ARE ROADLESS FOR A REASON--THE LAND IS MARGINAL FOR TIMBER, THE TIMBER COMPANIES DON'T WANT TO PUT ROADS THERE ANYHOW. (Individual, No Address - #9756.91710)

Public Concern: When the roadless areas are created, any nearby trails that are partially on county roads should be rerouted through the roadless area.

When the roadless areas are created, any trails in the vicinity, that are currently partially on County roads, should be rerouted through the newly created wilderness. The Forest Service should encourage local authorities to do this rerouting of any trail that would fall into this category. (Individual, Jacksonville, IL - #3409.71300)

Public Concern: The Forest Service should maintain rather than close damaged motorized trails.

The foot of motorized recreation is being stuffed into a rapidly shrinking boot and it pinches. More and more people are enjoying this type of recreation, while we plan for more restrictions and fewer places to use. Instead of seeing a damaged trail as a reason to close the area, we should look at ways to repair and improve the trail so more people can use the area without damage. (Individual, Lander, WY - #13200.91700)

6.2.6 Ways

Many recreational users of public lands express concern over the unofficial, user-created road and trail system. Many motorized users fear that these trails will not be considered roads, thus these areas may be considered roadless and motorized pursuits restricted. "There are many trails which are currently used by ATVs. They are not roads. Does your proposal mean that these trails will be considered ROADLESS and ATVs will be banned?" queries one worried rider. A great many other recreationists decry the proliferation of motorized user-created ways, and urge the Forest Service to decommission all illegally established roads in inventoried roadless areas. "There are also many roads that are not currently shown on the maps and I would encourage these be considered for elimination in the travel plan. These roads have been created at an alarming rate in the past few years by all terrain vehicles," writes one concerned citizen. Many others feel that the Forest Service should close all unauthorized or unofficial roads to all forms of motorized travel.

Still other backcountry users observe that many trails are being illegally widened by OHV usage. They call for the Forest Service to prevent dirtbikes and OHVs from converting former trails into ATV roads. "These [pack and saddle] trails are 1/4 to 1/2 the width of an ATV. Roadless trails 12-24 inches wide…have become 5-10 feet wide ATV roads. As levels of ORV traffic increase, traditional forest visitors are displaced" and the environment severely impacted, observes one individual. Many people ask that the Forest Service cease and desist incorporating these illegal trails into the official trail system because this only encourages further creation of illegal trails. However, some motorized users feel that the solution to this increasing problem is to maintain existing OHV trails and create more trails to keep users from doing so themselves. "If the trails were kept up and more were made, you may not have a problem with people making their own trails in the forest," one OHV enthusiast suggests.

Public Concern: The Forest Service should clarify whether ATV trails will be considered roadless and ATVs banned.

There are many trails which are currently used by ATVs. They are not roads. Does your proposal mean that these trails will be considered ROADLESS and ATVs will be banned? (Individual, Hyrum, UT - #2927.32000)

Is a motorized trail considered the same as a road? (Individual, Pocatello, ID - #2959.32200)

Public Concern: The Forest Service should decommission illegally established roads in inventoried roadless areas.

Not only would I like to see all new road construction halted in roadless areas, but I think you should decommission existing illegally established roads in inventoried roadless areas. (Individual, Basin, MT - #7381.84610)

There are also many roads that are not currently shown on the maps and I would encourage these be considered for elimination in the travel plan. These roads have been created at an alarming rate in the past few years by all terrain vehicles. (Individual, Helena, MT - #11228.84610)

Public Concern: The Forest Service should close all unauthorized or unofficial roads to all forms of motorized travel.

Actually I would like to see all unauthorized/unofficial roads that individuals have created in all National Forest areas closed to all forms of motorized travel. I spend up to eight weeks a year camping, hiking and fishing in the National Forests and the increased intrusion of motorized travel is getting to be a very serious problem affecting the ecology of large areas. Stopping the construction of new roads is a good FIRST STEP. (Individual, Gunnison, CO - #6483.91610)

Public Concern: The Forest Service should prevent dirtbikes and all-terrain vehicles from converting trails into all-terrain vehicle roads.

Please prevent dirtbikes and all terrain vehicles from converting Montana trails into ATV roads. (Individual, Choteau, MT - #185.61300)

Thirty pack and saddle trails in the Hyalite-Porcupine-Buffalo Horn Wilderness Study Area (202,000 acres) bordering Yellowstone National Park (Gallatin National Forest) were opened to ATVs by altering forest visitor maps. Like most roadless Forest Service trails, these trails are 1/4 to 1/2 the width of an ATV. Roadless trails 12-24 inches wide, such as Rock Creek Trail #178 (Livingston Ranger District) have become 5-10 feet wide ATV roads. The 200 grizzly wolverine, lynx, elk and bighorn sheep habitat. ORV use quickly becomes a dominant use. As levels of ORV traffic increase, traditional forest visitors are displaced. Impacts to wildlife and fragile mountain headwaters from the use of vehicles off forest roads are rarely monitored in Region One forests, winter or summer. Entire mountain ranges, such as the rugged Crazy Mountains (137,000 acres) held sacred by the Crow Nation (Gallatin and Lewis and Clark National Forests) are being used as a testing area for self-described “extreme motor sports.” (Individual, West Glacier, MT - #52497.91712)

Public Concern: The Forest Service should not encourage the creation of illegal trails by incorporating them into the official trail system.

In the Abajo Mt., ORV users have ripped trails through roadless areas…This was pointed out to the District Ranger…Instead of closing the illegal trail [he] decided to maintain the trail, install a sign, and construct a parking area, all without due process and in violation of environmental laws and Forest Service policy. I ask that you order this illegal trail closed. Agency’s encouragement of use on created trails in roadless areas violates Forest Service policy. (Individual, Oliver Springs, TN - #1698.91612)

Public Concern: The Forest Service should prevent Illegal trail development by maintaining existing trails and creating more trails.

If the trails were kept up and more were made, you may not have a problem with people making their own trails in the forest. (Individual, No Address - #3455.93610)

6.3 Commodity, Extractive, and Commercial Activities

This section presents a range of concerns regarding commodity extraction and commercial activities on National Forest System lands. They are divided into sections as follows: 6.3.1 Timber Harvest, Commercial; 6.3.2 Silvicultural Methods; 6.3.3 Adequacy of Analysis, Timber Harvest; 6.3.4 Timber Harvest, Stewardship, and Forest Health; 6.3.5 Fuel Reduction and Fire Management; 6.3.6, Grazing; 6.3.7, Locatable and Leasable Minerals; 6.3.8 Alternative Resources and Energy Sources; 6.3.9 Utility and Water Delivery Systems and Infrastructure; and 6.3.10 Ski Area Permits.

6.3.1 Timber Harvest, Commercial

Numerous respondents discuss possible prohibitions on timber harvest, given that two of the three action alternatives include such measures. Many feel that the Forest Service should choose Alternative 3 or 4 rather than the Preferred Alternative 2 because road building restrictions would still allow significant timber harvest. According to the Draft EIS, the Preferred Alternative will reduce the timber volume offered from 16,500 MMBF to 15,700 MMBF. A great many proponents of roadless area conservation do not feel this goes nearly far enough, while opponents question this analysis and feel that much more timber volume will be ultimately affected. Many timber companies, employees and individuals vehemently oppose all action alternatives, and feel that the Preferred Alternative will constrain timber harvest activities too greatly.

Opponents question how the Forest Service will meet its obligation to “furnish a continuous supply of timber for the use of U.S. citizens.” Some fear that the potential timber supply deficit will be covered by lumber from international sources. One individual, however, asserts that the proposed rule will not reduce overall timber harvest levels because timber extraction quotas will be made up from different areas of the national forests. On the other hand, at least one respondent feels that allowance for increased timber sales in roaded areas should be included in an alternative. Some suggest that the Forest Service should institute a policy to encourage the public to reduce the consumption of forest resources. One Oregon timber company believes that consumers should be taxed on the purchase of nonrenewable resources to aid in lowering the consumption of these resources. Another respondent, however, claims the No Action Alternative should be chosen precisely because we do not know what society’s needs will be in the future.

Supporters of the proposed rule feel that the Forest Service should end timber harvest in roadless areas because relatively little timber volume will be affected and private timberlands

can adequately supply the nation's wood product needs. Others feel that the Forest Service should acknowledge that current timber harvest methods do not result in the destructive effects of past practices, and therefore should not be restricted. "Our industry is paying for the sins of our fathers. We are not the only industry in this predicament; the salmon fishery in the northwest is hurting as well . . . . While we should learn from our mistakes (and we have) we should not be held accountable for actions we no longer practice that were standard operating procedure at that time," contends one timber company.

Some individuals assert that the Forest Service should end logging entirely in the national forests, not just in roadless areas. One individual specifically requests that it be ended in the Prescott National Forest. The majority of respondents feel that the proposed rule does not go far enough, and request that The Forest Service should assure the final rule restricts timber harvest to a much greater degree than in the Preferred Alternative. They believe the Preferred Alternative does not meet President Clinton's mandate. Many feel that the Forest Service should restrict or completely prohibit timber harvest in roadless areas for many reasons. Some feel there is clear evidence that past levels are unsustainable; others feel that designated wilderness areas need to be buffered from timber harvests and clearcuts. Others request that the Forest Service focus on existing roaded, lower elevation, second-growth stands to furnish a sustainable supply of timber. One individual asserts that on the contrary, many of the second growth stands will not regrow to harvestable size for decades and therefore the Forest Service should allow timber harvest in roadless areas to sustain the timber industry.

Many urge the Forest Service to prohibit harvest of old growth forests in the final rule. One individual suggests logging be halted on any stand of trees aged 200 years or more occupying an area greater than 10 acres. Many express fervent support for preserving the remaining truly wild and intact unprotected forests from harvest because replanted tree monocultures are an inadequate replacement to humans, native plants, and wildlife alike. A common issue for many individuals and organizations who support a more restrictive final rule is the request that all national forests, including the Tongass, be covered. Many express grave concerns that a delay until 2004 will assure the destruction of irreplaceable southeastern Alaska resources.

Among advocates for alternatives 3 and 4, some request that the Forest Service should reassess the exceptions made in Alternative 3 for timber harvest for stewardship purposes and for the salvage removal of fallen and dead timber. Many people call for the Forest Service to cancel all proposed timber sales in roadless areas. Others are concerned that the Draft EIS fails to reveal projected timber harvest after 2004, and that increased sales may be planned after that date. One individual requests that the Forest Service discontinue giving Plum Creek Corporation timber credits.

According to numerous other respondents the Forest Service should continue active timber management and commercial harvest on forest system lands, including roadless areas. "Forests are dynamic systems and should be actively managed to promote resilience against destructive agents, while providing a sustainable level of wood products and recreational opportunity," writes one person. This sentiment is common. A great many people feel that

timber harvest is needed for forest health as well as for economic reasons (see Sections 6.3.4 and 6.3.5 for forest health concerns and Chapter 7 for economic considerations). The Forest Service should allow roads for timber management within National Forest System lands, conclude many opponents to the Preferred Alternative. One timber company feels that the Forest Service has devised the proposed rule to avoid dealing with the fact that national forests have failed to meet set targets for timber production within existing forest plans. Given the restrictions on timber harvest instituted with the Northwest Forest Plan, some request that the matrix lands designated for harvest not be included as roadless areas. Finally, some residents of Minnesota remind the Forest Service to keep its promise to them assuring continued timber harvesting outside the Boundary Waters Canoe Area.

Public Concern: The Forest Service should address how it will meet its obligation to "furnish a continuous supply of timber for the use of U.S. citizens."

If the Forest Service insists on going forward, a new NOI should be developed that includes: address how the FS will meet its obligation to "furnish a continuous supply of timber for the use of U.S. citizens." (Individual, Titusville, PA - #905.93340)

And, as the amount of available resources dwindles, the population continues to grow. The impact on the land that is available for use becomes more serious. Eventually, with our available natural resources locked up, or used up, America could become dependent on foreign imports for timber, oil, minerals, and perhaps eventually even food. What happens to the balance of payments in the world economy then? What if the nations we depend upon decide they are no longer our friends? America became a great nation, and a great world leader because of our wealth of natural resources. Shall we lock up more and more of these assets forever? (Individual, Richfield, UT - #7508.93000)

Chapter 3 extensively references the supply side of resource use (affected environment discussions) but this is the only section that refers to the demand side. Each following section needs to fold in resource demand so one reviewing the document may make a reasonable comparison of impacts. (County Elected Official, Worland, WY - 16185.71220)

Public Concern: The proposed rule will place greater demands on international timber resources.

Since this EIS proposes setting national policy and changing the traditional multiple-use management practices…the impacts will no doubt be global in nature. For example, the roadless proposal significantly reduces potential timber harvest…needed to meet national demands. To satisfy the timber and wood product needs of the American people, a greater demand will be placed on global markets. (Individual, Chico, CA - 10596.8500)

Why should U.S. forests not contribute their fair share to the world's need for wood? (Individual, Durango, CO - #7647.93000)

Public Concern: The proposed rule will not reduce overall logging levels on public forests because timber extraction quotas will be made up from different areas of the national forests.

The roadless areas that will receive protection under this proposal will have their timber extraction quotas made up from other areas of National Forests. This plan will not reduce logging levels on public forests at all. The logging levels on National Public Forest lands will remain exactly the same. (Individual, Emerson, KY - #11238.93340)

EXPLICITLY INCLUDE THIS OUTCOME IN AN ALTERNATIVE

An adequate EIS must examine the reasonable alternative of accomplishing the Forest Service's objective of preventing road construction in all inventoried roadless areas in a manner that does not harm the timber production objective stated in each forest plan. The agency should do so by considering an alternative which relies on more intensive management and timber sales in roaded areas of the National Forest System to compensate for the reduced timber production from roadless areas. (Timber Company or Association, Eugene, OR - #15879.64400)

Public Concern: The Forest Service should institute a policy to encourage the public to reduce the consumption of forest resources.

Institute a policy aimed at reducing consumption of the resources that would potentially be extracted from the lands. (Individual, Albuquerque, NM - #12594.90000)

Public Concern: Consumers should be taxed on the purchase of nonrenewable resources to aid in lowering the consumption of these resources.

In the United States, a major part of government is financed by taxes based on what we earn. The federal and state income taxes raise a high percentage of all monies needed to run government. Imagine for a minute how it would effect resource stewardship if we were to shift a major part of this tax to resource consumption and, further, that that tax is primarily on consumption of nonrenewable resources. The take home check of the typical wage earner would increase substantially with little or no income taxes taken out. However, when that person went to purchase many things that cause nonrenewable resources to be consumed, the price would be higher. Using petroleum as an example, gasoline could go up 3-, 4-, or 5-fold. How would this affect resource consumption? Wouldn't more people take public transportation? When they did have to drive, they would do it in a smaller vehicle. The secondary effect of this would be less need for so many roads. Another would be fewer people killed and maimed on the highways. People would look to smaller homes, townhouses instead of huge, single-family homes, etc. In terms of resource use, the tax on consumption would really hit home directly here in the Southwest. The higher cost of nonrenewable energy would make it economical to harvest some of the small trees we so desperately need to eliminate in that biomass generation plants could then compete with coal and petroleum to supply our energy needs. (Timber Association, Medford, OR - #13658.93640)

Public Concern: The Forest Service should the No Action Alternative because we do not know what society will need in the future.

We need to leave our options open for the future. Do not implement any alternative of the EIS that bars road building. There is very little development planned at this time for the concerned areas so there is no danger of their being harmed and the proposal is unnecessary. At this point in time we don't know what society will need 10 or 20 years down the road much less 50 or 100. So let's not box ourselves into a corner by banning roads and

any reasonable alternative of management except nature and letting fire rule our future. (Individual, Columbia Falls, MT - #11999.72200)

Public Concern: The Forest Service should end timber harvest in roadless areas because private timberlands can adequately supply the nation's wood product needs.

"We also need to continue to find more national forest to protect, really, if the majority had its way, I am confident we would as a majority request no further cutting in our national forests. Please, put some thought into the health of this planet. We have enough tree plantations to gather our timber needs from. No more road construction or reconstruction or timber harvest in our roadless Forests!" (Individual, Cottage Grove, OR - #8479.10100)

The future of large-scale timbering has got to be tree-farming, on private land, in areas of faster growth – not in roadless areas of old-growth western public land. We should go ahead and admit that we've reached the end of the extractive regime on public lands out west. (Individual, Colorado Springs, CO - #854.93340)

Public Concern: The Forest Service should acknowledge that current timber harvest methods do not result in the destructive effects of past practices.

Our industry is paying for the sins of our fathers. We are not the only industry in this predicament; the salmon fishery in the northwest is hurting as well. While old time loggers cut down ancient trees even if they were too big for the local sawmill, the fish wheels harvested so many salmon that the odor in towns like Astoria was overwhelming. While we should learn from our mistakes (and we have) we should not be held accountable for actions we no longer practice that were standard operating procedure at that time. The roadless initiative is a means of saving the trees from the old time loggers who do not exist anymore. (Business/Business Association, Wallula, WA - #6512.10200)

Public Concern: The Forest Service should end logging in the national forests.

Please END LOGGING IN OUR NATIONAL FORESTS. Nationally, recreation generates nearly $40 to the economy for every dollar generated by logging, and creates 30 times as many jobs. Logging destroys recreation opportunities. Plus, rural communities rely on national forests for clean drinking water and logging can clog streams with silt and runoff. (Individual, Mobile, AL - #517.63000)

Please join the ranks of preventing cutting and never more 100% clear cuts such as in Washington State. (Individual, Sandy, UT - #893.63000)

END LOGGING IN THE PRESCOTT NATIONAL FOREST

As residents of Prescott, Arizona, we urge all cessation of logging on the Prescott National Forest as we have seen first hand the destructive results. You have recently introduced user fees for recreation and we have seen attractive improvements including user-friendly recreation facilities. The quality of our recreational experiences in the forest is diminished both by logging and cattle grazing and both are threats to our local water supply, marginal at best. Please protect this watershed and our quality of life. (Individual, Prescott, AZ - #17669.80000)

Public Concern: The Forest Service should assure the final rule restricts timber harvest to a much greater degree than in the Preferred Alternative.

I appreciate your efforts to create a roadless area policy for our national forests. I do think however that too much logging could take place in roadless areas--73% of the logging could continue in roadless areas is what I understand would be allowed under the 'preferred plan.' (Individual, Redmond, WA - #6273.0100)

The [Forest] Service suggests that protection will automatically follow a prohibition on road building because damaging activities will be too expensive or difficult without roads, but where there's a will, there's a way! With modern technology, it is possible to strip an entire mountainside bare without creating a road. (Individual, Seattle, WA - #10687.93330)

THE PREFERRED ALTERNATIVE DOES NOT MEET PRESIDENT CLINTON'S MANDATE

According to the DEIS on the roadless area protection policy, 1.1 billion board feet of timber is slated to be cut in roadless areas between 2000 and 2004. How can this be happening when, in October, President Clinton declared over 40 million acres of roadless forests protected from such destruction? (Individual, Tolovana Park, OR - #8171.93300)

Public Concern: The Forest Service should restrict timber harvest in roadless areas because past levels are clearly unsustainable.

Too much of north Idaho is too dependent on timber. The past and current forest management practices, on private, State, and federal lands, have not been following sustained yield principles. It is for this reason that the timber industry and their allies want to be allowed to road (and log) the remaining roadless areas. If future generations living in north Idaho are going to be able to continue to log the forests, they must log using sustained yield practices. Past mismanagement is not an excuse to open up new roadless areas to logging. (Individual, Coeur D'Alene, ID - #2121.93700)

The myth of sustainable logging practice is belied by the practice of continuing to cut [the] few remaining pristine forests. If logging is sustainable, then at what point will the logging companies be able to reharvest the areas they replanted and not have to cut new areas? This has not happened yet, and doesn't seem to be possible in the near future, does it? (Individual, Sebastopol, CA - #3192.93300)

The logging industries' devastating impact can easily be seen from the air while traveling across the Northwest. They have not provided the "stewardship of the land" that they have advertised when campaigning for more public forest access. Instead, they simply denude entire areas leaving the ground to erode and become unable to support new growth. (Individual, Arlington, VA - #4740.41710)

Unlike the local sawmill that has to depend on one area indefinitely for timber and consequently takes care not to harm the overall ecological sustainability of that area, Weyerhauser of Georgia-Pacific does not have the same attachment to the land. The areas on the National Forests that are open to logging are large enough that they can clear cut as much as they want in one place, and there will always be new area to move into when an old area is depleted….The results are the industrial wastelands and barren fields of stumps that mar our public forests….We don't need any more, especially in the most biologically diverse and wild areas of our National Forests: our roadless areas. (Environmental/Preservation Organization, No Address - #1826.80000)

Public Concern: The final rule should prohibit logging in roadless areas.

I would not support traditional timber harvests, something that is definitely not in congruence with roadless values of an enduring nature. Timber harvest, I believe, should be limited to those areas under Matrix of other

'flexible' forest uses such as some Adaptive Management Areas if these areas are not roadless areas themselves under consideration in this Proposed rule. (Individual, Corvallis, OR - #5157.93300)

Issue nationwide direction that immediately prohibits road building and logging in all national forest roadless areas. Prohibiting not just commercial logging but also any other removal of living OR DEAD trees from roadless areas. (Individual, Ashland, OR - #527.64140)

Alternative 2 (which I understand is the agency's choice) allows "intensive logging to continue." Unchecked--and it would be unchecked, considering past policy--such logging would continue to depredate the landscape far exceeding its boundaries. There is NO such thing as self-containment: "intensive logging" (clearcutting), impacts the environment endlessly, affecting our extremely valuable and un-renewable resources such as watersheds, and wildlife species. (Individual, Sonora, CA - #8280.93310)

BUFFER WILDERNESS AREAS

I went hiking in the Bull of the Woods Wilderness Area in the Mt. Hood N.F. last week and was appalled to see the destruction forest managers had visited on the surrounding lands. There were clearcuts on every hillside as far as the eye could see. While the wilderness area was a haven of wildlife and venerable old trees, the area around it was a veritable industrial wasteland. It is unconscionable what forest managers have done to that watershed, which drains into the Clackamas River, the home of more than one threatened or endangered salmon stock. There are signs posted in the area that inform visitors to the forest that they are entering a degraded watershed, yet the Forest Service insists on continuing the destruction. There are a number of timber sales in the watershed, the most egregious of which is the Eagle sale. This sale includes no new roads, yet would destroy a precious old growth forest that borders on the Salmon-Huckleberry Wilderness Area. The Eagle sale, which was pushed through under the salvage rider and is therefore not subject to litigation, is a prime example of why the Forest Service's roadless area plan needs to be substantially improved. Even though there will be no new roads, this roadless area will be destroyed. To make matters worse, the data they are using to justify this sale and others, many of which require additional roads, is not accurate. (Individual, Portland, OR - #6276.80000)

FOCUS ON SECOND-GROWTH STANDS IN ROADED AREAS TO MEET TIMBER HARVEST NEEDS

Use the parts of those national forests that have been already logged to establish areas for SUSTAINABLE TIMBER HARVESTS. (Individual, No Address - #405.93300)

This policy will really prove to have been wise if all of us who value the National Forests for economic reasons can begin to focus on those low altitude, already developed portions of the forests as the only logical sites for timber management. Local USFS managers should be directed to do all in their power to help citizens focus on such places, and not on the generally high, fragile and remote roadless areas. (Individual, Standard, CA - #7585.84100)

The Forest Service also needs to design timber sales, where it is appropriate, in the already roaded areas, not in roadless areas. (Environmental/Preservation Organization, Bonners Ferry, ID - #10182.64120)

Public Concern: The Forest Service should allow timber harvest in roadless areas because second growth in roaded areas will not be harvestable for decades.

Contrary to what some extremists are saying, there is not enough timber accessible via the existing road system to sustain the forest products industry. Our information is that most of the available timber is second growth trees that the Forest Service will not release for harvesting until 2090 and 2150. Other areas along the road system are in "no-harvest" zones for viewing and habitat preservation. (Individual, Anchorage, AK - #13485.93300)

Public Concern: The final rule should prohibit harvest of old growth forests.

I am an architect, and with the new composite building products, like truss joists and OSB board, we can use second growth forests for our building products and don't need to damage old growth forests. (Individual, Shingle Springs, CA - #3116.83610)

From the information I have on this area, I am aware that some of the old growth in this forest is used for pulp production, I think that using old growth forests for pulp production is a waste of resources, and at the very least I don't think the government should be subsidizing this in any way. (Individual, No Address - #1798.93300)

Stop all old growth logging. (Individual, Cottage Grove, OR - #1466.61300)

I am deeply concerned and alarmed over the potential loss of our pristine national forests. I had hoped that your new policy would protect our national forests. Allowing the use of virgin timberland to be logged and or have roads put through is not maintaining the protection of these areas. (Individual, Ruckersville, VA - #3375.83610)

Save all Ancient Forest in America (100 years or over). (Individual, Boise, ID - #13892.83610)

HALT LOGGING OF ANY STAND OF TREES 200 YEARS OR OLDER AND GREATER THAN 10 ACRES

Proposed solution: stop logging of any stand of trees 200 years or older greater than 10 acres as established where growing now as a base line to prevent further/later abuses of law and land. (Individual, The Dalles, OR - #7374.61300)

Public Concern: The Forest Service should preserve the remaining intact forests from harvest because replanted tree monocultures are an inadequate replacement.

The continuing practice of clearcutting and planting only pine trees in return is destroying our National Forests and Parks by eliminating native habitats and food sources for our wildlife. (Individual, No Address - #2171.83500)

A variety of forest growth patterns and woody species can support an array of wildlife, while protecting watersheds. Human development of land here is fast deteriorating terrestrial and aquatic wildlife habitat. And, much of the current forest is managed to promote the growth of a particular tree species. There is nothing natural about a red pine stand, planted row by row. My own research indicates such mono-culture stands provide little habitat for bird or plant species, nor do they draw crowds of tourists! (Individual, Eagle River, WI - #1583.83000)

I have seen national forests that were logged 40 years ago next to never-logged original old growth forest. Once the forest is logged, it essentially becomes an agricultural field under the supervision of the logging company. It is no longer wild forest. In Ketchikan, Alaska, in one area of the Tongass, there is a forest logged 40 years ago that is across a footpath from a patch of old growth forest. The logged land is devoid of diversity and life: it consists of a dense mat of same-age trees that were planted by the logging company. All trees are the same size; no light enters through this dense canopy, there is no understory of smaller plants, and almost no birds, mammals or other wildlife. In short, it bears more resemblance to a field of soybeans than a natural forest. In contrast, on the other side of the footpath is a never-logged original section of old growth forest. There are trees of all ages, open areas where large trees have fallen over and died, sunlight streaming in patches, abundant understory of ferns and other plants, and these wood are crackling with life: birds of many different species, small mammals, insects, etc. (Individual, Austin, TX - #2908.83000)

Public Concern: The final rule should not allow timber harvesting on the Tongass National Forest due to unacceptable impacts.

Only 4% OF THE TONGASS' 17 MILLION ACRES ARE OLD GROWTH. Of course, that 4% will continue to be logged if roadless protection is not designated in your plan.
SB (Federal Senate Bill) 600 would allow up to ½ million acres including Tongass old growth to be selected by the University of Alaska. All of this land would be clear cut. There are other pending bills to give them even more land to destroy. This land that is critical to fish and wildlife habitat. Only minimum protection is being offered while clear cutting takes place. Once the trees are gone, the wildlife will soon be gone too and we will have lost even more valuable natural resources from our own planet. (Individual, Anchorage, AK - #2730.83160)

There is no science showing how roading and logging the pristine islands of the Tongass could have any positive effect on the environment. (Individual, Chico, CA - #5176.80000)

RAINFORESTS, SUCH AS IN ALASKA, ONCE CUT WILL NOT RECOVER. NEVER. The environment is very delicately balanced, with the forest itself as the creator of climate. With the forest cut, the climate is gone, the system is destroyed. I am in favor of PRESERVING all rain forests. (Individual, Chatam, VA - #8136.83600)

Public Concern: The Forest Service should reassess the exception made in Alternative 3 for timber harvest for stewardship purposes.

Prohibition alternative 3 forbids not only road construction and reconstruction but also timber harvest, except if it is done "for stewardship purposes." More than 65% of current logging on national forests is justified as being needed for the protection of forest health against fire, insects, and disease, which would qualify as a "stewardship purpose." This is a dangerous loophole that makes the roadless areas legislation ineffective for the long-term. (Individual, Medford, MA - #1331.64130)

Public Concern: Alternative 3 should not allow an exception for the salvage removal of fallen and dead timber.

Alternative 3 falls short by allowing removal of fallen & dead timber. Wood decay and fire are natural processes that are important and necessary for the health of the forests. LET THE FIRES DO THEIR JOB!! (Individual, Salt Lake City, UT - #6753.84000)

Public Concern: The Forest Service should stop all logging projects being planned in roadless areas.

Stop all 90 new Roadless Areas logging projects being planned in Idaho. (Individual, Sun Valley, ID - #7983.93300)

Public Concern: The Forest Service should address whether additional timber harvest will occur after the year 2004.

On page 3-25, the FS states 73% of the planned logging in inventoried RA's will not occur if Alternative 2 is chosen. The FS only talks about timber harvest until 2004. What happens after this magic date? Why not say the FS commits to no timber harvest after 2004 or only a certain percent? We are suspicious the FS is planning additional timber harvests after 2004. (Environmental/Preservation Organization, Bellaire, TX - #13951.93300)

Public Concern: The Forest Service should discontinue giving Plum Creek Corporation timber credits.

Maintain some roads, cut salvage, quit giving Plum Cr. Co. timber credits. (Individual, Plains, MT - #1746.21500)

Public Concern: The Forest Service should continue active timber management on Forest System lands.

Forests are dynamic systems and should be actively managed to promote resilience against destructive agents, while providing a sustainable level of wood products and recreational opportunity. I am not advocating a return to clearcuts by any means, but light thinnings and periodic under burning facilitated by a well-designed transportation access system is the type of land stewardship that should be pursued, for the sake of long-term forest health and sustainability. (Individual, No Address - #6274.84100)

Allowing selective cutting in these areas could be a win-win policy. It reduces fuel build up. It helps regenerate the forest. It creates more diverse habitat for wildlife and for human viewing. It creates jobs and a more sound tax base. And, the fire lanes and trails that would be part of the management policy would provide easier access for visitors to our National Parks and National Forests. (Individual, INTL Falls, MN - #7084.93310)

I would prefer a more efficient management of our assets by the Forest Service. The commercial timber companies have better science and management procedures than our Forest Service. Rather than allow the continuing mismanagement of our valuable assets, I would prefer the management of our forests to be contracted to the commercial timber companies with oversight by the U.S. Government. (Individual, Idaho Falls, ID - #7108.93340)

A joint industry-government scheme should be developed to allow some road building and maintenance, harvesting of recently fallen trees, and cutting of mature growth. This would help revitalize the economy in areas depressed by government prohibitions on lumbering. It would further restore woodlands where fallen trees are infested by insects and overgrown to the extent that fires such as Yellowstone and Los Alamos, set by incompetents or not, are devastating. This necessitates a balanced and reasonable plan not one drafted by environmental extremists. (Individual, No Address, #5150.64420)

Public Concern: The Forest Service should allow roads for timber management within the National Forest System lands.

…we were in California after a devastating fire. A long time forest ranger told us that trees are going to leave the forest one of two ways: 1- on a log truck, or 2- in smoke.
My question to you as public servants is which method serves society and the environment the best??? You and I both know that planned harvest is MUCH MUCH MUCH better than the total devastation left by fire.
Without roads you basically leave affordable timber harvest out of the picture.
If you are planning to destroy established roads, you create more erosion than the roads cause except for some very steep areas.
If part of your bottom line is to save salmon, please check with the scientists at Oregon State University. It is my understanding that up to 80% of the demise of salmon is due to ocean conditions!
Roads are essential for wise and credible management of our forests both for wildlife & humans. (State Elected Official or Staff, Halsey, OR - #6917.93300)

I would like to share with you the reasons that I feel the proposed roadless area rule is not good for our nation: It means that the only types of logging and forest management must be done by more expensive types of logging like line machine logging or Helicopter logging.

It inhibits new inventive types of harvesting techniques available today. (Individual, Marion, MT - #6315.93300)

Public Concern: The Forest Service should not adopt the proposed rule inasmuch as it is just an excuse for the fact that national forests have failed to meet their own set targets for timber production within existing forest plans.

Over the past few weeks, comments by Forest Service personnel locally reported that this proposal was no change from the current "status quo" management of the Bitterroot National Forest. This is not a justification of this initiative, but an excuse. The Bitterroot, like most all other forests within Region One have failed miserably to meet their own set targets for timber production within the existing Forest Plans. (Business/Business Association, Hamilton, MT - #7251.93300)

Public Concern: The Forest Service should not set aside any matrix forest as unroaded under the proposed rule.

Another item of importance is the issue of the matrix forest and the reduction of suitable land for timber production. I do not believe any matrix forest should be declared or set-aside as unroaded, under this DEIS. (Individual, Arcata, CA - #1396.93100)

Because of the significant changes in management and use of the National Forest lands brought about by the recent implementation of the Northwest Forest Plan, there should be no net loss of matrix designated lands under this Draft EIS. If there are matrix lands within the Inventoried Roadless Areas (IRA) on the Rogue River National Forest, an area outside of the IRA's of equal size and value should be added back to the management base of the forest. (Timber Company or Association, Medford, OR - #13658.72500)

Public Concern: The Forest Service should keep its promise to Minnesota residents regarding timber cutting outside the Boundary Waters Canoe Area.

I particularly object to designating roadless areas in the Chippewa and Superior National Forest. Upon the passage of the 1978 BWCA bill, my constituents in Minnesota were promised that timber cutting would not be restricted outside the BWCA. These promises are now being broken. (State Elected Official, Tower, MN - #82.42000)

6.3.2 Silvicultural Methods

While many debate whether an alternative that restricts commercial timber harvest should be selected as the final rule, others narrow their focus to address the appropriateness of various methods used for timber harvest. Several respondents feel the Forest Service should mandate the use of better management practices. For example, many feel that the Forest Service should reevaluate harvesting practices, such as slash management. Numerous opponents of timber harvest oppose the continued use of clearcutting. Many request that the Forest Service should use alternative timber removal technologies that minimize environmental damage, such as winter harvest over snow and old-fashioned horse logging. One elected official from Oregon would like the Forest Service to address the effective range of harvester/forwarders in the Final EIS. The proposed rule should protect areas from the

creation of skid trails by forwarders and other mechanical harvesting equipment, advice some individuals who feel that the proposed rule is not restrictive enough.

If roadbuilding is prohibited, then helicopter logging should be allowed, say many people. "To the extent that the final rule may restrict forest roads, USDA Forest Service should provide incentives for using helicopters to harvest and extract logs in the most environmentally friendly manner," writes one helicopter service. According to one individual, that means harvesting only dead or diseased trees. According to many others, however, the Forest Service should not allow helicopter or cable logging because of negative impacts on flora, fauna, and fire hazard in roadless areas. "I feel that all roadless areas should prohibit logging of all kinds. If they can't build roads, they will only be able to use very expensive methods such as helicopters, which make only the biggest, oldest trees worth logging. This is NOT a good way to protect old growth in our national forests," remarks one concerned citizen.

One writer suggests that the final rule should clearly state that if the trees can't be replaced within 25 to 30 years, then they should not be cut or considered a legitimate harvest. Another requests that the Forest Service require timber contactors to replant twice the harvested acreage, and several respondents propose that the Forest Service require reforesting be carried out with more than one species of tree to avoid unhealthy second growth monocultures.

Public Concern: The Forest Service should mandate the use of better management practices for timber harvest.

Loggers need to clean up THEIR act: utilize more selective cutting methods; insure les intrusive use of machinery; and leave logged areas more aesthetically pleasing. (Individual, International Falls, MN - #7084.93300)

IMPROVE SLASH MANAGEMENT

I think it is time for the USFS to fully evaluate harvesting practices on public lands such as slash management. Unmitigated slash piles do not readily return nutrients to the soils and present a constant fire hazard, especially in times of drought. (Individual, Fort Collins, CO - #358.93300)

Public Concern: The Forest Service prohibit clearcutting.

I do not oppose limited road access to National Forests; and I support controlled commercial use of forest lands. However, if clear-cutting is the Forest Service's only approach to logging, I support its ban. Clear cutting is such an eyesore, and leaving a 50' strip uncut next to streams is ineffective for erosion control. Logging should be selective (not just the largest trees, either) and all slash removed. If that is uneconomical, then don't log. (Individual, No Address - #13256.93300)

I must say that I am against any more Clearcuts being allowed in our forests. (Individual, Wallace, ID - #7140.93300)

I believe that relatively few parcels of USFS land support clear cutting practices. I realize this is by far the most economical way to harvest since it allows the highest degree of mechanization but it also does the greatest harm

to forest dwellers, soils, and understory and results in more homogeneous forests, which are typically more sterile in terms of biodiversity. (Individual, Fort Collins, CO - #358.93300)

Public Concern: The Forest Service should use alternative timber removal methods to minimize environmental damage.

LOG OVER SNOW

"Timber harvest has been accomplished in recreation areas when the areas are covered with snow and the results have been removing excess fuel and hazards without damaging the area to any great degree (Trinity Lark NRA). Even the California Department of Parks and Recreation did winter logging in the Tahoe Basin to reduce the fuel loading and remove the bug ravaged trees." (Individual, Chico, CA - #10596.21300)

LOG WITH HORSES

Where selective cutting has to be done require that it be done with horses so as not to harm the eco-system. (Individual, Canterbury, CT - #4092.64150)

Why not utilize teamsters who work horses/oxen--in some cases. This combination has proven very successful, limiting, if not eliminating the need for roads. They can efficiently enter and exit forests when timbering, with minimal scarring of land. This certainly beats the perpetual pools of skidder oils and fluids one cannot help but notice when walking one of these roads. (Individual, No Address - #13399.93300)

Public Concern: The Forest Service should address the effective range of harvester/forwarders.

At what distances from the nearest road are harvester/forwarders effective, and at what steepness of ground? A helpful source for further discussion of this issue in the Final EIS is the…Blue Mountains study. (State Elected Official, Salem, OR - #18661.93330)

Public Concern: The proposed rule should protect areas from the creation of skid trails by forwarders and other mechanical harvesting equipment.

We are also concerned as to the failure to analyze the consequences of allowing logging within roadless areas. Equipment exists and logging methods are used which do not use roads, such as forwarders and cable yarders. Instead, the logging machines simply mow down trees standing in its path as the machine reverses out of the area it extracts the mown down trees. Technically, no road has been built, but in reality the area is fragmented and suffers the same consequences as if a road had been built by the Forest Service. According to the glossary provided with the Draft EIS, the term "road" is mutually exclusive of the term "skid road." Nothing in the draft proposal protects these areas from skid trails. (Environmental/Preservation Organization, Plymouth, MN - #15909.32000)

Public Concern: Helicopter logging should be allowed.

One proposal is to completely stop logging activities in roadless areas. I'm concerned that this may not provide adequate fire protection. Perhaps you should revise the proposal to allow logging with helicopters. (Individual, Pueblo West, CO - #2175.84200)

HELICOPTERS USUALLY PROVIDE THE MOST ENVIRONMENTALLY COMPATIBLE AND COST EFFECTIVE MEANS OF ACHIEVING MANY USDA MISSIONS. To the extent that the final rule may

restrict forest roads, USDA Forest Service should provide incentives for using helicopters to harvest and extract logs in the most environmentally friendly manner. (Business/Business Association, Alexandria, VA - #29960.93330)

ONLY WHERE SCIENTIFICALLY SUPPORTED FOR HARVEST OF DEAD OR DISEASED TREES

I think your proposed rules should go a little farther. Selective non-impact logging (i.e. helicopter) should be allowed but only [for] dead dying diseased deformed tree species. And where true science can assure no negative impact on ecosystem species or habitat terrain. (Individual, Cusick, WA - #6764.93320)

Public Concern: The Forest Service should not allow helicopter or cable logging because of negative impacts on flora, fauna, and fire hazard in roadless areas.

It is not enough to just prohibit roads. Helicopter logging is more devastating for a number of reasons:
1. Logging slash is left on site (too costly to get workers there) and accumulates in "jackpots" which are highly flammable. Heli-logging slash is implicated in many of the West's "blow-ups."
2. The economics are bad--costs are high--and so planners just mark the "pumpkins"--the biggest trees--or plan clearcuts to save costs.
3. Invasive non-active plants are spread by helicopters. Helicopters travel widely around the West and are not regularly steam cleaned prior to movement.
4. Heli-logging opens the forest to drying sun and wind, thereby increasing fire risk. (Individual, Etna, CA - #12933.93330)

How is it possible that a National Forest, which is roadless, is being destroyed by logging companies? This makes no sense to me at all!! We need to include laws in this new bill that prohibit ALL logging and mining companies from destroying these forests. Their helicopter logging destroys acres of land every day in roadless forests along with leaving piles of slash that dry out and serve as tinder for forest fires and a breeding ground for beetles. Then there is cable logging which can move over 100,000 board-feet a day in timber and is done on steep slopes which then cause erosion and landslides. Along with having devastating impacts on streams and fisheries. (Individual, Madison, WI - #6899.80000)

Many creatures that need old growth forest and/or large uninterrupted forest (fisher, lynx, wolverine, etc.) are in decline. Commercial logging via cable, helicopter or any other means would destroy the last place that these animals can survive. (Individual, Bend, OR - #6725.83500)

From what I have observed, aerial methods of timber removal, i.e., helicopter and aerial cable, results in increased concentrations of ground fuels that increase fire potential. Slash from these timber cutting methods have historically been left untreated. If such logging methods are allowed in roadless areas in the future, it can be expected as slash will undoubtedly be untreated and allowed to accumulate. This, of course, is a very undesirable situation. (Individual, Driggs, ID - #6846.84100)

I feel that all roadless areas should prohibit logging of all kinds. If they can't build roads, they will only be able to use very expensive methods such as helicopters, which make only the biggest, oldest trees worth logging. This is NOT a good way to protect old growth in our national forests. (Individual, Asheville, NC - #612.93300)

Public Concern: The rule should clearly state that if the trees can't be replaced within 25 to 30 years maximum, then they should not be cut or considered a legitimate harvest.

It's time to stop the rape and destruction of our environment. These forests, so-called 'public domain' have been referred to time and again as renewable crops. That is patently ludicrous. The law should be clear that if the

trees can't be replaced within 25 to 30 years maximum, then it should not be cut; should not be considered a legitimate harvest. Our public domain is all that is left of our inheritance and rightly belongs to the earth itself and to our natural ecology of which human beings are only a part, albeit an incredibly unwise and destructive part. You are the one who stands in the breach and can call a halt to the senseless and greedy destruction of so many years standing. (Individual, Portland, OR - #4676.93300)

Public Concern: The Forest Service should require that timber contactors replant twice the harvested acreage.

A suggested solution: For every acre harvested the harvester must replant the area forested and plant another acre on public or private land. (Individual, Solidew, WY - #3509.84600)

Public Concern: Reforesting should be carried out with more than one species of tree.

…I see some of the terrible effects of poor stewardship; for instance, timber companies "reforesting" areas with one kind of tree only which leaves a very strange environment of straggly, unhealthy trees which even the birds seem to avoid. (Individual, Ashland, OR - #5434.93300)

…plant more diversity of trees instead of monoculture that causes so many problems. (Individual, Charlotte, NC - #6833.93340)

I come from the Upper Peninsula of Michigan where logging and mining were a way of life. Now city streets are falling in, they are importing wild life and it's not working, they promised to replace the trees and did some of that with scrub pines that blow over in the wind. (Individual, Virginia Beach, VA - #3160.8000)

6.3.3 Adequacy of Analysis

Those who question the adequacy of analysis and information presented in the Draft EIS represent all points of view. Many request that the Final EIS include more in-depth information regarding current and projected timber harvest statistics. One timber company requests the Forest Service explain how timber management alters the characteristics of a "roadless area." Some request that the Forest Service disclose the likely effects of the proposed rule on the mix of stewardship and commodity timber harvesting. One environmental organization disagrees with conclusions stated in the Draft EIS that are based on its data, and requests that the Final EIS include an analysis of logging levels by volume and elevation classes to present a more appropriately scaled analysis of the potential benefits of including the Tongass National Forest. "While we provided many of the databases on protected areas for the DEIS analysis as cited in the DEIS (DellaSala et al. 2000, in review), we disagree strongly with the statement that 'while so much of Alaska is already protected, the actual benefits to biodiversity are proportionately much less than in other states (3-62),'" protests this organization.

Many stakeholders would like the Forest Service to provide site-specific information about the effects of the rule on timber harvest levels of specific forests. Some feel that the Forest Service should correct claims of decreased clearcutting on the national forests in the Draft EIS by including the amount of all even-aged harvest methods. One individual questions the

legality of increased timber harvest unit expansions in the Tongass without NEPA analysis. The Forest Service should provide updated project level timber harvesting information, request both timber companies and environmental organizations. "Forests should be requested to provide additional information about scheduled projects, and in the Final EIS some evaluation of the reliability of the data for projects should be included," remarks one organization. Many elected officials, environmental groups and individuals request that the Forest Service conduct a quantitative analysis of suitable timber base in roadless areas and better evaluate the effects of the rule on timber sale volumes. Finally, some would like the same analysis for the effects of the proposed rule on allowable sale quantities and timber suitability outside of roadless areas.

Public Concern: The Forest Service should explain how timber management alters the character of a roadless area.

Does timber management, in and of itself, alter the character of a "roadless area"? If so, how? (Timber Company or Association, Rapid City, SD - #15900.93300)

Public Concern: The Forest Service should disclose the effects of the proposed rule on the mix of stewardship and commodity timber harvesting.

Page 3-115, Alternative 2, 2nd paragraph--This discussion states that the effects on the mix of stewardship and commodity purpose timber harvest is unknown. Why? With the resources the agency has to prepare this document, its Natural Resource Agenda, and all the scientific knowledge it alleges to have, it is inconceivable that the agency cannot determine the effects on the environment, communities, social factors, and harvest levels. If the Forest Service cannot determine these effects, it cannot make an informed decision of this magnitude and scope. Can you somehow disclose the mix of stewardship and commodity harvest? Our local communities and businesses cannot plan a future without knowledge of the effects that this Federal decision will have on them. (County Elected Officials, Dillon, MT - #17297.93100)

Public Concern: The Final EIS should include an analysis of logging levels by volume and elevation classes to present a more appropriately scaled analysis of the potential benefits of including the Tongass National Forest.

The Tongass National Forest in southeast Alaska has been recognized by World Wildlife Fund as an area of global conservation significance. Roughly 1/4 of the world's temperate rainforests occur in this region, including many of the nation's largest intact watersheds and low-elevation forests (DellaSalla et al. 1996). Despite its global and national significance, however, up to 90% of low-elevation, high volume old-growth has been logged on the Tongass since the early 1950s (DellaSala et al. 1996). BECAUSE LOW-ELEVATION, HIGH VOLUME OLD-GROWTH FORESTS ARE OF HIGH CONSERVATION VALUE, WE REQUEST THAT THE FEIS INCLUDE AN ANALYSIS OF LOGGING LEVELS BY VOLUME AND ELEVATION CLASSES AND HOW THE PREFERRED ALTERNATIVE WILL IMPACT ROADLESS AREAS IN THESE IMPORTANT FOREST TYPES THROUGH ROAD BUILDING AND LOGGING ACTIVITIES ACROSS ALTERNATIVES. While we provided many of the databases on protected areas for the DEIS analysis as cited in the DEIS (DellaSala et al. 2000, in review), we disagree strongly with the statement that "while so much of Alaska is already protected, the actual benefits to biodiversity are proportionately much less than in other states (3-62)." The DEIS undervalues the need for additional protection to roadless areas on the Tongass for the following reasons: Levels of protection for Alaska are based on percentage estimates only applied at the scale of the entire ecoregion and do not include representation assessments (e.g., GAP analysis)

that are specifically designed to identify gaps in protected areas within the ecoregion. Most protected areas in southeast Alaska, fail to capture low-elevation, high volume old-growth forest, under-representing this important habitat type. Because of the Tongass National Forest's ranking as "globally outstanding," losses to biodiversity values have far greater impacts than in areas of lower biodiversity significance.

The Tongass National Forest contains a large proportion of the nation's last intact forests that are vital for maintaining viable populations of many species that are in trouble elsewhere across their range. Because of its vastness, the Tongass is especially important in maintaining large-scale ecosystem services such as carbon sequestration and amelioration of global climate change. The Tongass is perhaps the last place in North America where opportunities still exist to combine representation approaches related to the location and importance of protected areas (i.e., particularly through roadless conservation) with more sustainable timber harvest levels (i.e., by limiting harvest to a 1/4 - 1/2 mile buffer around existing roads). Because the Tongass is a humid (i.e., temperate rainforest) environment with high stream densities, reduction in roads is especially beneficial to fish and watershed values particularly since such areas would require the greatest drainage structures to build roads (p. 3-25). (Environmental/Preservation Organization, Ashland, OR - #13522.83422)

Public Concern: The Forest Service should address the effects on timber harvest levels of specific forests.

Will impacts on timber harvest on the Caribou be at a higher percent than those percentages shown in the slide show? (Individual, Pocatello, ID - #2959.93300)

The significant impact to Beaverhead County as a result of a "Recreation Management Test" conducted in 1992 and the continued emphasis placed on recreation in this county has never been addressed. (County Elected Official, Dillon, MT - #17297.91000)

Public Concern: The Forest Service should correct claims of decreased clearcutting in the Draft EIS by including the amount of all even-aged harvest methods.

On page 3-11, we dispute the decrease in clear cutting acres the FS says has occurred. Seed tree, shelter wood, salvage, and SPB logging are clear cuts by other names. (Environmental/Preservation Organization, Bellaire, TX - #13951.31100)

FS uses the wrong words to describe patch clear cutting. The FS calls it group selection but group selection is not several acres to 5 acres in size. This is the size of patch clear cutting. Group selection should be no larger than 1/4 acre and in most instances is just a fraction of an acre. The FS has corrupted the term group selection for its own even age, clear cutting preference. (Environmental/Preservation Organization, Bellaire, TX - #13951.31100)

Public Concern: The Forest Service should address the expansion of timber harvest units to increase volume output in the Tongass and whether an EIS must be completed for this.

Now I don't really want to stop logging, but I have a real problem with the management that's been done on the Tongass so far with it being high graded and also unit expansion where they go in and they expand a unit because it didn't get enough volume out of it. But where they expanded it, was that ever under any kind of EIS? I think that's illegal. (Individual, Ketchikan, AK - #23863.93300)

Public Concern: The Forest Service should provide current baseline timber harvesting information.

The DEIS shows Forest Service has substantially reduced its plans to enter roadless areas to conduct projects. The No Action alternative in the roadless policy DEIS outlines fairly limited activities in the next five years for road construction and timber harvest. However, the DEIS probably overstates the likely activities because many Forests have not revised their five-year projections for projects and supplied old projections in response to the request for information. Forests should be requested to provide additional information about scheduled projects, and in the final EIS some evaluation of the reliability of the data for projects should be included. (Environmental/Preservation Organization, No Address - #15883.90010)

ALTERNATIVE ONE - No Prohibition, which we support, should have portrayed Forest Plan outputs not output average for years 1997, 98, and 99. To select outputs from this time period, when the entire National Forest System was in gridlock, and harvest activities delayed by appeal, litigation, budgetary constraints, and administration tampering, was idiotic, arbitrary, and capricious. If this defect is not corrected in the final E.I.S., a decision will never see the light of day. Clearly, timber outputs from this period were selected because by comparison they would show little difference from projections made by the proposed alternative, and biased the entire comparison. It was strange that this comparison of outputs was made in the draft, while projections of roadless area road building in the summary document "Roadless Areas Conservation" was based on Forest Plan projections. The document authors seemed willing to mix apples and oranges to fit their agendas. (Timber Company or Association, Kamiah, ID - #43488.90010)

The document refers to the impact of timber volume reduction by using two misleading figures. The misrepresentation of using the baseline harvest data of 1996-98, mentioned above, definitely skew the analysis. The harvest level of 1996-98 is far below the average harvest level of the previous decade and thereby misrepresents the overall reduction due to the proposed regulation. The other significant misrepresentation is the failure to compare the amount planned for harvest in relations to the increment or volume grown each year. The National Forests have been cautious in proposing any timber sales in areas previously categorized as inventoried roadless areas.
Because of the present administration policy, most forests have a 5 year plan to cut much less timber than could be cut (identified in the Allowable Sale Quantity or ASQ) and in fact, has been cut in the past. So any analysis of impact using the current 5 year planned sales is much below the actual impact of the Alternatives 2 through 4. (State Elected Official, Salt Lake City, UT - #43918.90010)

The no action alternative's baseline for timber production addresses too short a time period. The baseline should be based on the current forest plan. (Local Community Organization, Carmen, ID - #8039.61100)

Public Concern: The Forest Service should conduct a quantitative analysis of suitable timber base in roadless areas and effects of the rule on timber sale volumes.

The analysis does not address suitable acres and ASQ. Changes in where road building is allowed will make some lands currently classified as suitable for timber harvest unsuitable. Under 36 CFR 219.14 the Forest Service has to make this determination. The change in the suitable land base will affect the ASQ. For example, if the ASQ was 25 mmbf from the entire national forest including areas that are currently roadless, it will likely be impossible to meet that ASQ for two reasons. First, much of the timber that was in the roadless area will largely not be accessible or economical, not to mention if the Forest Service chooses an alternative that bans timber harvest. Secondly, the Forest Service will probably not be able to make up the missing timber from roaded lands either due to environmental or other reasons. A decision to ban road construction in roadless areas necessitates a forest plan amendment at a minimum to adjust ASQ. This is not discussed in the DEIS. The Forest Service needs to conduct an analysis of the standing inventory of timber. The analysis in the DEIS is based on "planned" volume. The two are dramatically different. (Timber Association, No Address - #52501.93300)

That you include an honest assessment of the effects of the proposed alternatives on the moderate timber harvesting from the national forests. The DEIS states on page 3-188 that quantified effects on timber harvest only look forward to the next five years of a planned offer. Since the chief has placed a moratorium on sales in roadless areas, it's not too surprising that this doesn't show the big effect on timber sales volumes. So what I want the Forest Service to do in the FEIS is, one, show the number of suitable acres that are in the roadless areas and, two, project the long-term effect on the timber harvest. (Individual, No Address - #22065.70000)

The effect of prohibiting roadless area timber sales on the timber industry and employment would be minimal. Forgoing the entire 220 million board feet of annual timber sale offering in roadless areas over the next five years would result in only 7% reduction in the Forest Service's planned timber sale program. The impact on total U.S. timber production, which averages about 83 billion board feet per year, would be miniscule – about ¼ of 1%. Similarly, the DEIS estimates that a prohibition on roadless area logging would theoretically result in a loss of just 820 timber jobs, which is 3% of all National Forest-based direct timber jobs and less than one-tenth of 1% of all U.S. wood products employment. (Environmental/Preservation Organization, Eugene, OR - #55101.93710)

Page 3-112, second paragraph--A very important element missing from the analysis is a discussion of the suitable lands that will be affected by the "Action Alternatives." Although "capability" is discussed, e.g., the 20 cubic feet per acre threshold, "suitability" is not discussed. Each Forest Plan in the nation based its Allowable Sale Quantity (ASQ) on the amount of suitable lands available for timber harvest. This involved many factors that included capability, access, spatial distribution, growth rates, logging feasibility and other variables. Effectively removing acres from the suitable timber base due to lack of road access can significantly affect the timber management programs on individual Forests by concentrating harvest on those areas that have been previously roaded and logged.
RELIEF: The Forest Service must evaluate and disclose how "timber suitability" will be affected. Although timber suitability is not addressed as a factor in the proposed revised planning regulations, they have not been finalized and do not apply to this analysis. (County Elected Officials, Basin, WY - #43980.93100)

Forest Plan, an annual timber harvest volume from the Rogue River Under the Northwest National Forest is scheduled to be 26 million board feet. In Fiscal Year (FY) 1999, the harvest on the Rogue River National Forest amounted to 8.1 million board feet. In Fiscal Year 2000 to date, the amount of timber sold is just 300,000 board feet. If 81,417 acres of Inventoried Roadless Areas are removed from active multiple-use management as proposed in the Draft EIS, how will the Rogue River National Forest meet its goal under the NWFP in the future? (Timber Company or Association, Medford, OR - #13658.72230)

Public Concern: The Forest Service should address the effects of the proposed rule on allowable sale quantities and timber suitability outside of roadless areas.

Comment: Page 116, last paragraph--The Cumulative Effects section must include a discussion of the effects on the suitable timber base and to Allowable Sale Quantity outside of roadless areas. There also needs to be a disclosure on the cumulative effect that could occur on state and privately owned timber lands as a result of implementing the "Action Alternatives." CEQ Regulations (1502.16) are very clear that the analysis will include discussions of "possible conflicts between the "Proposed Action" and objectives of Federal, regional, State, and local land use plans, policies and controls for the area concerned." This discussion is totally lacking. Relief: The Forest Service must disclose the effects of the "Proposed Action" on ASQ and timber suitability outside of roadless areas. (County Elected Official, Worland, WY - 16185.71100)

6.3.4 Timber Harvest, Stewardship, and Forest Health

Overall, there appears to be more support among the general public for timber harvest activities if they are denoted forest health, fire hazard reduction, or stewardship projects.

Many people fear that the proposed rule will significantly limit the ability of Forest Service land managers to effectively access roadless areas to undertake forest management activities. Those in favor of extensive timber harvest often express the opinion that a dead tree is a wasted tree, and so timber should be harvested rather than left to burn or be destroyed by insects and disease. "Just recently, the so-called 'controlled burn' near Los Alamos wasted about $110 million (wholesale) worth of lumber. Why don't you allow the logging companies to cut the wood that you intend on burning? It would have saved an enormous amount of lumber, saved the government a lot of embarrassment, not to mention, saving Los Alamos!" concludes one advocate of active management. Allow road building for stewardship harvest, people plea, and use management practices to remove or thin trees and fuel before fire occurs. Others feel that timber harvest for fuel reduction should only occur in urban interface areas where fires may threaten towns or homes. Natural processes, such as fire, many claim, are far more destructive than logging. On the other hand, many others feel that the existing road system already provides sufficient access for management activities.

Others distinguish between stewardship harvest and ecosystem restoration. One professional society calls for the Forest Service to clearly define what the agency means by restoration forestry and to determine the most appropriate lands for experimental treatment, in consultation with independent scientists. Many feel that the final rule should permit stewardship timber harvest only to restore natural forest structure and composition, and not simply to get the cut out under another name. "The issue of 'forest health' is one that has been developed by the wood products industry and perpetuated by the congressional delegations of the western states to justify continued timber development, even in areas in which logging activities are economically unsupportable. The Forest Service's own research, which has been validated by the General Accounting Office, indicates that previously logged areas are at greater risk for catastrophic fire than undisturbed forests," submits one Montana resident. Many others express similar opinions, and call for the Forest Service to prohibit all timber removal in roadless areas.

The Forest Service should establish specific criteria to identify forest health conditions that would require entry into roadless areas, recommend others. In order to assure that stewardship harvest is not simply commercial harvest under a different name, some request that the Forest Service set clear guidelines to allow thinning in roadless areas only up to a specific maximum diameter of tree that will be removed, one individual suggesting a diameter of eight inches. Accordingly, many individuals and organizations contest the claim made in the Draft EIS that Alternative 3 will have fewer local negative effects than Alternative 4 due to benefits from stewardship timber harvest, and request that the agency reevaluate and scientifically justify this position.

Among those who advocate carefully managed stewardship harvest, some propose that the Forest Service award experimental contracts for stewardship timber harvest and contract any commercially valuable timber separately. "[R]estoration and stewardship contracts for roadless areas [should] be awarded to firms and organizations with professional experience and track records of competence in forest, fire, and restoration ecology," they counsel. In addition, some individuals propose that "separation of the economic harvest incentive from stewardship objectives" by separating the source of funding for each of these will better meet

stewardship objectives. Still others believe that most, if not all, timber manipulation is unnecessary and potentially harmful in roadless areas. These wild forest advocates call for the Forest Service to allow natural processes to predominate in roadless areas. "I find it incredibly curious that extensive blowdowns occurred throughout the forest's history, and wild fires have occurred repeatedly, yet, without the infinite wisdom of professional managers, the forest was lush and green and beautiful when the first white men journeyed through the area. A part of the problem is that most of us live with very short-term expectations. We expect the entirety of history to be encapsulated within our life spans. That is just not the way the natural universe operates, especially wilderness," observes a Minnesota resident. Accordingly, many who hold this view of the natural world believe that the Forest Service should prohibit all salvage timber harvest, noting both that the dead and decaying trees provide critical habitat and play a vital role in forest ecosystems, and that forests evolved with periodic catastrophic disturbance. Others dispute this position, and feel that salvage harvest aids in the recovery of extensively damaged forests.

Public Concern: The Forest Service should consider whether the proposed rule will restrict effective access for forest management activities.

I feel you are tying the hands of the professional land manager. (Individual, No Address - #850.10211)

The Forest Service does a poor job of maintaining existing roads. I suppose you are trying to reduce potential costs in the future. You are also eliminating your own access for management, fire fighting and other needs. (Individual, No Address - #1155.10211)

As a former Forest Service Employee I know the importance of land vehicle access to effectively administering and monitoring forests and forest users. This is especially true during fire season where quick and adequate response means saving resources both forest and financial. In my experience, road access was critical to the effective performance of my Forest Service duties. (Individual, Boise, ID - #8101.71300)

WE ARE TERRIFIED THAT THE FEDERAL GOVERNMENT IS ABOUT TO DO THE WRONG THING TO PROTECT OUR FORESTS. The Forest Service is clearly trying to diffuse the conflict they have created with this roadless initiative by hiding the ball. The DEIS may say that logging will not be prohibited in roadless areas, however they have prohibited the most effective tool foresters have to treat the serious forest health problems that exist in our forests. That's like taking away a surgeon's most efficient instrument--without it the patient may die. That's what we're afraid of--we're watching our forests die every day. (Individual, Salem, OR - #7386.84100)

If you prohibit reconstruction of roads, erosion will eventually close them all, creating areas that no one can get to. It will hamper fire-fighting efforts in case of a fire. Everyone who loves the outdoors will lose. The only ones to gain are the so-called environmental groups. It will boost their propaganda machine, so they can get more money and bring more lawsuits against the Forest Service and other land managers. (Individual, Snowflake, AZ - #6892.413000)

President Clinton's proposal could also ban important forest health resource management programs that are so vital to protect our lands from being destroyed by catastrophic wildfires and insect infestations. (Individual, Westminster, CO #115.84000)

The Forest Service must be careful with statements such as "potential positive effects are expected for fire management, insect and disease management, noxious weed control, water and air quality, wildlife and fish values, and passive use values" when referring to not entering roadless areas. There are significant tradeoffs for all of these categories between roaded areas and unroaded areas. While human-caused fire ignitions may

decrease with fewer roads, lack of access to wildfires will hamper suppression efforts. While fewer roads may slow the spread of noxious weeds, forest health and insect and disease infestations may not be treated due to lack of road access. Fish habitat may benefit from fewer roads, but some fish habitat in dire need of active restoration may not occur with the lack of management access. The Agency should not use value-laden statements without a thorough analysis of tradeoffs—an analysis not found in DEIS. A proposal as sweeping as the roadless area proposal will limit future management options. There is little evidence that the Forest Service has truly done any analysis to consider the long-term implications of such a proposal. (Timber Association, No Address - #52501.93300)

Public Concern: The Forest Service should permit timber harvest in roadless areas for forest health.

I want it written in the plan that: LOGGING CAN BE DONE IN THESE AREAS. This will continue forest health and control wildfires that Roadless/Wilderness areas will have. (Individual, Vonore, TN - #5713.93300)

TIMBER SHOULD BE HARVESTED RATHER THAN LEFT TO BURN OR BE DESTROYED BY INSECTS AND DISEASE

Just recently, the so-called 'controlled burn' near Los Alamos wasted about $110 million (wholesale) worth of lumber. Why don't you allow the logging companies to cut the wood that you intend on burning? IT would have saved an enormous amount of lumber, saved the government a lot of embarrassment, not to mention, saving Los Alamos! (Individual, Woodland Hills, CA - #1001.93300)

The forest is already suffering from your timber policy. Miles of dead and dying trees are going to waste. (Individual, Boise, ID - #75.93310)

In retrospect of the New Mexico fires, I would suggest it would be far better to have been able to harvest at least some of these forests than have them converted to air pollution. (Individual, Bozeman, MT - #320.83310)

In the era of the 1930s, total wildlands fire suppression worked for a while. However, the accumulation of dense growth on the forest floor enhanced the spread of disease and the catastrophic fires that ensued… Additionally this unmanageable underbrush sucked up precious water that could more appropriately be used for other purposes. The Forest Service's stance should be to encourage lumbering interests to salvage as much of the products from the forest as is possible in burned over areas as well as selective logging of existing trees that have passed their peak of growth, to stimulate younger, disease-free trees to take their place. This stance will aid our national forests to recover. (Individual, Big Sur, CA - #1045.84000)

I am wondering why it is still impossible for federal timber that has been killed or injured to such a state, cannot get to market before it is eaten by bugs or stained by fungus. Private property harvest occurs at no loss of value to the owner. This is a disgrace and Congress and the Forest service and maybe the OMB are to blame for the loss of value. I know that Congressman Herger had been fighting to keep this waste from occurring. These are dollars that could be used to maintain the facilities including roads. Forest managers need to be able to get the job done in a timely manner so the public can realize the value of the product. The funds can go to reforesting and managing the roads and trails. (Individual, Chico, CA - #10596.93300)

ALLOW ROAD BUILDING FOR STEWARDSHIP HARVEST

The roadless plan will make it very hard for the timber industry to go in and cut the trees to thin them. Thinning the forests is a large part of the health of the forests. One of the primary problems with the forests now is that they are too thick and trees that are too close together, hence they need to be thinned. I'm not talking about clear cutting. That would be insane. I'm talking about cutting a single tree and leaving the tree next to it and then cutting the next tree and leaving the next tree that is beside that one etc. This will allow the soil nutrients and water to be properly allocated and distributed to the trees lowering the fire danger and improving the general health of the trees enormously. You can't thin cut if you can't get your equipment to the forest with a complex network of roads. (Individual, Grand Junction, OR - #6380.93310)

"A managed forest is a healthy forest". This slogan illustrated that to control insect & disease infestations we should occasionally do improvement thinning, or other proven forestry activities so that the trees maintain vigorous growth. This can only be done with a network of roads. (Individual, Augusta, GA - #13666.84100)

The Chugach National Forest is presently suffering from a pandemic of spruce bark beetles which has devastated more that 100,000 acres of Forest Service land on the Kenai Peninsula. An arbitrary ban on road construction in areas along the Seward Highway which qualify as "roadless" (whether inventoried or un-inventoried) would preclude most management options (when economic viability is factored in) presently available to the Forest Service to deal with the extremely high forest mortality that has resulted from this insect problem. At this time, ecological and silvicultural considerations argue strongly against foreclosing options until the extent of appropriate management techniques can be fully assessed. (Tribal, No Address - #52495.93310)

Another example of inconsistent initiatives involves the Interior Columbia Basin Ecosystem Management Project (ICBEMP) Supplemental Draft Environmental Impact Statement, which pointed out that western white pine (*Pinus montícola*) and whitebark pine (*Pinus albicaùlis*) have decreased by 95 percent of their range within the project area. The way to recover the white pine cover type is through a disturbance process that allows managers to plant blister rust resistant white pine. If we want to bring back the white pine cover type within roadless areas this will be difficult if not impossible. Without access to these areas through a road network, even if the Agency wanted to use mechanical treatment it would likely be cost prohibitive. This is not considered within the roadless evaluation. (Timber Association, No Address - #52501.93310)

I believe a healthy forest is everyone's goal. As a timber worker I feel closer to the issue than most people. Our forests have become unhealthy because of past and current management practices. The stated goal of proposals such as the Interior Columbia Basin Ecosystem Management Project (ICEBEMP) is a return to pre-settlement of historic conditions. This is a noble goal, but is not attainable without extensive management. Just for example, what we know of historic conditions indicates inventory levels of 100 to 150 trees per acre maximum. Current inventory levels are 3 to 6 times that, both inside and outside of roadless areas. Therefore, we must remove up to 500 trees per acre to attain these project goals and achieve healthy forests. How can we do this without roads. (Individual, Colville, WA - #7191.93310)

Public Concern: The Forest Service should use management practices to remove or thin trees/fuel before fire occurs.

Other than the fact that you are not helping maintain a HEALTHY forest which is supposedly your job classification, you are basically condemning the forests that have these roadless areas within them to be assured of having an explosive fire in the future. Without the proper removal of the fuels (done by mechanical logging, or removal of some sort other than the lets start a fire mentality which has proved to be expensive, not controllable and reduces the forest to ash) you will never have a healthy forest. (Individual, Foster, OR - #5484.93310)

The proper way to manage a forest is to let the timber industry come in and thin out large areas that could serve as a fire break and a refuge for animals when a fire starts. By closing off the forest, old trees will fall down and provide fuel for a fire. And as long as there is fuel, it will burn. Even if you exclude all humans, sooner or later lightning will strike and start a fire that will destroy and kill everything in its path. (Individual, Snowflake, AZ - #6892.93310)

We went to John Day and Dayville, Oregon this spring, My unemployed brother-in-law who is a log truck driver took me in the forest to show me what our government is doing. There I viewed Rust diseased trees. These trees are usable if they are cut right away. But the Forest Service say's NO. Then he showed me where the Forest Service let forest fire burn thousands of trees. The saw mills can use them if they are used right away. But it takes the Forest Service 3 years to issue a permit, then the saw mills no longer want them. (Individual, Ewen, MI - #8321.93320)

ONLY IN URBAN INTERFACE AREAS

Specifically I urge you to keep all remaining roadless areas of 1000 acres or larger in our National Forests roadless. I am opposed to new mining, logging, or motorized activity in these areas, including helicopter logging, excepting cases where management is reasonably necessary to protect towns from fire. (Individual, San Rafael, CA - #7664.61310)

So called "stewardship" activity might be allowed if near human habitation in order to reduce fire risk but should generally not be used in interior areas where nature should usually be allowed to take its course. Due to these failings and concerns, we have difficulty accepting the "stewardship" logging alternative, particularly in our roadless areas. (Environmental/Preservation Organization, Seattle, WA - #10788.93310)

The Forest Service is also concerned about fire hazard in roadless areas. Unfortunately properly implemented restoration harvesting, controlled burning, and other measures to reduce fire risk are expensive and grossly under funded. It makes much more sense to use the limited funds available in currently roaded areas, particularly on the "urban interface" where there is high risk to private property. If funds increase dramatically, fire control can be expanded to roadless areas in the future. (Environmental/Preservation Organization, Seattle, WA - #10788.93600)

Public Concern: The Forest Service should address whether natural processes, such as fire, are far more destructive than logging.

[For] millions of years the forests have had fires that have reduced huge areas to ash. Logging is far less destructive than these fires. The ash from these fires was washed into the rivers and streams on a much larger scale than sediment from a logging operation, and the trout survived!!!! (Individual, No Address #197.83120)

We are particularly concerned with forest health management under this proposal. We have watched the USFS forsake proven management techniques now to avoid the threatened litigation of the environmental fringe as they challenge each timber sale, each thinning operation, each beetle infestation control strategy and each vegetation management plan recommended by local managers. Predictably we have a massive overgrowth of flammable material in our forests and it is only a matter of time before we create the same scenario in Idaho that is going on in New Mexico and Colorado. The right weather conditions will spark huge conflagrations and with no access as defined in this proposal, we will simply burn up our natural resources. A burned out hulk does not support higher water quality, better air quality, fishing, hunting, biological diversity, endangered species or anything else. What we will accomplish is total destruction of the resources and the beauty of Idaho. If there is some doubt as to the destructiveness of a massive fire, take a look at the Payette National Forest north of Lowman. After 10 years it is still a denuded large area that washes entire mountains into the Payette River in a rainstorm. Now this may be perfectly acceptable to some, but to us and to most Idahoans it is totally unacceptable. Business/Business Association, Boise, ID - #6472.84000)

Fires do a lot more harm to the trees and vegetation than logging out the timber. (Individual, Helena, MT - #6409.84000)

Public Concern: The Forest Service should not build new roads because existing roads provide adequate access for management activities.

Within the Lost River Ranger District of the Salmon Challis National Forests sufficient roads already exist to permit appropriate land management for grazing, recreation, and fire or noxious weed control. (Individual, Arco, ID - #9379.71300)

The plan allows emergency roads if people are threatened. Fire crews [can be] dropped on fire sites by plane or helicopter. No roads needed. (Individual, Missoula, MT - #12516.84200)

Public Concern: The Forest Service should focus management efforts on restoration.

The damage has been great and we must put our wills, science ad creativity at the service of restoring and preserving what's left. (Individual, Talent, OR - #1497.84600)

Our National Forest System is composed of just over 190 million acres, around half of which we have damaged. They need restorative action if they are to again flourish. With a few small exceptions we are not restoring this huge landscape and are instead continuing to degrade our national forests. (Environmental/Preservation Organization, Bayside, CA - #1387.84600)

Mining should not be allowed. Leave these areas alone and let them heal from man's impact. In specific areas restorative work for this healing should be allowed. (Individual, Talking Rock, GA - #800.84600)

Isn't it time to get serious about healing the land, and initiating wide-scale ecological restoration work? I would say "Yes!" to both of these questions, and I hope you will too. (Individual, Logan, UT - #1523.84600)

Allowing the continued destruction of what we proposed to save is saving nothing. The mining and logging industries keep saying they will restore these areas to a natural condition. Every evidence I've seen is to the contrary. Forests are never restored to their diversity and mining sites run off into the rivers and lakes. (Individual, Stockton, CA - #3665.84600)

If the logging companies are taking such good care of the lands that they've cut; if they've restored them as they were, why do they need to keep cutting ancient and old growth forests? Why not use them as blueprints for the restoration of what they've already cut? (Individual, Stockton, CA - #3665.84600)

Public Concern: The Forest Service should define what it means by restoration forestry and determine the most appropriate lands for treatment.

We hope the next environmental document will flesh out just what constitutes stewardship logging and recognize some areas have retained a natural ebb and flow that need to progress unhindered by well-intentioned interference. Instead, the Forest Service insists upon mischaracterizing Alternative 4 as neglectful and harmful to the public. Perhaps where roadless areas are in close proximity to high population centers. But, in those unroaded documented roadless areas that abut wilderness areas or other roadless areas, this may truly do more harm than good. Solid, objective criteria should be in place before giving carte blanche permission to local folks to cut at the first sight of a southern pine beetle. (Environmental/Preservation Organization, Plymouth, MN - #51067.93300)

IN CONSULTATION WITH INDEPENDENT SCIENTISTS

We [Society for Conservation Biology] urge you to consider restoration and management guidelines for roadless areas extremely carefully in your rule-making process, with the ultimate goal of preventing inappropriate or damaging logging while restoring the ecological integrity of roadless areas degraded by fire suppression, high-grading, livestock grazing, exotic species, or other ecological disruptions. Before proceeding with a sweeping policy of restoration forestry in roadless areas--or, for that matter, anywhere on national forests--the Forest Service needs to define in explicit, scientific terms what it means by restoration forestry. Independent scientists should be contracted to assist the Forest Service in determining what forest types and specific areas might benefit from active restoration and management and how such projects could be designed and implemented to maximize benefits to biodiversity while minimizing risks. (Environmental/Preservation Organization, Corvallis, OR - #6130.84600)

Public Concern: The final rule should permit stewardship timber harvest only to restore natural forest structure and composition.

The Proposed Rule should be MORE restrictive in that the logging that does take place in these roadless areas should be limited to stewardship logging with the objective of protecting watershed and ecosystem functions. Consistent with this objective, this logging should never include the oldest class of trees on the site; should employ low-impact equipment to reduce or eliminate damage to soils; and should be a one-time entry into an area sufficient to allow reintroduction of fire at the completion of the stewardship logging. (THE DEFINITION OF STEWARDSHIP LOGGING IS PROVIDED IN YOUR DEIS SUMMARY AND PROPOSED RULE (PAGE S-8, DEIS SUMMARY.) (State Elected Official, Salem, OR - #18661.84100)

I would urge you to move toward the alternative that permits stewardship harvest only. Then activities which promote forest health and recovery from decades of unfortunate management practices would be possible in forested roadless areas if and where they are really needed. In such cases, you could even tolerate commercial projects that enhanced the condition of the forest while producing some valued boards and fiber. (Individual, Camp Sherman, OR - #6100.84000)

We note that fire-adapted forest types, such as longleaf pine and ponderosa pine communities, in roadless areas and elsewhere, often have been degraded by many years of active or passive fire exclusion. In such cases, well-planned restoration thinning, combined with prescribed burning, to restore natural forest structure and composition is scientifically defensible. Many or most of these projects will be "noncommercial," although some might involve commercial thinning. We see no inherent reason why restoration should not be able, at least partially, to pay for itself when a significant volume of post-suppression wood is available. Restoration activities must be pursued carefully, however, because they have the potential to do more harm than good if pursued recklessly or with hidden (or not so hidden) economic motives. (Environmental/Preservation Organization, Corvallis, OR - #6130.84100)

Past logging practices permitted and encouraged by the Forest Service have irreparably harmed many areas of the state, and rehabilitation will take untold numbers of years and dollars. What remains, including tracts of land less than 5,000 acres, should be off-limits to all but the most sensitive, scientifically-based (NOT simply timber science, but science based on biological diversity), and least-impacting logging. Frankly, at this point in time, I am not sure that that can be done, and, consequently, no logging of any kind should be permitted until a total scientific picture can be documented. (Individual, Bozeman, MT - #10908.93300)

Public Concern: The final rule should assure that stewardship timber harvest is not standard commercial harvest under another name.

Of special concern to me is the lack of protection from logging practices within the roadless lands of the proposal. I can see a possible need for small scale logging incorporated into carefully crafted stewardship programs to rejuvenate forest health and reduce fuel loading where past management practices have allowed this to get out of hand. But I believe this rule should protect forests from purely commercial logging and from abuses that I believe have occurred in the past that have used supposed insect control simply as an excuse to certify cutting timber. (Individual, Boulder City, NV - #1039.93310)

Beaver Park is too small to permit wildfires, so it will require active management such as cutting wildlife clearings, restoring aspen stands, and prescribed burns. This can be done without roads and we should not let the loggers with their own agenda of getting out the cut…dictate ecosystem management. (Individual, Rapid City, SD - #9935.83000)

I notice with amusement the new forestry practice of fire suppression, which is a new term for an almost clear-cut. Leaving 16-25 trees per acres is, for all practical purposes, dooming that land to be clear cut in the future with the excuse that it will not regenerate any growth on the cleared ground. (Individual, Williams, OR - #150.84200)

We are also concerned about the use of restoration harvesting in our roadless areas in many circumstances. Whereas the concept of improving "forest health" sounds appealing, this type of logging has often been used to log in areas that are ecologically sensitive, to take the best trees in a stand (i.e. high grading), to log healthy as well as unhealthy trees and to generally just continue logging with limited restriction. This was frequently done during the time of the "salvage rider" in the 1990s. The Forest Service almost always lacks funding to adequately monitor these types of operations or simply ignores this obligation in favor of self-monitoring. In other circumstances, the Forest Service feels a need to offer healthy trees in order to make a timber sale attractive to potential bidders. This is counterproductive to good forest stewardship and is often more ecologically damaging than healthful. (Environmental/Preservation Organization, Seattle, WA - #10788.93310)

BAN ALL TIMBER HARVEST IN ROADLESS AREAS

Past timber development activities have contributed significantly to ecological degradation, the destruction of fisheries, and the creation of a fire regime that presents the greatest risk in history of widespread, systemic, catastrophic fire. The issue of "forest health" is one that has been developed by the wood products industry and perpetuated by the congressional delegations of the western states to justify continued timber development, even in areas in which logging activities are economically unsupportable. The Forest Service's own research, which has been validated by the General Accounting Office, indicates that previously logged areas are at greater risk for catastrophic fire than undisturbed forests. The plan should, accordingly, exclude all timber harvest activities, whether for "commercial thinning," "salvage," "forest health prescription," or any other reason. (Individual, Livingston, MT - #6716.84000)

Public Concern: The Forest Service should establish criteria to identify forest health conditions that would require entry into roadless areas.

A second criteria should be developed to establish conditions for entry into these roadless areas. Forest lands are primarily living systems that change over time. Conditions should be identified where roading is appropriate due to threats of fire, insects, or disease. This is far more appropriate because as the committee of science report points out local land managers and the public could use that criteria to consider the unique nature of roadless areas and evaluate options for desired future conditions. (University/Professional Society, Helena, MT - #11164.63000)

Public Concern: The Forest Service should allow thinning of undergrowth in roadless areas if there is a protocol for the maximum diameter of stems and trunks that will be removed.

I prefer Alternative 3 with some safeguards. Fire suppression has put many western forests at risk. I support stewardship in the form of fire prevention by thinning undergrowth if there is a protocol for the maximum diameter of stems and trunks that will be removed. Also we need to limit the number of years when this kind of stewardship will be practiced. (Individual, Ashland, OR - #6905.64130)

RESTRICT LOGGING TO TREES EIGHT INCHES IN DIAMETER OR LESS

Logging should be banned not only for extraction but also for responding to insect, disease, fire protection, and other prescriptive uses. One might consider banning logging except for those trees less than 8 inches in diameter to prevent such prescriptive uses being specified simply to get the cut out. David Wright, Supervisor of the Idaho Panhandle National Forests has stated clearly that logging is not banned in the Forest Service proposal and he intends to use all legal means to remove those trees which based on age (old-growth) and species are valuable to remove by helicopter, cable and forwarder. With this attitude, protection requires a total ban on destructive uses. (Individual, Spokane, WA - #19743.84000)

Public Concern: The Forest Service should reevaluate and scientifically justify the claim that Alternative 3 will have fewer local negative effects than Alternative 4 due to benefits from stewardship logging.

The DEIS says that alternative 4, which prohibits all timber harvest, results in slightly lower values for certain evaluation criteria such as: biodiversity, threatened/endangered sensitive species protection, and terrestrial habitat. This result is due to the Forest Service's inability to accomplish timber harvest that might have beneficial effects on these resources. We feel that the DEIS is [mis]leading in giving lower marks for alternative 4 without similarly acknowledging the clear risks of alterative 3, where stewardship logging can go awry due to the "perverse incentives"….Given the very minor risks associated with not being able to harvest timber under alternative 4, and the very real risks of perverse incentives under alternative 3, [on] balance, alterative 4 is the clearly the superior alternative. (Environmental/Preservation Organization, Eugene, OR - #55101.64140)

Over and over the DEIS claims that "stewardship logging" will have beneficial effects, but the DEIS only once acknowledges that "it has not been shown that large-scale treatment of fuels can effectively restore natural fire regimes and conditions." (page 3-53). This fact (and other similar assumptions underlying the DEIS's optimistic view of alternative 3) must be repeated in every discussion of the supposed benefits of stewardship logging and the "local negative effects" of alternative 4, see for instance fragmentation (page 3-59), "size" (page 3-66), elevation (page 3-69), and ecoregions (page 3-55). The assertions of "local negative effects" are based on an assumption that stewardship logging will be restorative which has not been proven and the DEIS must make clear throughout the analysis and in making its selection of alternatives in the Record of Decision. The FEIS must include a better description of how logging harms resources found in roadless areas. Landslides, soil compaction, fragmentation, etc. (Environmental/Preservation Organization, Eugene, OR - #55101.82000)

Public Concern: The Forest Service should award experimental contracts for stewardship timber harvest and contract any commercially valuable timber separately.

Competence in the conduct of restoration projects is paramount. We suggest that restoration and stewardship contracts for roadless areas be awarded to firms and organizations with professional experience and track records of competence in forest, fire, and restoration ecology. Restoration proposals should be reviewed by independent scientific peers, with performance under the contracts monitored and assessed rigorously. If commercially valuable timber is removed in a restoration project, we suggest the sale of the cut wood be executed from a separate contract, so that legitimate restoration and commodity production are not entwined. We believe that under no conditions should new roads be built to conduct restoration activities and that restoration experiments proceed cautiously, targeting mainly small roadless areas or portions of larger roadless areas first in order to test treatments in an adaptive management framework. It may be that some combination of alternatives 3 and 4 in the DEIS would provide the standards necessary to assure competent and cautious stewardship of roadless areas. (Environmental/Preservation Organization, Corvallis, OR - #6130.84600)

Public Concern: In order to reduce fuel loads and achieve a healthier balance of flora, the Forest Service should provide funding for meeting stewardship objectives independent of the economic value of the timber that needs to be removed.

Separation of the economic harvest incentive from stewardship objectives...in other words, funding should be provided for meeting stewardship objectives independent of [the] economic value of the timber that needs to be removed in order to reduce fuel loads and achieve a healthier balance of flora. (Individual, Winthrop, WA - #10505.93630)

Public Concern: The Forest Service should allow natural processes to predominate in wild forests.

We find it notable that the forests existed for thousands of years without such intervention and believe that they can continue to exist without this additional disturbance. Local disturbances often termed as "unhealthy" will always occur but this should not always call for human intervention, as they are all part of the natural process. (Environmental/Preservation Organization, Seattle, WA - #10788.93310)

My first assertion growing out of my experiences is that professional foresters, with a few exceptions, have little understanding of the nature and value of a wilderness. They are trained to professionally "manage" the resource, with the emphasis on "manage." Among my friends, there is almost no cognizance of any value in trees other than the economic-board feet of lumber or tons of fiber. That there may be other values seems to be a mystery to them. That totally different modes of "management" should be applied to a wilderness as compared to that applied to an industrial forest, seems to be a concept that is very hard for them to grasp. I hear them talking about the "ugly" condition of the area following the blow downs of July 4, 1999, and I hear them moan and groan about the devastating effect of a wild fire unless this situation is carefully "managed." What is usually meant is the building of roads to recover valuable (monetarily) timber and reduce ground fuel. I find it incredibly curious that extensive blowdowns occurred throughout the forest's history, and wild fires have occurred repeatedly, yet, without the infinite wisdom of professional managers, the forest was lush and green and beautiful when the first white men journeyed through the area. A part of the problem is that most of us live with very short term expectations. We expect the entirety of history to be encapsulated within our life spans. That is just not the way the natural universe operates, especially wilderness….
I think that there are huge lessons to be learned in the present situation in the BWCAW. First, we need to learn, and to teach that a true wilderness philosophy does not permit us to "manage" for the short term to make us think we are doing something virtuous. We need to remember that some of our short term "warm fuzzies" have turned out to be disastrous. A wilderness should be allowed to manage itself without our intervention. If we allow that we just might learn something of higher value. (Individual, Grand Rapids, MN - #7520.90240)

I know logging companies like to state they are helping the forest by removing 'old decrepit' timber, however, the forests got along for millions of years without human intervention, and will do so again if we let the natural balance take over. (Individual, Raleigh, NC - #329.84000)

Public Concern: The final rule should eliminate the exception for salvage logging after catastrophic events.

I am also concerned about the possibility for on-the-ground abuse of the proposed exemption of "catastrophic events" from the prohibition (p. A-27, 294.12(b)(1)). The draft policy states that the exception is not intended to cover "routine forest health activities, such as temporary road construction for thinning to reduce mortality due to insect and disease infestation" (p. A-9). The final rule should specify that salvage logging either before or after natural disturbances, is prohibited to roadless areas. (Individual, Laramie, WY - #11367.93320)

[The rule] should…include [prohibition of] salvage logging following "catastrophic" events such as blowdowns for activities following fires. Too often perfectly natural events have panicked forest managers into believing the CAN DO management ethic means salvage logging and road building to remove downed trees and debris. This often results from ecological illiteracy and creates one ecological crisis after the next always relying on more and more human energy/tinkering which enhances the crisis even further. While we understand the need for flexibility to assure public health and safety is not compromised by fire or catastrophic events where they may render harm outside the sphere of a roadless landscape, the DEIS is clear that roadless areas represent a low fire risk and are in far less need of "forest health" treatments than the areas already "treated." Thus the DEIS and rule should make it clear that salvage logging should be prohibited after natural disturbance regimes. (Environmental/Preservation Organization, Hyrum, UT - #43367.93310)

Public Concern: The final rule should permit salvage logging.

Objections to Roadless Areas in the Chequamegon and Nicolet National Forests:
When a violent wind storm knocked down the trees in the Flambeau River State Forest, the tree protectionists wanted to let the damaged trees rot. Because there were roads, the salvage crews won and used the good parts. Now the foresters have looked at the difference and found the area which was salvaged is in better condition than the part which was allowed to rot. (Individual, Park Falls, WI - #13676.93320)

My constituents feel strongly about this also. In 1997 and 1998, I surveyed my House District (District 11) households and asked "Should the United States Forest Service or the Alaska Division of Forestry offer areas severely effected by spruce beetle kill for harvesting by logging companies?" In both years, over 87% of those responding to the question answered in the affirmative. (State Elected Official, Anchorage, AK - #17254.93310)

6.3.5 Fuel Reduction and Fire Management

Fuel reduction and fire management are intimately related to overall forest health and timber harvest, so related concerns are found both in the previous section and in Chapter 5. Just as many are concerned with the Forest Service's continued ability to conduct effective management in roadless areas, many are specifically worried that the final rule will have negative effects on fire suppression tactics. Some would like the Final EIS to describe the effects each alternative would have on fire suppression tactics. One individual would like the forest Service to employ "management techniques that will progressively rid the areas involved" of fire hazard. Some would like the Forest Service to plan for managing catastrophic fire incidents in roadless areas.

Numerous respondents are concerned with the effects of a road building prohibition on firefighting. The Forest Service should not compromise wildland firefighters' safety by lack of roads, many avow. "If fire fighters go in to fight a bad fire they might get pinched off, trapped or even killed because there isn't a complex enough system of roads to cross and circumnavigate the fires zones. This makes the roadless issue a safety issue," concludes one Colorado resident. To reduce such risks, some call for the Forest Service to be pro-active by building roads to reduce fire risk. Others feel that road construction for emergency access should be limited to buffer area firebreaks. Many other respondents do not feel that the Forest Service should build roads into roadless areas for fire control. "The two recent major fires in Colorado were on lands that were covered with roads. The abundance of roads did not play a decisive role in the eventual control of these fires. That was accomplished mainly as a result of fortuitous rain showers. In fact, it was the roads that facilitated and encouraged access by people to the remote locations where they started the fires," counters another Colorado citizen. These respondents fear that fire management will be used as an excuse for continued road construction and logging. "The arguments to support logging are not supported . . . building roads to protect from fire is not justified. Human access and logging activities can increase fire danger. Larger, more mature trees are more resistant to fire than thin crowded stands of second growth after logging. And precisely because of natural fire, more natural areas need to be set aside to preserve them after one area burns," states an Oregon resident.

Many cite Forest Service research and other studies which conclude that timber harvest, through its effects on forest structure, local microclimate, and fuel accumulation, has dramatically increased fire severity. They assert that the Forest Service should reject commercial timber harvest for fire reduction, as it will result in precisely the opposite result. Given the changes in forest structure and increased catastrophic fire hazard caused by cattle grazing, others assert, the Forest Service should prohibit this activity in roadless areas targeted for fireproofing treatments. Others disagree, seeing grasses as a fire hazard. They feel that the Forest Service should encourage grazing in order to reduce the likelihood of fires. Others contest the assertion that roaded areas are more fire-prone than roadless areas, and think that the Forest Service should reassess this conclusion.

Many citizens request that the Forest Service consider implementing prescribed burns for fuel management. Even if alternative fuel reduction strategies such as prescribed burns are adopted more widely, however, many feel that the Forest Service should harvest some timber to control stocking levels before fire can be introduced. On the other hand, given recent events and the tragic Los Alamos fire, many are wary of an increase in prescribed burning activities by the agency. Some feel that the Forest Service should redefine and narrow the parameters for the use of controlled burning to reduce risks. Others insist that government agencies should implement a moratorium on prescribed burns.

Public Concern: The Forest Service should describe the effects each alternative would have on fire suppression tactics.

Fire Suppression Comment: General--This section is well written and analyzed. However, there must be discussion on the effects all alternatives will have on fire suppression tactics. For example, will dozers be prohibited? How will burned area rehabilitation be accomplished? Are roads acceptable for fire suppression when public safety and property are not threatened? Relief: The Forest Service must identify those fire suppression practices that are acceptable. (County Elected Official, Worland, WY - #16185.84200)

Explain the dynamics and control of forest fires. (Individual, Missoula, MT - #8893.84200)

The consequences of allowing forest fires to burn out of control due to inaccessibility and the fact we have more people and homes in today's society that aren't mobile are very high. Even when we have accessibility prescribed fires are risky; ask the Los Alamos vicinity residents. These fires will not stay within their boundaries established by a political roadless solution. Any forest fire that exceeds 20 acres during summer season is a high risk for control. Hand crews won't control these fires on their own and in many cases roads and access are necessary for firefighters to move to safety or to bring essential equipment to fight fire safely. Have you evaluated the risk to our young woman and men who fight these fires such as those who died on the Storm King fires? I think not but you should when you establish management boundaries that don't address these issues. (Individual, Naches, WA - #28371.93710)

Page 3-106, paragraph 5, "The total acreage that could be potentially treated by stewardship timber harvest for fuel management objectives over the next 5 years is 14,000 acres...The total acres needing treatment compared to the acres actually being treated are so small that a direct effect cannot be established."
If the amount of area needing treatment is so large and the possibility or practicality of stewardship timber harvest on such a small acreage that an impact cannot even be established, why is this even considered a viable alternative? (State Elected Official, Salt Lake City, UT - #43918.93310)

Public Concern: The Forest Service should adequately plan, fund, and carry out management techniques that will progressively rid the areas involved of the fire hazard due to dead fuel accumulations.

I hope the plan is approved and carried out. THE FS MUST, however, adequately plan, fund, and carry out: management techniques that will progressively rid the areas involved of the fire hazard due to dead fuel accumulations that are the result of the many years of total fire suppression. (Individual, Missoula, MT - #7651.93620)

Public Concern: The Forest Service should develop plans for managing catastrophic fire situations in roadless areas.

As ecologists have finally come to accept, disturbance is a very real part of forest growth, development and demise. The forests in the roadless areas are all products of disturbance of one kind or another, often fire. I wonder how you plan to or if you plan to protect those forests from catastrophic disturbances. (Individual, Albany, OR - #5675.80000)

The more land that is managed in an "unmanned" condition, the more often these natural or man-made disasters will happen. The recent huge fire near Los Alamos, NM, is simply one example of what is going to happen with increasing frequency as use of prescribed fire increases. I have used enough prescribed fire, and fought enough fires to know that when you've got a large burn going, anything can happen. The more unroaded areas we have, the fewer firebreaks we have. The larger the roadless area, the more difficult and costly it becomes to fight it because of poor access. (Individual, Philipsburg, MT - 9369.84200)

Public Concern: The Forest Service should not compromise wildland firefighters' safety by lack of roads.

The roadless initiative is nothing short of crazy. Number one if fire fighters go in to fight a bad fire they might get pinched off and trapped and even killed because there isn't a complex enough system of roads to cross and circumnavigate the fires zones. This makes the roadless issue a safety issue. (Individual, Grand Junction, CO - #6380.84200)

Public Concern: The Forest Service should be pro-active by building roads to reduce fire risk.

Would it not be better to be pro-active by building a limited amount of roads and reduce the risk of fires? (Individual, McCall ID - #7019)

Plan must maintain present roads, even in areas under 5000 acres, expand new roads into all areas, because without access to our National Forests, more catastrophic wild fires will continue. (Individual, Florence, WI - #6667.84200)

Public Concern: Road maintenance for emergency access should be limited to buffer area firebreaks.

A forest should be allowed to burn if it catches fire. Road maintenance for emergency access should be limited to buffer area firebreaks. (Individual, No Address - #144.84200)

Public Concern: The Forest Service should not build roads into roadless areas for fire control.

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 - #6848.84100)

Some people claim that lack of roads will hamper efforts to control wildfires. I think these claims are overstated. The two recent major fires in Colorado were on lands that were covered with roads. The abundance of roads did not play a decisive role in the eventual control of these fires. That was accomplished mainly as a result of fortuitous rain showers. In fact, it was the roads that facilitated and encouraged access by people to the remote locations where they started the fires. Without the roads the fires would never have occurred. (Individual, Lakewood, CO - #12965.84200)

Wherein logging may be deemed necessary for fire protection, it should be done without logging roads. (Individual, Spearfish, SD - #6559.84100)

Recently there was a forest fire in the Lost Cove (Pisgah NF) area that I suppose that roads there might have helped get firefighters in. But they got the fire out. What would it cost to build and maintain roads in order to have better access in the possible event of a fire? I'd bet that the cost of the helicopters used to ferry in the firefighters was a whole lot less. (Individual, No Address - #2405.84200)

Public Concern: Fire management should not be used as an excuse for road construction or logging.

I've heard other arguments, too, that the forest will just burn down anyway, so why not cut them down and gain the advantage of timber. But, I don't buy this, as I've seen and compared the results of both logging and natural conflagration, and would much rather have the latter. It is difficult to justify with rational argument, but there is something perceptibly different between the two; perhaps we don't even have the language to describe it. But, simply put--forest fires don't seem to upset the natural setting of the land like logging and replanting does. I've seen the result of lightening-strike forest fires. It is an awesome sort of beauty, and the taller trees remain alive and unaffected in many cases. (Individual, Belding, MI - #2886.84000)

The arguments to support logging are not supported. One, building roads to protect from fire is not justified. Human access and logging activities can increase fire danger. Larger, more mature trees are more resistant to fire than thin crowded stands of second growth after logging. And precisely because of natural fire, more natural areas need to be set aside to preserve them after one area burns. (Individual, West Linn, OR - #706.84200)

Commercial logging of roadless areas is NOT needed to reduce the fire risk and cure insect and disease problems, nor would such logging even be effective to address such a problem. According to scientist in the Sierra Nevada Ecosystem Project, logging is the single greatest cause of increased fire risk. The DEIS acknowledges "uncertainty" among fire researchers about the effects of timber harvest or thinning on fire risk, due to factors such as increased drying and wind (p. 3-156). Moreover, as documented in the DEIS, "Areas that [are] more highly roaded have a higher potential for catastrophic wild fires than inventoried roadless areas" (p 3-157). In addition, "relatively few inventoried roadless areas are located near the Wildland-Urban Interface where high concentrations of people dwell, recreate, or work" (p. 3-154). Consequently, there is less need to be concerned about roadless areas fires threatening human life or property. (Environmental/Preservation Organization, Eugene, OR - #55101.84100)

Public Concern: Timber harvest, through its effects on forest structure, local microclimate, and fuel accumulation, has dramatically increased fire severity and thus the Forest Service should reject commercial timber harvest for fire reduction.

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: WE NEED TO LOG OUR NATIONAL FORESTS TO PREVENT FOREST FIRES AND DISEASE.
FACT: Commercial logging does not prevent catastrophic fires, it causes them. Fire is a natural and beneficial part of forest ecosystems. Avoiding catastrophic fire risk is often used to justify logging. Ironically, according to a 1996 report by the Sierra Nevada Ecosystem Project, "Timber harvest, through its effects on forest structure, local microclimate, and fuel accumulation, has INCREASED fire severity more than any other recent human activity." Another Forest Service report, "Forest Resources of the United States" (1994), revealed that tree mortality in the West due to fire and disease INCREASES in logged areas. According to Arthur Partridge (former logger, Forest Service employee, and professor at the University of Idaho), "Claiming harm to forest health is merely an excuse to log....In terms of disease and insects there has been no difference in true forest health for at least 50 years. In fact, a report from the U.S. Forest Service indicated that between 1952 and 1992 the amount of damage from disease, insects and all other major causes including fire--was less that 1% of the standing commercial timber throughout the U.S. And the numbers stayed at those levels the entire time, with no ups and downs." (Individual, Bradford, PA - #7842.84000)

I am a former wildland firefighter and forestry aide, and therefore must comment on the timber industry's stand on logging as a means of "Fire Prevention": large timber harvest do not prevent wildland fire hazard. If anything they increase the hazard by:
1) leaving all the small combustible fuels behind which create the biggest risk.
2) creating large amounts of slash left behind.
3) use of flammable equipment which uses fossil fuels and generates sparks, and
4) taking out the large old-growth trees which in fact can withstand great heat during a prescribed understory burn (and many tree species need fire to survive).
With this in mind, I feel that the wood products industry's argument against the Roadless Conservation Area Proposal, from a fire-management standpoint, in invalid. (Individual, Corvallis, MT - #9400.93310)

In considering whether Alterative 4's prohibition of logging in roadless areas will create worse fire hazard, I'm sure these areas not having old dried up leftover logging slash must be factored in. Undisturbed high elevation forests may retain moisture a little better. (Individual, Standard, CA - #7585.84100)

Commercial logging of roadless areas is not needed to reduce fire risk and cure insect and disease problems, any ecologist will tell you that. In fact by clear cutting and logging forests, dries out the soil and the majority of biomass from plants (which 80 [percent] of the plant is underground) dries out and becomes fuel for fire. In Wyoming we have enough problems with drought clear cutting forest will not help our forest. Fire should be allowed to follow its successional rhythms of nature and not interrupted by clearcuts. (Individual, Laramie, WY - #11367.84000)

Opponents of the wild forest roadless initiative claim that protecting these areas from logging and road building will lead to increased fire risk. Here are some points to help you refute those arguments at hearings and in letters to the editor. One of the major examples that timber industry proponents point to as a symptom of the "forest health crisis" is forest fires. But the truth is, forest fires are not bad. They are a natural, integral part of the disturbance and recovery patterns of healthy forest ecosystems.
Fire dependent forest ecosystems rely on fire, often at frequent intervals, to start the renewal process allowing new trees to grow. Yet every summer, the perpetrators of the "forest health crisis" hoax take advantage of tragedies like the loss of life and property to call for more extensive logging in our National Forest. They call for new roads and extensive "thinning" and "salvage" to reduce the "fuel load."
Logging increases fire hazard by leaving behind slash and other wood that is not commercially valuable that fuels fires. This is by no means a minor problem. The Sierra Nevada Ecosystem Project report, a

comprehensive scientific study requested by Congress, concluded that "timber harvest...has increased fire severity more than any other human activity." (Individual, Fayetteville, AR - #6991.84000)

At a hearing here in Idaho Falls last night a lot of those opposing the initiative kept talking about how it would lead to more wild fires. I don't believe that wild fire is actually an issue in this discussion either. First, fires in unroaded areas are not as severe as in roaded areas because of less surface fuel, and after fires at least some of the large trees survive to produce seed that regenerates the area. Many of the fires in unroaded areas produce a forest structure that is consistent with the fire regime, while the fires in the roaded areas commonly produce a forest structure that is not in sync with the fire regime. Fires in the roaded areas are commonly more intense, due to drier conditions, wind zones on the foothill/valley interface, high surface fuel loading, and dense stands. Of course you already know this because it comes from the ICBEMP science report. (Individual, Idaho Falls, ID - #6836.84100)

Timber-cutting, road building and fire suppression have led us to the situation we are in today, in which many of our forests are like tinderboxes waiting to explode. The areas that burned hottest in the Cerro Grande Fire had some of the highest road density in all of New Mexico's forests. In fact, all of the fires that have raged in New Mexico's forests in months have been in well-roaded areas that were clear-cut at one time or another. These activities allowed winds and the sun to dry out the forest floor, depleting groundwater, allowing build-up of undergrowth and generally altering the character of the forest. (Individual, Albuquerque, NM - #7283.84100)

Public Concern: Given the changes in forest structure and increased catastrophic fire hazard caused by cattle grazing, the Forest Service should prohibit this activity in roadless areas targeted for fireproofing treatments.

Cattle grazing has caused infestation of "doghair" thickets of stunted, small diameter trees. They become the "laddering" fuels allowing fire to ascend to the crowns of mature trees. Before cattle grazing, the forest floor grass out-competed pine seedlings and suppressed excessive pine regeneration. For this reason, it is important that cattle be prohibited in any roadless areas and especially those proposed for "fireproofing." We taxpayers should not be subsidizing the private enterprise of ranchers. They are…having a negative impact on public lands. (Individual, Prescott, AZ - #17337.90340)

Public Concern: The Forest Service should encourage grazing in order to reduce the likelihood fires.

Biodiversity is imperative. Cattle are beneficial to reducing fire hazard by keeping grasses down. We need to encourage ranchers to continue this practice. (Individual, Sundance, WY - #18436.83400)

Public Concern: The Forest Service should reassess the assertion that fire hazard is greater in roaded areas than it is in roadless areas.

I thought I'd start my comments with a picture of a roadless area in Idaho. This scenic shot was taken in Elk Creek a tributary of the South Fork of the Salmon River, an important anadromous fishery. The area was a Douglas-fir Ponderosa Pine forest, which typically had frequent non-lethal wildfires. Decades of fire suppression allowed fuels to build up to unnatural levels. Fire burnt through the area in 1984 and again in 1994. A major flood occurred in 1997. The majority of the burned area is pockmarked with landslides and debris torrents. Practically all of the erosion ended up in the streams. Accelerated erosion continues today due to the oversteepened, raw, scoured draws. This condition of roadless area was not featured in your web page. This is one of many roadless areas in West Central Idaho with these conditions, resulting from uncharacteristically hot wild fires. Your sound bites (Lyon's testimony before a congressional committee for one) are saying that the fire hazard is greater in roaded areas with managed forests. "Areas that are more highly roaded actually have a

higher potential for catastrophic wildfires than inventoried roadless area" (DEIS p3-157). The wildfires of the past two decades in West Central Idaho refute that. Hundreds of thousand of acres in roadless areas have been burnt with uncharacteristically hot wildfires. Many more roadless areas are prime to burn in the near future. The amount of roaded areas burned paled to that of the unroaded areas shown in relation to the 300,000 acres of catastrophic wildfires in 1994. As you can see [map] at least 90% of the large fires occurred in roadless and wilderness. This shows the lack of site specific analysis in the DEIS. (Individual, McCall, ID - #7575.33300)

Public Concern: The Forest Service should consider implementing prescribed burns.

Should management activities take place? In the real world of politics this is not an issue as it is obvious that they will be right or wrong, however some management could work to our benefit. First prescription burns can work if done in colder seasons and many of our Western lodge pole stands need a fire soon to prevent a catastrophe. (Individual, Boise, ID - #1661.84100)

Burning should be allowed but only to help achieve a more natural condition and only if cost effective. (Individual, No Address - #5137.10110)

This rule could be improved by insuring that fire becomes the key USFS management tool in roadless areas. In a few cases, thinning from current roads maybe helpful, but only if it can be shown to be improving and emulating natural processes. (Individual, Moscow, ID - #7505.84100)

Public Concern: The Forest Service should balance use of prescribed burns and timber harvest.

The more huge fires we have, the more economic impact there will be in: (1) fighting them, (2) damage to structures, (3) damage to soil and water conditions, (4) air pollution, and (5) most importantly, threat of loss of life. If the use of prescribed fire versus good logging practices were compared in a true Cost-Benefit Analysis, I don't believe prescribed fire would stack up very high as a management tool for general forest areas. Prescribed fire has its place, such as in some wildlife improvement projects, etc., but I believe it is being relied on far too much as a substitute for judicious harvesting of forest products to remove excess fuel. (Individual, Philipsburg, MT - #9369.93000)

Public Concern: The Forest Service should harvest timber to control stocking levels before fire can be introduced.

First, I am against the proposal in this draft. As a professional forester who has worked on, and around Forest Service land in S.W. Idaho, I have seen the results of no management. One hundred years of fire control has resulted in overstocked stands which are insect infested, have heavy fuel loads, and fuel ladders. These stands need stocking control by commercial and pre-commercial harvest before fire can be introduced. (Individual, Boise, ID - #7370.84100)

I also realize that we have made errors in our "management" of these roadless areas in the past and have restocked them beyond their capacity to express the genetic diversity that should be inherent on a "Forest." Thinning of some areas will help speed up the process while reducing the risk of catastrophic fires where both crown and seedbank are destroyed. (Individual, No Address - #1179.84000)

Public Concern: The Forest Service should redefine and narrow the parameters for the use of controlled burning.

Several years ago I wrote a letter to the editor of the International Falls Daily Journal admonishing Voyagers National Park (VNP) for conducting a "controlled burn" on the Kabetogama Peninsula, in an areas that held stands of commercially valuable timber, and in the spring when young of the year birds and animals had virtually no chance of escaping death by fire. The recent "uncontrolled" burns set by the National Park Service (NPS) in the states of New Mexico and Montana have born out our worst fears regarding the use of "controlled burning" as a forest management tool. The destruction of private property, valuable timber, and wildlife, will be incalculable, particularly in the New Mexico burn. NO amount of controlled burning in the United States can justify the immense destruction that took place in these two states. Let us hope that valuable lessons were learned!
Federal, state, and county agencies that prescribe to controlled burning need to redefine and narrow the parameters for its use; and these parameters could be simple: "Never burn when there is even the remotest possibility that the fire could get out of control. Never burn when there is a possibility of destroying private property. Never burn in an area that holds commercially valuable timber. Never burn in the spring when young of the year birds and animals cannot escape death by fire. Fire is not selective--it destroys everything in its path!…In summary, however, we have enough forest fires now that are started by lighting strikes and man's carelessness with fire. We DO NOT NEED an aggressive and unrestrained policy of "controlled burning" that intentionally ignites our precious forested areas. (Individual, Intl. Falls, MN - #7084.84000)

Public Concern: Government agencies should implement a moratorium on prescribed burns.

After the most recent fiasco, Los Alamos, I urge a no more burning moratorium, as several wildfires have been caused by governmental bungling, including one in my area set under adverse conditions which result in a 7,000 acre runaway prairie fire. Please take the moneys for compensation from the Park Service budget not from the taxpayers and expedite the process to the victims along with an apology. (Individual, Newkirk, OK - #4207.84100)

6.3.6 Grazing

Grazing on National Forest System lands is often a controversial subject for members of the public. Several respondents believe a detailed analysis should take place explaining the effects of the proposed rule on grazing allotments. County elected officials question whether the Forest Service intends to recognize "'valid existing rights' to include historical vehicular access used by grazing permittees." Several individuals comment that the proposed rule should not interfere with access to range facilities and stock animals. Many people believe that grazing should be allowed on National Forest System lands and grasslands. One respondent states, "The practice of grazing within well maintained guidelines will not overly impact the areas." This individual believes as long as livestock is rotated on a continual basis, harm to the environment will be minimal, if at all.

Conversely, many people feel grazing should be prohibited or limited to certain geographical areas on public lands. One constituent replies "these cattle are destroying the natural habitat, and they are also destroying the beautiful scenery." Furthermore, decisions about grazing and grazing permits should be made at a national level, not left for local managers to decide, a few individuals advocate. Some suggest that the Forest Service should reduce herd size

and protect riparian areas, while another respondent recommends the Forest Service prohibit cattle grazing in riparian areas and in areas above 3,000 feet in elevation and severely limit it below 3,000 feet. This respondent suggests cattle make areas prone to xeric, biologically less diverse vegetation, and that they can directly affect forest health by removing nutrients from the biological cycle and by increasing the impacts of drought and floods. In addition, one individual calls on the Forest Service to end the practice of killing natural predators to protect domestic grazers.

Public Concern: The final rule should provide detailed analysis of its effects on grazing allotments.

Comment: Page 3-178, Alternatives--Allotment management plans for each grazing allotment are approved using the NEPA process. In some cases decisions have been made that conflict with the proposed rule. For example, the allotment management plan might approve the use of an existing unclassified road. The Notice of Intent for this rule recognizes that these roads currently exist and are being used. Failure to effectively maintain and monitor these roads is a violation of the spirit and intent of NEPA and the terms of Forest Service issued grazing permits. Can you address and disclose the future disposition and use of these roads? Furthermore, any decisions regarding these unclassified roads must disclose the environmental and economic effects. We are concerned about the potential impacts that include increased costs of managing and administering grazing allotments. (County Elected Official, Dillon, MT - #17297.90340)

Juab County residents have been previously damaged economically by the reduction and restriction of livestock grazing in the Uinta National Forest since the creation of the Mt. Nebo Wilderness in 1984. The AUM's have been drastically reduced to virtually nothing inside the wilderness area yet grasses and other ground feed approach "waist height" during summer months. Juab County is concerned that proposing road closures will result in even less livestock grazing. What studies, analysis, and impact reviews have been made of livestock grazing on Mt. Nebo pertaining to current and additional road closures? Please provide copies of such analysis and documentation. (County Commissioner, No Address - #47983.90310)

We also question if you truly intend for "valid existing rights" to include the historical vehicular access used by grazing permittees. This could easily be interpreted to exclude the historical vehicular access used in managing the "privileges" of a grazing permit and include such activities as construction and maintenance of fences, water developments and salting. Such use is often grandfathered in on actual Wilderness legislation and should be specifically provided for in this proposed rule. (County Elected Officials, Parowan, UT - #28911.90320)

Public Concern: The roadless area rule should not interfere with access to range facilities and stock animals.

We need ACCESS TO LIVESTOCK AND RANGE FACILITIES. Ranchers need roads and trails to move camps, to mend fences on grazing permits, to deliver salt and water for animals, and to get trailers in to sick or injured stock. (Individual, West Point, UT - #4008.90334)

This attempt to create roadless areas is redundant and pointless, and potentially damaging for these reasons: Roads are necessary for ranchers to maintain cattle herds grazing on public lands. (Individual, Mountain City, NV - #8455.90340)

The initiative says it would not affect existing routes of access to grazing allotments and it also says no roads or trails would be closed because of the prohibition. I hope that this will continue to be true in this and that we will continue to be able to have the roads that we necessarily need. (Individual, No Address - #22026.90340)

Public Concern: The Forest Service should address the issue of whether livestock grazing should be permitted in roadless areas.

ALLOW LIVESTOCK 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)

We presently graze sheep and some cattle in roadless areas, as long as these animals are rotated in and out at levels that sustain grasses and don't overly impact meadows these practices should be maintained. Water pollution created by grazing animals is unfortunate and can only be improved by reasonable rotation periods. The practice of grazing within well maintained guidelines will not overly impact the areas, however seeing cattle standing in a high mountain lake does not sit well with anyone who appreciates pristine country and resources so some consideration for certain truly pristine areas should be taken into account and grazing eliminated or the rotation speeded up dramatically. (Individual, Boise, ID - #1661.90340)

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)

RESTRICT OR PROHIBIT LIVESTOCK GRAZING

I visit the Cache National Forest (Logan Canyon) on average about 40+ times a year. This forest was one of my favorite places to hunt and fish until the state or federal government started to let cattle ranchers use the forest for grazing. This really makes me mad. Especially since they put the cattle in the area which I usually hunted. Nothing pisses me off more than when I am sitting in my tree stand waiting for a herd of deer or elk and instead of seeing the wildlife I see thousands of cattle. These cattle are destroying the natural habitat, and they are also destroying the beautiful scenery. I know that I am speaking for a lot of outdoorsmen when I say that the government need to get its priorities straight and save our National Forests by keeping sheep and cattle out of the forests. We all know that the ranchers have a place to keep their sheep and cattle during the winter, so why don't they keep them there all year? (Individual, Fielding, UT - #4035.91400)

I would also like to see the United States Forest Service cut back on the number of grazing permits it issues. It is a little irritating to spend a couple of hours hiking to a high country meadow to look for elk and find a couple of hundred head of cattle or sheep there. The western states have been held ransom by the ranchers for over a century and it is time for it to end. (Individual, Peetz, CO - #12932.90340)

Public Concern: Decisions about grazing and grazing permits should be made at a national level, not left for local managers to decide.

The DEIS states that "With respect to inventoried areas, local responsible officials could not authorize the construction or reconstruction of roads but would retain discretion to consider appropriate additional management protection for inventoried roadless areas." This statement stretches far beyond the prohibition against road building, and gives local managers the authority to determine what activities are appropriate for inventoried roadless areas. I believe that a local manager could decide that grazing or any other multiple-use activity compromises the "landscape character and scenic integrity" of an inventoried roadless area, and remove that activity. I am very worried that a manager may determine that fences and other range improvement projects violate the roadless character of an area, which may eliminate many livestock grazing allotments from being grazed properly or at all. Many local managers issue special use permits for motorized use on closed roads to maintain range improvements and for maintenance of the grazing permit, and I believe these opportunities would end under this proposed rule. (Individual, Pinedale, WY - #17692.90340)

Public Concern: The Forest Service should place limits on grazing such as reducing herd size and protecting riparian areas.

Limit grazing:
1) Reduce size of herds
2) Protect Riparian Areas. (Individual, Hailey, ID - #10712.90340)

Public Concern: The Forest Service should not allow cattle grazing in riparian areas or in areas above 3,000 feet in elevation, and should severely limit grazing below 3,000 feet.

Cattle grazing is almost as bad. It should be banned at elevations above 3,000 feet and severely limited below. Certainly cattle should be banned from riparian zones. Everywhere they make for a more xeric, biologically less diverse vegetation. They directly affect forest health by removing nutrients from the biological cycle and by making extremes of moisture and drought more devastating. (Individual, Portland, OR - #6761.90340)

Public Concern: The Forest Service should not pay hunters to kill animals to make the public lands safe for sheep and cows.

Oh yes, I'm against government paid hunters killing our God created creatures to make the public lands safe for sheep and cows. (Individual, Nampa, ID - #18796.90330)

6.3.7 Locatable and Leasable Minerals

Many respondents feel the Forest Service did not give enough detailed baseline information on leasable and locatable minerals and geological formations currently found on National Forest System lands. "There is no way to gauge the order of the magnitude of the impact of the proposed rule without the appropriate baseline information," reflect county elected officials. Officials also state that "at a minimum the description should show existing mining operations that require roads, and areas of known valuable resource deposits." Some respondents feel the Forest Service should analyze in greater detail existing mineral resources and possible restrictions the proposed rule may impose on their development. Specific mineral resources referred to are palladium/platinum resources in the Stillwater Complex; coal deposits in the Cow Creek Buttes roadless area; coal leases which overlap inventoried roadless areas in Utah; and mineral resources in Sky Lakes B roadless area.

The Forest Service should conduct inventories for the occurrence of mineral deposits before designating roadless areas, some suggest. "The following item should be inserted after Section 294.13(a)(9): "(10) Commodity resource supply potential" to ensure that the responsible official takes into account all potential uses of the land in question," asserts a mining association from Nevada. In addition, some respondents feel the Final EIS should specify the anticipated delay for processing road construction applications for mineral development while unroaded areas are being inventoried. Conversely, the proposed rule should specify that all reasonable alternatives to entry must be considered prior to exceptions for mining reclamation (CERCLA--Comprehensive Environmental Response, Compensation and Liability Act) projects. Additionally, one individual questions why conserving roadless

characteristics increases the number of areas recommended for mineral withdrawal as stated on page S-42 of the summary of the Draft EIS.

Many respondents strongly recommend the Forest Service allow mineral exploration and development activities in roadless areas. "Do we, the citizens of this nation, want to become dependent on foreign countries to supply all the minerals we require?" queries one respondent. Comments received from many mining interests contend that widespread exploration for minerals is necessary to find elusive mineral deposits. They feel that expansion of the Forest Service road system is vital to the development of energy and mineral resources extracted from public lands, which can benefit society and the economy. One individual believes that the Forest Service should clarify procedures to determine what is "considered reasonable and necessary" to develop a lease and how that determination will be made. Another individual feels that the Forest Service should not require mineral leaseholders with valid existing rights to prepare an environmental impact statement for mining exploration and development, asserting that this process is an unnecessary and expensive burden to impose on the mining industry. The mining industry, noting a recent Supreme Court decision in its favor, asserts that the Forest Service should assure that the final rule will not restrict existing mineral leases such that lessees will require federal reimbursement for leasing fees.

Many other people believe the final rule should restrict mineral development in roadless areas due to unacceptable human and environmental health risks. One individual states that "mining has caused so much damage to our forest, chemicals from mining has caused our rivers to become deadly cesspools, a polluted quagmire of a hazardous situation." Some suggest that the Forest Service should use its statutory authority to limit access to mining claims in inventoried roadless areas to non-motorized methods or helicopters. One person suggests that the Forest Service allow only small-scale mining by hand. Others recommend the Forest Service prohibit specific types of mining such as strip mining and recreational placer mining. One environmental organization suggests the Forest Service consider all available means of restricting mineral leases, including lease expiration and prohibition of communitization agreements. Others suggest the Forest Service use its authority to withdraw roadless areas from mineral entry. To that end, some respondents request section 294.13 of the proposed rule be modified to require consideration of mineral withdrawal in the forest implementation process. Others request that the Forest Service develop regulations for "grandfathered" mining claims in roadless areas. Additionally, some encourage the Forest Service to purchase all mineral rights on National Forest System lands to stop oil and gas and hard rock mining. A few individuals request that specific roadless areas be protected from mining activity, such as the Sand Creek area in Wyoming.

Conversely, one respondent questions whether track-mounted core drills will be allowed to travel cross-country in inventoried roadless areas. Others feel the Forest Service should adequately address oil and gas operations in the proposed rule. "The Final EIS should contain a discussion of the impacts of the proposed rule on the Administration's goals for promoting the use of clean natural gas," asserts one person.

Many respondents feel oil and gas exploration and extraction should be allowed. One person explains that "since oil is necessary for national security, we should allow for oil exploration and inventory on these lands." Some cite specific areas they wish to see open to continued mineral development, such as the North Dakota Grasslands and the Targhee National Forest. Other respondents feel oil and gas development should be allowed but only on a carefully controlled basis. One respondent requests the Forest Service limit the amount of methane wells allotted to a certain amount of acreage.

Certain individuals feel oil and gas development should not be allowed in the national forests because of the degradation it causes in roadless areas. One individual expresses disappointment that the Preferred Alternative does not preclude oil and gas leasing, but does restrict road access for any new leases in roadless areas.

Public Concerns specific to the legal statutes regulating mineral development are found in Chapter 3.

Public Concern: The Forest Service should provide baseline information on leasable minerals, geology, and hard rock minerals currently found on National Forest System lands.

Page 3-144. The description of the affected environment needs to include some description of the types of leasable minerals developed on NFS lands and the quantities of extraction. There is no way to gauge the order of the magnitude of the impact without the appropriate baseline information.
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)

All of the entries in these tables were derived from public Bureau of Land Management documents, yet none of this information has been cited or referenced within the DEIS or supporting documents relative to the importance of energy minerals and mining in/near proposed roadless areas. Each of these trend points shows a strong financial commitment by coal operations to secure additional leases in the region. Most of these are federal leases outside of USFS lands, but within the vicinity of the proposed roadless areas, and indicate the increased, not diminished, interest in coal leasing for the region. TO PROVIDE ACCURATE AND MEANINGFUL INFORMATION, AN INTERIM DRAFT EIS SHOULD BE DEVELOPED THAT INCORPORATES ALL APPLICABLE INFORMATION ON MINING ACTIVITIES IN/NEAR THE AFFECTED AREAS. THAT INTERIM DRAFT SHOULD BE MADE AVAILABLE FOR AN ADDITIONAL COMMENT PERIOD, TO ALLOW ALL NECESSARY INFORMATION TO BE COMPREHENSIVELY REVIEWED BY THE PUBLIC PRIOR TO ISSUANCE OF THE FINAL EIS. (Utility Group or Organization, Gillette, WY - #28925.93100)

Page 3-142 Where is the baseline description for minerals and geology. At a minimum the description should show existing mining operations that require roads, and areas of known valuable resource deposits. (County Elected Officials, Fallon, NV - #17290.93500)

In contrast to the detailed quantitative minerals analyses undertaken in compliance with the Wilderness Act of 1964, the DEIS "analyzes" the impacts to minerals exploration, development, and production activities on a general nationwide basis. This was necessary due to the limited time frame imposed by senior policy makers in the Administration, including President Clinton, resulting in the fast track of the rulemaking/EIS effort. It was also necessary due to the paucity of information used in the mineral analysis.

The Forest Service relied upon USGS maps of geographic provinces identifying areas conducive to existence of undiscovered minerals (so-called permissive tracts). Socioeconomic Specialist Report, Energy and Non-energy Minerals at G-12 to G-15. These digital maps were overlain with maps showing the inventoried roadless areas. The Forest Service then displayed the gross value of minerals estimated to be contained in those areas in which roadless areas coincided with permissive tracts. Id. Using a single map of an entire geographic region of multiple states showing permissive tracts of undiscovered mineral deposits and combined with a similar scale map of roadless areas results in a GROSS MISUNDERSTANDING of the effects of the proposal upon minerals production and economics.
The Forest Service analysis used data showing the estimates of undiscovered minerals 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. (Mining/Oil Company or Organization, Washington, DC - #52224.90000)

Public Concern: The Forest Service should analyze in detail mineral resources and possible restrictions the proposed rule may impose on their development.

Would road access be allowed to explore a lease in an area not previously roaded? Would it be possible to locate and develop a new mineral lease in roadless [areas]? (Individual, Pocatello, ID - #2959.93500)

Could phosphate leases still be granted in the interim until the proposed rules become final? (Individual, Pocatello, ID - #2959.93510)

The mining industry has indicated that the proposal disallows mining on 43 million acres of federal land. It asserts that more than $7 trillion dollars of coal and metal resources will be placed off limits by the proposed rule. If this is not correct, then FS must explain why these resources will still be available and the approximate cost of obtaining access to the resources in areas where road construction and reconstruction is prohibited. (Federal Agency, Washington, DC - #54012.93500)

Juab County is concerned that a mineral resource analysis does not appear to have [been] performed or mapped. Whatever is not grown must be mined. The Forest Service must insure that a proper, thorough mineral resource analysis is performed including the impact on patented and unpatented mining claims and related property rights if this rule passes. Juab County requests copies of maps and other documentation detailing and describing the mineral resources in the proposed roadless areas and how these resources can be accessed if roads are closed. (County Commissioner, No Address - #47983.90320)

[O]n page 3-194, it is stated that up to a billion tons of phosphate rock (fertilizer) may exist in roadless lands in the West. Implementing a policy which bars future valid rights from ever being transferred may impact food security. The Forest Service should more fully address this additional issue and its impacts on U.S. citizens. (Individual, Whitefish, MT - #30417.93510)

The Specialist Report on "Effects Analysis for Minerals and Geology Resources," states that 68.2 miles of road construction or re-construction have been identified in inventoried roadless areas currently allocated to either a prescription that allows or disallows that activity in the forest and grassland management plans. There is no discussion of the time-frames for that activity or the basis for the figures. Is the Forest Service saying that the impact of the rule will only be on those specific 68.2 miles of anticipated roads? Is that the basis for saying that there will be little impact in the short-term? It is impossible to discern the answers to these questions from the DEIS and related analyses prepared for the public by the Forest Service. (Individual, Purcellville, VA - #15876.93100)

The proposed ruling will have a significant impact on the minerals extraction and exploration activity within the proposed roadless areas. In the DEIS Summary and Proposed Rule document, page S-20, it states that "Prohibiting road construction may reduce exploration and development activity in response to higher access costs. It may preclude future mineral leasing when reliant on road access." It should state that it will in fact eliminate exploration and mineral extraction. Without road access, the cost of exploration activities increases phenomenally, relying solely on helicopter supported drilling and data collection. But why would a company spend any money in an area that is "roadless" when there will never be a way to extract the resource if there is a deposit found while exploring. The document would be more accurate if it stated that exploration and development will be reduced by 99.5%. (Individual, Lava Hot Springs, ID - #18244.93510)

PALLADIUM/PLATINUM MINERAL RESOURCES IN THE STILLWATER COMPLEX

How does the current DEIS address the unique, world class palladium/platinum mineral resources on the Gallatin and Custer National forests along the Absaroka-Beartooth Wilderness boundary within the Stillwater mineral complex? As background, recent Forest Service data show that in Fiscal Year 1999 the gross value of locatable mineral outputs on the National Forests was $636 million. Of the $150 million [that] is attributed to palladium and platinum production--almost one-fourth of the total value.
The DEIS states in one identical sentence repeated in four places, "For example, the Stillwater Mine is the only U.S. mine producing platinum and palladium as primary products." SEE DEIS at page 3-192, page 24 of the Cost Benefit Analysis of April 19, 2000, and page 21 of the Regulatory Flexibility Analysis of April 26, 2000 and page G-6 of the Socioeconomic Specialist Report. This is the entire mineral analysis for the important Stillwater mining area that would be partially overlain by two proposed "roadless conservation" areas, covering what appears to be roughly 25% of the deposit. A more precise quantification of the overlap between the roadless areas and the Stillwater deposit is not possible at this time due to the imprecision of the available Forest Service maps. The Stillwater complex is a "layered mafic intrusive" of igneous rock which spans a surface area approximately 28 miles long by 4 miles wide. A layered mafic intrusive occurs when molten magma intrudes into sedimentary rock and as it cools segregates into distinct mineralogical and textural layers. In the case of the Stillwater, this layering is up to 18,000 feet thick. These layers contain platinum, palladium, chromium, nickel, copper, cobalt, and other minerals. The current mining by the Stillwater Mining Company ("SMC") involves only a 3 to 8 feet layer of the 18,000-foot thick complex. (Individual, Purcellville, VA - #15876.93510)

The roadless conservation proposal will affect not only ongoing and planned development and production activities of SMC [Stillwater Mining Company], but also future mineral exploration 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. (Mining/Oil Company or Organization, Washington, DC - #52224.93500)

"MOST U.S. IDENTIFIED RESOURCES OF PLATINUM-GROUP ELEMENTS (PGE) AND CHROMIUM AS WELL AS MUCH OF THE ESTIMATED UNDISCOVERED RESOURCES OCCUR IN THE STUDY AREA. The USGS estimates that an additional 3,000 metric tons of PGE resources and 4 million metric tons of chromium resources occur in extensions of known deposits. USGS mean probabilistic estimates (in metric tons) for in-place undiscovered mineral resources include: 200 tons of gold, 2,000 tons of silver, 6.5 million tons of copper, 130,000 tons of molybdenum, more than 6.5 million tons of chromium, and 230,000 tons of nickel."…Further, the House Report (No. 95-927) which accompanied S. 1671, a bill to designate the Absaroka-Beartooth Wilderness, stated: "Although the area does contain significant mineral values, several areas containing active mining claims were excluded from the original wilderness proposal by the Senate Committee on Energy and Natural Resources. In addition, the committee recommended deletion of an area containing active mining claims above the west fork of the Stillwater River to exclude the bulk of mining claims….THIS DELETION ELIMINATES MOST KNOWN MINERAL PROVINCES FROM THE WILDERNESS (INCLUDING OVER 99 PERCENT OF THE SO-CALLED STILLWATER COMPLEX), AND SHOULD ENSURE THAT WILDERNESS AND POTENTIAL MINERALIZED AREAS DO NOT

OVERLAP."…Similarly, the Secretary of Agriculture recognized the mineral valued and the work of the BOM and the USGS, which both provided minerals information, in his letter to Chairman Udall, Committee of Interior and Insular Affairs, House of Representatives, dated February 28, 1978. (Individual, Purcellville, VA - #15876.93510)

COAL DEPOSITS IN THE COW CREEK BUTTES ROADLESS AREA

The DEIS states that in the Powder River Basin, 87 percent of the coalfield containing inventoried roadless areas is federally owned coal. DEIS 3-197. Table 13 of the Cost-Benefit Analysis shows that the USGS estimates that the PRB contains 373 billion tons of coal worth $6.5 trillion. The Forest Service has identified inventoried roadless areas within the TBNG in proximity to these world-class resources. The Forest Service admits that "data are not available to estimate the potential economic effects of the proposed rule on future mineral development." Cost-Benefit Analysis at page 30.
The inventoried roadless area identified in Campell County north of Route 450 has already impacted plans for transportation of coal to Midwestern United States markets. Dakota, Minnesota, and Eastern Railroad Corporation ("DM&E") has proposed the construction of 278 miles of new rail line to access the PRB coal fields. This new construction is planned to facilitate the transportation of 50 million tons of coal annually. The initial proposed and preferred route has since been abandoned due to the presence of the roadless area.
The management of the inventoried roadless areas is only one of the many obstacles to development of this world-class coal resource. The U.S. Fish and Wildlife Service will introduce the black-footed ferret on the TBNG in the Rosecrans Cellars area of Westin County. In addition, the Medicine Bow-Routt National Forest is proposing in the Draft Grasslands Land Management Plan designation of the Cow Creek Buttes roadless area as Wilderness. (Individual, Purcellville, VA - #15876.93540)

EXISTING COAL LEASES OVERLAPPING INVENTORIED ROADLESS AREAS IN UTAH

Energy West operates two underground coal mines for PacifiCorp in the Wasatch Plateau coal region of Utah. These two mines, Deer Creek and Trail Mtn., combine for an annual production of over 7 million tons of high quality--low ash coal suitable for PacifiCorp's power plant energy production, presently accounting for over 25 percent of the total annual coal production in Utah (1998 Annual Review and Forecast of Utah Coal Production and Distribution, State of Utah Department of Natural Resources, July, 1999)….The Trail Mtn. and Deer Creek Mines are located within the boundaries of the Manti-La Sal National Forest in central Utah. The DEIS shows locations of inventoried roadless areas on the Manti-La Sal National Forest. An overlay of independently obtained maps of existing coal leases with the DEIS roadless map shows that as much as 25 percent of those state and federal coal leases held by PacifiCorp are overlapped by inventoried roadless areas….which is the case with PacifiCorp's recent acquisition of the Mill Fork state lease tract. Interest in other new leasing areas has been expressed by the coal industry on the Wasatch Plateau. Given that the coal potential is high, there is the likelihood that further exploration will need to occur on other state coal lease tracts (i.e. North Horn, Muddy and Cottonwood). These tracts, now under the leasing authority of the State of Utah (by exchange as part of the recent Staircase-Escalante National Monument negotiations, as was the Mill Fork tract) are overlain by surface managed by the Forest Service. No further federal coal lease tracts are available since the recent Staircase-Escalante coal land exchanges took place. (Individual, Purcellville, VA - #15876.93540)

The estimated recoverable coal on these remaining tracts on the Wasatch Plateau is greater than 200 million tons of high quality coal. These high potential areas are also overlapped with inventoried roadless areas. Although lease issuance for these tracts is under the discretion of the State of Utah, the Forest Service (as surface owner) could significantly impede the State's coal leasing process and hinder the lessee's ability to explore and develop leased tracts. Surface access roads for exploration purposes are necessary to further delineate coal reserves for quality and quantity, as well as assessing the technical aspects of the geologic and engineering conditions. Also, in the event of mining-induced subsidence, the lessee requires the ability to access the surface by road to mitigate any surface damage, and take other actions to aid in the reclamation process and to reduce liabilities. The DEIS at page 3-145 specifically states: "Those [exploration and development] proposals requiring road construction or reconstruction in inventoried roadless areas would not be allowed and consequently, those resources may not be leased, even though future economic circumstances may urge their development. Prohibition of road construction and reconstruction in the unroaded portions of inventoried roadless areas may cause a review of earlier forest plan decisions that identified certain NFS lands

as being available for lease, or where these lands have been scheduled for lease sales after the proposed rule becomes final. The proposed action would also likely restrict the opportunity for exploration and development of presently undiscovered leasable mineral resources in . . . inventoried roadless areas." (Individual, Purcellville, VA - #15876.93540)

MINERAL RESOURCES IN SKY LAKES B ROADLESS AREA

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): MINERAL LEASING DEIS says "Prohibiting road construction may...preclude future mineral leasing..." although effectively all such extraction requires the road access prohibited by the DEIS. Winema Forest Plan provides standards to govern and mitigate access to valued mineral resources (all potential future mineral leases and payments to Klamath County & schools forgone by DEIS) (Timber Company or Association, Eugene, OR - #15879.7000)

Public Concern: The Forest Service should conduct inventories for the occurrence of mineral deposits before designating roadless areas.

ANY AND ALL DESIGNATED AND/OR PROPOSED ROADLESS AREAS SHOULD BE THOROUGHLY STUDIED, INVESTIGATED, AND INVENTORIED FOR POSSIBLE, PROBABLE, AND/OR ACTUAL OCCURRENCE OF MINERAL DEPOSITS prior to any prohibition of new road construction or reconstruction or implementation of any other prohibitions and/or restrictions on activities in such areas. If possible, probable, and/or actual occurrence of mineral deposits is found, no prohibitions and/or restrictions should be implemented in such areas. (Individual, Eugene, OR - #8478.93500)

Public Concern: The Forest Service should insert "(10) Commodity resource supply potential" following Section 294.13(a)(9) in the Draft EIS.

RESPONSIBLE OFFICER MUST CONSIDER COMMODITY RESOURCE SUPPLY POTENTIAL DURING FOREST PLAN REVISION. The following item should be inserted after Section 294.13(a)(9): "(10) Commodity resource supply potential" to ensure that the responsible official takes into account all potential uses of the land in question. (Mining Organization, Reno, NV - #15907.3110)

Public Concern: The final EIS should specify the anticipated delay for processing road construction applications for mineral development while unroaded areas are being inventoried.

The DEIS states (at page 3.241) that the Forest Service anticipates a SHORT-TERM (5-15 YEARS) initial cost to the agency to implement the planning procedures of the roadless area conservation rule to identify and map qualifying unroaded areas of individual forests. Therefore, those wanting to exercise mineral exploration, development, and production may face a "short-term" delay of 5-15 years just for identification of unroaded areas. (Individual, Purcellville, VA - #15876.93100)

Public Concern: The Final Rule should specify that all reasonable alternatives to entry must be considered prior to exceptions for CERCLA (Comprehensive Environmental Response, Compensation and Liability Act) projects.

The exception for CERCLA projects should be limited to situations where no other reasonable alternatives are available that do not require road construction in the roadless portion of inventoried roadless areas. (Environmental/Preservation Organization, Eugene, OR - #55101.64351)

Public Concern: The Forest Service should explain why conserving roadless characteristics increases the number of areas recommended for mineral withdrawal.

Comment: Page S-42 “Increased numbers of areas recommended for mineral withdrawal” is listed as a “Human Use” effect. Explain why conserving roadless characteristics increases the number of areas recommended for mineral withdrawal. (Individual, Twain Harte, CA - #1632.93500)

Public Concern: Roadless areas should remain open to roadbuilding for mineral exploration and development activities.

Mining employs over 320,000 people and the direct or indirect impact on the U.S. economy totaled $523 billion in 1995 alone. It is difficult to identify any industry or profession that does not rely on some product that is linked to mining. Is mining really something we want to do without? Do we, the citizens of this nation, want to become dependent on foreign countries to supply all the minerals we require? (Individual, No Address - #41.93500)

Critical to our nation’s well-being is the discovery of new mineral deposits to replace depleted mines. Developable mineral deposits, however, are not common; concentrations of useful minerals rich enough to form ore deposits are rare phenomena. Thus, commercially extractable concentrations form only where special physical and chemical conditions have favored their accumulation. The roadless areas addressed by this proposal have a great potential for the existence of minerals. According to WILDERNESS MINERAL POTENTIAL, ASSESSMENT of MINERAL-RESOURCE POTENTIAL in U.S. FOREST SERVICE LANDS STUDIED 1964-1984, Forest Service lands under consideration for designation as wilderness lands under the Wilderness Act of 1964, “contain rocks formed in a great variety of geologic environments and many of these environments are favorable for the occurrence of mineral resources and many kinds of resources may be present.” Since metals cannot begin their contribution to our economy until discovery, widespread exploration for minerals is necessary to find these elusive deposits. The procedures of basic exploration-geological mapping, geochemical and geophysical testing and drilling-must take place at many times at the cost of hundreds of millions of exploration dollars before a discovery is made. Exploration cannot, however, take place without roads. Roads provide necessary access to exploration areas and later, development of discovered ores. The Forest Service road system facilitates development of energy and mineral resources extracted from public lands, which can benefit society. The energy and mineral resources produced from National Forest lands are essential to the manufacturing, agricultural, construction, and power-generation industries and had a value of $4.3 million in 1995. (See “Forest Service Roads: A Synthesis of Scientific Information” found on the Forest Service Web Page.) These contributions to the domestic economy were made possible by use of the Forest road system. (Mining Organization, Reno, NV - #15907.71230)

In the case of mineral resources, it is unwise to withdraw land from utilization before the resources are properly evaluated. Mining provides the greatest value per square mile of land. Impacting only a few square miles for a mine can provide hundreds of good jobs for decades. (Individual, Juneau, AK - #2764.93510)

My comments concern the Mark Twain National Forest in southern Missouri. I think the proposed roadless areas should remain open to mineral exploration activities, including mineral leasing and the construction of

temporary access roads for test drilling. All of southern Missouri has higher than average potential for the discovery of economically important metal deposits. I believe that it is unwise to disqualify large areas from mineral exploration without first assessing their economic potential. When conducted properly, test drilling has minimal impact on the forest environment. Reclaimed drill sites and roads are difficult to identify just a few years after reclamation. Finally, if we look at these "roadless" areas honestly I suspect we would find that they offer little in the way of unique visual opportunities or biohabits. Having said that, I must add that I do support the protection of unique areas and habitats. I just believe that in most cases mineral exploration is compatible with these goals. (Individual, Farmington, MO - #7033.93500)

In Chapter 3, pages 192-197 contain a discussion of effects of these actions. It is inappropriate for the Forest Service to factor current trends in the industry into this decision. Some of the reasoning is very circular. The downward trend in the US mining industry can be closely tied to an increasingly stringent and inflexible regulatory environment. By assuming that the trend will occur and imposing yet another set of insurmountable obstacles, the Forest Service may single-handedly be responsible for the final blow to the most fundamentally necessary industry in the world--mining. (Individual, Challis, ID - #8034.91300)

Public Concern: The Forest Service should clarify procedures to determine what is "considered reasonable and necessary" to develop a lease and how that determination will be made.

In addition, who and how will it be determined what is "considered reasonable and necessary" to develop a lease. There is not always agreement between companies and agencies as to what is economically feasible and practical. (Individual, Lava Hot Springs, ID - #18244.93510)

Public Concern: The Forest Service should not require mineral leaseholders with "valid existing rights" to prepare an environmental impact statement for mining exploration and development.

As stated in the DEIS, the Proposed Action and Preferred Alternative is to prohibit road construction and reconstruction in the unroaded portions of inventoried roadless areas. For mineral activities with "valid existing rights"…preparation of an EIS likely would be required. No analysis is undertaken to support this decision other than to say that the Forest Service has determined that these actions may have a significant effect on the quality of the human environment. SEE DEIS at page 3-143.
…Designation and management of inventoried roadless areas as "roadless conservation" areas will have a significant impact on the ability of PacifiCorp--Energy West to operate its existing mines, or for any company to explore and develop possible new State of Utah leasing areas on the Manti-La Sal National Forest. New activities, according to the DEIS, will require preparation of EISs, which will take years and several hundred thousands to millions of dollars to complete. Years of delay or outright denial of operations will result in increased costs to the coal producer and the consumer (the American people who need coal-fired power plants for most of the electricity generated today). The denial and delays while EISs are completed and Forest Plans are amended or revised may necessitate the bypass of coal that would otherwise be mined in the logical order of mining. Generally, these bypassed coal deposits will not be economic in the future. (Individual, Purcellville, VA - #15876.90320)

Public Concern: The Forest Service should assure that the final rule will not restrict existing mineral leases such that lessees will require federal reimbursement for leasing fees.

[T]he United States Supreme Court recently held that lessees may be entitled to restitution of monies paid to the federal government following denial of certain elements of the permission-seeking opportunities promised by

the contracts. Therefore, the agency must ensure that the rule does not adversely impact existing lease contracts that have been executed by the United States. (Mining Organization, Washington, DC - #43583.50000)

Public Concern: The final rule should restrict mineral development in roadless areas due to unacceptable human and environmental health risks.

Mining may be the most long-term destructive use of our national resources. Certainly, no use has been more abused, especially by foreign corporations who use our outdated laws to deplete our mineral wealth. We have better long-term uses for our federal lands. NO MORE MINING. (Individual, Montclair, CA - #889.64150)

Mining has caused so much damage to our forest, chemicals from mining has caused our rivers to become deadly cesspools, a polluted quagmire of a hazardous situation. Mining must be stopped in our forests permanently. (Individual, Greenville, WI - #646.93500)

Especially abusive are the mining outfits that always leave a mess behind that often pollutes our streams with heavy metals and acids that destroy all living things. (Individual, Gualala, CA - #3357.93520)

I have a dead husband and an autistic grandchild because unknown to us, our home was built smack over an old arsenic kitchen from one of Asarco's old smelters in Everett, Washington. What's that have to do with preserving forest land? Road access will allow companies like Asarco to establish a foothold and destroy more lives. (Individual, Easton, PA - #2671.93510)

It should be noted that logging is not the only activity responsible for the vast network of roads in National Forests. According to the Daily Courier in Grants Pass, OR, "of the road construction projects planned for 1999 in Oregon and Washington, 25 were for minerals, three were for recreation, and only one was for timber." Because the main thrust of this rulemaking is to protect roadless areas from degradation caused by roadbuilding, the inclusion of mining exploration in a roadbuilding ban, prior to the establishment of a valid existing right, is reasonable and legal. (Environmental/Preservation Organization, Nevada City, CA - #50392.90320)

Public Concern: The Forest Service should limit access to mining claims in inventoried roadless areas to non-motorized methods or helicopters.

Access to mining claimants for the purposes of mineral exploration, prospecting, mining or processing operations on the National Forests can and should be limited to non-motorized methods or helicopter access (where necessary) in inventoried roadless areas or that overland access can and should be denied where it would impact other values such as those found in roadless areas. (Environmental/Preservation Organization, Cave Junction, OR - #16188.64150)

Public Concern: The Forest Service should allow only small-scale mining by hand.

I would definitely oppose large-scale mining…in these [roadless] areas because of the outright, undeniable damage that occurs. Proposed solution: allow only mining by hand and riffle washes, panning or other such methods by individuals or families of not greater than five persons. (Individual, The Dalles, OR - #7374.61300)

Public Concern: The Forest Service should prohibit strip mining.

Strip mining is perhaps the only activity I have ever witnessed that is more offensive than the environmental damage caused by the reckless creation of these greed motivated arteries. (Individual, Denver, CO - #4111.93500)

Public Concern: The Forest Service should not allow recreational placer mining.

State that recreational placer mining, which is not an economically viable mine, is not required by the 1872 Mining law and therefore not allowed in roadless areas. (Environmental/Preservation Organization, Rapid City, SD - #52237.93500)

Public Concern: The Forest Service should consider all available means of restricting mineral leases, including lease expiration and prohibition of communitization agreements.

As a general matter, roadless areas must not be "held hostage" to mineral rights within their borders. While we recognize certain limitations in addressing private mineral rights on national forests, we recommend the following principles be included in the final roadless area policy. First, no new mineral leases should be offered in inventoried roadless areas. Second, existing leases in inventoried roadless areas should be allowed to expire whenever possible. More specifically, the Forest Service, in coordination with the Bureau of Land Management, should review "capable of production" standards as applied to leases in roadless areas and extinguish leases no longer capable of production. In addition, existing leases within roadless areas should not be subject to communitization agreements unless all leases covered by the agreement are located entirely within the roadless area. (Environmental/Preservation Organization, Chapel Hill, NC - #52231.90320)

Public Concern: The Forest Service should utilize its authority to withdraw roadless areas from mineral entry.

To protect roadless areas from mining the Forest Service should:
1. Recommend to the BLM that they withdraw all roadless areas from mineral entry where there is a threat of mining or of the filing of nuisance claims. (Environmental/Preservation Organization, Beaverton, OR - #52230.93500)

We oppose hard rock mining, oil and gas drilling, and other mineral development in roadless areas. Mining has the potential to impact all of the ecological and amenity values of roadless areas--from water quality to solitude. Mining access roads are as destructive as logging roads and are often driven deep into the most remote roadless area watersheds. Mine sites become permanent scars on the land. While the proposed road construction ban would effectively curtail at least some new oil and gas drilling, it would not limit hardrock mining conducted under the General Mining Law of 1872. We urge the Forest Service to utilize its full legal regulatory authority to protect roadless values. Areas that are threatened by mining should be segregated and withdrawn from mineral development, pursuant to Section 204 of the Federal Lands Policy and Management Act. (Environmental/Preservation Organization, Eugene, OR - #55101.93500)

Mineral withdrawal procedures should be instituted whenever possible in all the remaining roadless areas of 1,000 acres or more. Full consideration should be given to instituting formal mineral withdrawal procedures at the national level. If that is again deemed inappropriate or too onerous a task, then each Regional Forester and Forest Supervisor should be directed to undertake an immediate analysis of each forest's roadless areas with the goal of withdrawing from mining all areas that have any potential for ecologically destructive mining activities. (Individual, Prescott, AZ - #8486.93510)

I endorse withdrawal of mining rights from all inventoried roadless and other roadless areas. (County Elected Official, Hilo, HI - #13967.64150)

MODIFY SECTION 294.13 TO REQUIRE CONSIDERATION OF MINERAL WITHDRAWAL IN IMPLEMENTATION PROCESS

The DEIS states that impacts to roadless values from mining can be severe and that mineral withdrawal for specific roadless areas could be proposed through implementation of procedural alternatives at the local level. DEIS at 1-18. The DEIS discloses that there are presently 31 mineral exploration and development projects in inventoried roadless areas. DEIS at 3-142 & 143. We propose that [the] following language be added to the final roadless area conservation rule under § 294.13. "At the time of land and resource management plan revision and during project level analysis inventoried roadless areas and unroaded areas shall be considered for mineral withdrawal where mineral exploration and mining operations threaten roadless area integrity and values." (Environmental/Preservation Organization, Washington, DC - #52802.93500)

…the Forest Service should consider "mineral withdrawals" for roadless areas in special circumstances. Such circumstances might include a perceived threat to a certain roadless area or areas. In addition to including these recommendations into the final policy, they should also be incorporated into individual forest plans in the Southern Appalachians during the ongoing revision process. (Environmental/Preservation Organization, Chapel Hill, NC - #52231.90320)

Public Concern: The Forest Service should develop regulations for "grandfathered" mining claims in roadless areas.

Develop Forest Service regulations for "grandfathered in" mining claims in roadless areas. (Individual, Sheridan, WY - #10616.90300)

I recommend that [the] BLM withdraw all roadless areas from mining entry. I suggest that [the] Forest Service develop regulations for "grandfathered in" mining claims in roadless areas. Regulations should require proof of a valid existing mining claim, and proof of a valuable mineral deposit. (Individual, No Address - #10487.93500)

Public Concern: The Forest Service should purchase all mineral rights on National Forest System lands to stop oil and gas and hard rock mining.

On page 3-144, the FS ignores the impacts on RA's where mineral rights are not owned by the U.S. The FS should implement a program immediately to buy all mineral rights on National Forests to stop oil and gas and hard rock mining from devastating the "People's Forests." (Environmental/Preservation Organization, Bellaire, TX - #13951.93500)

To protect roadless areas we must:
All current mining operations in roadless areas should be discontinued and claims eliminated through public purchase at fair market value. (Individual, Bend, OR- #12893.93500)

Public Concern: The Forest Service should protect specific roadless areas from mining activity.

THE SAND CREEK AREA

Please protect the Sand Creek Area from mining. (Individual, Sheridan, WY - #10616.90300)

Public Concern: The Forest Service should address whether track-mounted core drills will be allowed to travel cross-country in inventoried roadless areas.

Would track-mounted core drills be allowed to travel cross-country in IRAs? (Individual, Pocatello, ID - #2959.93500)

Public Concern: The Forest Service should adequately address oil and gas operations in the draft proposal.

Oil and gas operations are not adequately addressed in the draft proposal. (Individual, Escalante, UT - #1510.93540)

Both the President and the Vice-President have been vocal supporters of increased production and utilization of clean burning natural gas as a more environmentally acceptable alternative to other fuels which produce more air pollution and acid rain. However, the draft EIS does not disclose the environmental benefits which will be lost by locking up vast reserves of natural gas (See DEIS at 3-196) by prohibiting access to those reserves. The final EIS should contain a discussion of the impacts of the proposed rule on the Administration's goals for promoting the use of clean natural gas. (Individual, Denver, CO - #29016.93540)

Public Concern: An exception for leasable mineral development should be allowed in the final rule.

The roadless concept is a good idea with exceptions: Since oil is necessary for national security, we should allow for oil exploration and inventory on these lands. (Individual, Cody, WY - #1813.93540)

The development of leasable minerals is a Forest Service decision. Once the proposed rule is in place, the Forest Service could not implement a decision contrary to Section 294.12. If the Forest Service is unwilling to include leasable minerals in the exceptions, Churchill County is opposed to any retroactive prohibition to development activities unless adequate mitigation measures are negotiated with affected parties and included in the Record of Decision as committed mitigation. (County Elected Officials, Fallon, NV - #17290.93510)

I recommend that the Forest Service address the status of contractual rights of access to mineral resources in the text of the Proposed Rule itself. Specifically, § 294.12 (b) should be revised to make clear that the prohibition on road construction and reconstruction in inventoried roadless areas does not apply where a road is reasonably necessary pursuant to oil and gas leases granted, previously or in the future, by the U.S. government. At minimum, the Forest Service should revise § 294.12 (b) to clarify that the prohibition on road construction and reconstruction does not apply where a road is reasonably necessary pursuant to existing oil and gas leases. (Individual, No Address - #52188.50000)

This section [294.12 (b)(3)] needs to be clarified, particularly with respect to mining claims. The analysis of the proposed rule indicates that road construction and reconstruction would be permitted for valid existing rights…under the General Mining Law of 1872. It is unclear whether roads would be permitted for claims filed after the proposed rule. The rule should be changed to clearly reflect the Forest Service's intent with respect to locatable minerals. The development of leasable minerals should also be included under this section as an exception. (County Elected Officials, Fallon, NV - #17290.53600)

For leasable minerals, the DEIS, page 3-145 states that, "Construction and reconstruction of roads considered reasonable and necessary for energy or mineral development on existing leases would be allowed as necessary to fulfill the terms of the lease." There is one very large problem with the statement, "on existing leases" doesn't allow for access TO the lease. If the rule is adopted it must state that access to, from, on and under the

lease is allowable to extract and move the resource to a processing point. (Individual, Lava Hot Springs, ID - #18244.93510)

It is our fear that where you are heading with your proposal is down the path of no new development under the guise of environmental righteousness, rather than giving access to valuable potential resources that can be produced in an environmentally sound manner. You are not only denying permits on federal land you are initiating policy to prevent access to forest land specifically by preventing road construction.
In conclusion without sound policies that support domestic production of oil and gas, our industry will never meet its potential and the county will be the worse because of it. We request the opportunity to work together with you beyond this public hearing aspect, in order to help develop a stable oil and natural gas development framework on federal forest lands. (Mining/Oil Company or Organization, Lansing, MI - #17666.93510)

NORTH DAKOTA GRASSLANDS

The Roadless Initiative will adversely affect oil production activity in the North Dakota Grasslands by restricting future oil production. In addition to drilling rigs, pipelines and other utility corridors will not be allowed if road construction is necessary for installation. (Mining/Oil Company or Organization, Mandan, ND - #13610.93540)

This “one-size fits all” regulation was written without taking into consideration the economic interests of ranchers, the oil industry and the State of North Dakota. The Roadless Initiative, if implemented, will have a devastating impact on the future of oil activity in the North Dakota Grasslands. THE DECREASE IN THE SUPPLY OF CRUDE PLACES THE FUTURE OF THE MANDAN REFINERY AT RISK. (Mining/Oil Company or Organization, Mandan, ND - #13610.93730)

TARGHEE NATIONAL FOREST

The proposal for roadless areas to be closed off is wrong. Let’s stop this proposal. God gave us this land for our use. Roadless areas should be utilized for recreation, timber harvest and replanting. Think science. Private business has been harmed by similar action. Targhee oil drilling should be allowed. Current forest area is greater now than 50 years ago. Balance needs to be maintained in lands of many uses. I read that environmentalists are against private property rights and other God given rights. (Individual, Idaho Falls, ID - #18243.10200)

Public Concern: The Forest Service should consider allowing oil and gas development on a carefully controlled basis.

Oil and gas development should be considered on a carefully controlled basis given the very minor footprint which it has been proven it can be controlled to. (Individual, East Alton, IL - #6649.10110)

Public Concern: The Forest Service should limit the amount of methane wells allotted on a certain amount of acreage.

Methane should have been looked into before so many wells were drilled.
Water is precious lets not disturb any more of it.
A limit of Methane wells should be allotted on a certain amount of acreage.
And the water from the wells should stay on the property of the well owners. Not flow down onto your neighbor’s property. (Individual, No Address - #15537.93540)

Public Concern: Oil and gas development should not be allowed in the national forests.

The policy should permanently and immediately halt all roadbuilding, all timber sales, and all other activities--such as off-road vehicle use, grazing, mining, and oil and gas development--that would degrade roadless areas. (Individual, Eugene, OR - #634.10100)

Public Concern: A shortcoming of the Preferred Alternative is that it does not preclude oil and gas leasing, but does restrict road access for any new leases in roadless areas.

While I am generally quite happy that such a proposal is moving forward--I do want to point out some shortcomings, especially with the preferred alternative. They are as follows: It does not preclude oil and gas leasing, but does restrict road access for any new leases in roadless areas. (Individual, Salt Lake City, UT - #10770.93540)

6.3.8 Alternative Resources and Energy Sources

Many people believe the Forest Service should promote the usage of alternative sources of energy such as wind and solar powered energy. Others feel alternative materials as substitutes for traditional wood products should be encouraged. "I would urge the Forest Service to use recycled paper for all of their reports--and look into the possibility of using hemp paper where appropriate," states one individual. Another individual encourages the Forest Service to print the Final EIS on 100% post-consumer recycled paper. Additionally, respondents emphasize the importance of using alternative building materials, such as, pumice, steel, brick, and wood laminate/foam mixes. Many individuals favor a pro industrial hemp policy.

Conversely, some respondents believe there will be adverse environmental impacts from the increased use of wood fiber alternatives. They fear that increased demand for cotton or hemp would cause more erosion, and more fertilizer, pesticide, and herbicide usage. One individual states, "Wood used for building materials could be replaced by steel, which would result in more steel mines. Yeah right!!! Plastic could also be used but that would result in the production of more chemicals. More toxic gasses would be released when these homes burned in forest fires too." Another individual counsels the Forest Service "to keep clearly in mind that forests are a super-resilient, totally renewable solar-grown natural resource and that wood is the most environmentally friendly building product known to man."

Public Concern: The Forest Service should promote alternate sources of energy.

You must keep our forests roadless, protect them from off-road vehicles, wasteful harvesting, and promote solar energy and wildlife and plant conservation. (Individual, New Hartford, NY - #2947.10110)

The gas oil, and electric companies are destroying our forests as fast as the rest of the companies….Instead of using our fossil fuels, the United States has to go to solar power and wind power. (Individual, Greenville, WI - #646.93540)

Public Concern: The Forest Service should promote alternative materials as substitutes for traditional wood products.

I would urge the Forest Service to use recycled paper for all of their reports--and look into the possibility of using hemp paper where appropriate. Stop using trees for paper. (Individual, Klamath Falls, OR - #1266.93341)

A 1% reduction in the wood products that we use is a small sacrifice to pay to protect the remnants of our last roadless areas. It could be accomplished by simply printing the final EIS on 100% post-consumer recycled paper. (Environmental/Preservation Organization, Roseburg, OR - #52494.93341)

I believe that we can do better in terms of wood usage by better management of commercial nurseries, as well as better and more comprehensive recycling measures. These may increase our costs of paper and wood but I feel that our forest wilderness is priceless. (Individual, Mill Valley, CA - #2164.93340)

We need to encourage more recycling and save our trees. We waste too much paper as napkins, paper towels and tissues. Cloth can be used and then washed. (Individual, Pocono Lake, PA - #3873.93341)

We must stop this madness! There are other resources we could be using if the government weren't suppressing it. (Individual, Port Huron, MI - #3062.93341)

Logging does not have to continue. There are too many resources available to use for paper and other products that come from trees. There is industrial hemp, henna, soy beans, and etc. etc. All of these plants grow quickly, but at the same time, we consume way too much and we need to cut back on our awful consumption and start to fundamentally change our consciousness to make the world work for all of us, not just for a few. It is up to all of us, but at this point, you, to make this fundamental change at the national level by ending all logging in all national forests and end logging throughout the world as well. This has existed for too long and it cannot continue on for any longer. It is time that we change our ways for the future of this planet, earth. (Individual, Knoxville, TN - #5560.93340)

ALTERNATIVE BUILDING MATERIALS

Please save the forests. Instead of timber, we can use pumice-crete to build housing. It is more eco-friendly. (Individual, Oak Park, IL - #3778.93341)

Enough is enough. Building is now using a great deal of steel in framing, so the need for wood is not in such demand. (Individual, San Francisco, CA - #25577.93341)

There is no reason that more brick can't be used in construction or that combinations of wood laminate and foam could not become a more common building material. (Individual, Ogden, UT - #445.93341)

Public Concern: The Forest Service should adopt a pro industrial hemp policy.

The Forest Service could help lessen the demand for wood by adopting a pro industrial hemp policy. (Individual, No Address - #405.23000)

It is my understanding that using hemp (which is not a drug but a textile, paper, clothing and fuel source), that grows in 100 days as much source fiber as a 50 to 500 year old tree. Also it takes no pesticides to grow hemp and some is very oxygenating as there have been shown links to ozone repair from abundance of oxygen.

Hemp is also completely mold, mildew and termite resistant, unlike wood. There are many uses for this crop and it can save forests. Please work to implement the use of hemp as a serious replacement for logging. (Individual, No Address - #1793.93341)

Why isn't hemp, which is easy to grow and does not require bleaching, used instead of ancient trees? It could save so much of our treasured forests, why not promote that and save what is left? (Individual, Boca Raton, FL - #3396.93340)

Public Concern: The Forest Service should consider the environmental impacts of increased use of alternatives to wood fiber.

Cotton or hemp could be used for paper. The increased demand for these products would result in more acreage being tilled and exposed to erosion. More fertilizer, pesticides and herbicides would be required to produce these crops and we all know what that can do to our water resources. There would be an increased need for fossil fuels to power the equipment (global warming, acid rain). With the increased use of computers and the internet resulting in a high demand for hydro-electric power (more dams) or fossil fuels (global warming, acid rain). Wood used for building materials could be replaced by steel, which would result in more steel mines. Yeah right!!! Plastic could also be used but that would result in the production of more chemicals. More toxic gasses would be released when these homes burned in forest fires too. (Individual, No Address - #197.72400)

For the sake of countless rural families and communities in your country, I urge you to keep clearly in mind that forests are a super-resilient, totally renewable solar-grown natural resource and that wood is the most environmentally friendly building product known to man. (Individual, BC, Canada - #7647.93300)

6.3.9 Utility and Water Delivery System Permits and Infrastructure

Public officials request the Forest Service develop a cumulative effects section to describe the effects of the proposed rule on public utility infrastructure. Other respondents are more specific, requesting a decision be issued by the Forest Service to reroute Collier Hollow Road #2780 so that utility installation can proceed.

Many respondents claim that the proposed rule should not interfere with the building, maintenance, or operation of water holding and delivery systems and electrical facilities. The Forest Service should allow access for the maintenance of water and utility infrastructure to protect public health and safety. One state elected official advises dam safety can affect "the safety of millions of people across the country who could be living, and working in the path of a potential dam failure." Others request access to electrical facilities. They point out that "a loss of electricity can shut down necessary heating, cooling, food refrigeration, lights, and other functions, posing health and safety risks. Furthermore, if a utility cannot access its facilities, for example to remove a downed tree from a live electric wire, this can pose a fire or other danger to the local environment and even to adjacent property." Additionally, several respondents point out that the Forest Service should allow access to stream gauges, climate stations, and snow survey data sites (SNOTEL).

Conversely, several writers believe the Forest Service should prohibit new human developments and water projects. Some citizens feel dams and any other "harmful activities" should be prohibited.

Public Concern: The Forest Service must develop a cumulative effects section to describe the effects on public utility infrastructure.

Page 3-141--There is no cumulative effects section for Real Estate Management. The reader is left with no sense of how special use holders, both with and without current "valid existing rights" will be affected over time by the "Proposed Action." The questions that must be addressed are: How will new applications and proposals for electronic sites, municipal water reservoirs, irrigation diversions, etc. be handled under the prohibitions? How will existing permits be handled? What effect will these have on local communities that rely on these uses for administration and providing services to the public?
Relief: The Forest Service must develop a Cumulative Effects section for this and address the questions presented. (County Elected Official, Worland, WY - #16185.90300)

Public Concern: The Forest Service should issue a decision to reroute Collier Hollow Road #2780 so that utility installation can proceed.

Would like USDA to finish their decision of Collier Hollow RD #2780 after four years delay. This project is holding up utilities from being installed. (Individual, Cola, FL - #1372.71130)

Public Concern: The roadless area rule should not interfere with the building, maintenance, or operation of water holding and delivery systems.

We need ACCESS TO WATER. Water developers must not be impacted by new regulations. We, whether private or public, must continue to have access to maintain, improve, operate, and develop water resources. Roads give us this access. (Individual, West Point, UT - #4008.90333)

An across-the-board ban on new or reconstructed roads in areas that are currently roadless in these basins could severely impact Denver Water's ability to implement an environmentally sound, comprehensive long-range plan to meet the future water demands of the population here. We are currently working with the U.S. Forest Service in Colorado to get the roadless areas on GIS so that the extent of these possible impacts can be determined. (Utility Group or Organization, Denver, CO - #43413.90333)

It is better to permit required maintenance activities to occur as needed, rather than to have to hurriedly build a road to deal with "an imminent threat of flood, fire, or other catastrophic event..." as anticipated in 294.12-b-1. (State Elected Official, Salt Lake City, UT - #43918.90333)

Roadless issues that have been raised are as follows:
*Access to monitor, maintain and repair storage and conveyance facilities. NOTE: The projects held by the Board of Water Resources is a very small part of the total storage and/or conveyance facilities in the roadless area. The local water entities need to identify their own facilities and the "road" they presently use in these roadless areas to access their projects.
…*Opportunity for future water development should be allowed. NOTE: Growth will continue and water development may be needed in many areas of the state. There will be cases where the most reasonable source of this needed supply is in these roadless areas. This opportunity should not be ruled out. (State Elected Official, Salt Lake City, UT - #43918.90333)

It appears that the Forest Service has also not completed a study of the water rights in the proposed roadless areas and the impact of closing roads on these water rights. Private Irrigation Companies and Individuals have previously been damaged by establishing improper wilderness boundary lines which include irrigation and culinary water sources inside the Mt. Nebo Wilderness areas. When considering closing roads, the Forest Service must be more cautious to allow motorized access for maintenance of such systems which is afforded by roads. Therefore, Juab County requests copies of maps, studies and other documentation detailing and

describing what studies or analysis has been performed on existing water rights, water systems and the related proposed road closures. (County Commissioner, No Address - #47983.90300)

There are still undeveloped springs that are needed by our local communities for culinary water that we need access to. We also need the ability to maintain and repair existing collection points and systems. (County Agency, Manti, UT - #43734.90332)

There are a number of water rights that have been issued that allow direct diversion, trans-basin diversion or storage within National Forest lands in Wyoming. If the facilities fall within a roadless area, the State Engineer's office staff and owner must still be allowed access to the facility for regulation, operation and maintenance. (State Elected Official, Cheyenne, WY - #2816.90333)

ALLOW ACCESS FOR MAINTENANCE TO PROTECT PUBLIC HEALTH AND SAFETY

The following is a quote from the May/June issue of the Association of State Dam Safety Officials newsletter. "There is an alarming lack of public support and education about the need for proper maintenance and repair. Dam safety is not a glamorous issue, unless a dam fails. But, it is one that affects the safety of millions of people across the country who could be living, and working in the path of a potential dam failure. If dams fail, people can die and property can be destroyed." If [the] proposed rule is not modified to allow this access, the Forest Service should be prepared to accept the financial liability from any resulting structural failures. Further, if the Forest Service allows these structures to deteriorate to the point where they become useless, the Service should compensate owners for the administrative taking of the water rights. (State Elected Official, Salt Lake City, UT - #43918.90333)

Public Concern: The proposed rule should not interfere with the building, maintenance, or operation of electrical facilities.

PROPOSED SECTION 294.14--SCOPE AND APPLICABILITY--IMPACT ON EXISTING SPECIAL USE AUTHORIZATIONS This section states that road construction or reconstruction associated with ongoing implementation of long-term special use authorizations would not be prohibited. However, the proposed wording in this section specifies existing ski areas as the example of such authorizations. SCE [Southern California Edison] wishes to clarify that other special uses are also subject to this authorization, and requests the inclusion of utility distribution and transmission facilities in the description of long-term special use authorizations. While sections 294.14 and 294.12(b)(3) and the preamble discussion provide some comfort that existing permitted uses and affiliated roads would remain authorized, the text and preamble are not as clear as they might be on these points, and so raise concerns. (Utility Group or Organization, Rosemead, CA - #29792.64353)

In the interest of avoiding any ambiguity, the USFS should explicitly refer to "hydroelectric generation facilities and surrounding project lands, energy transmission and delivery facilities, and other utility facilities, rights-of-way, and corridors" as types of current and future authorizations that remain intact under its road regulations. In addition, the USFS should recognize that permits or other authorizations may not completely reflect each road or access-way needed to construct operate, repair, and maintain such facilities. If a road is needed to get to an authorized facility, then USFS rules need to accommodate such a road, even if it would be a new road in an unroaded area or if it is an existing road that has not yet been recognized as a "classified road." (Utility Group or Organization, No Address - #43417.90320)

The Proposed Rule on roadless area conservation may adversely effect AEP's statutory obligation to provide reliable electric service throughout its service territory, by precluding construction of new power lines and hampering AEP's ability to inspect and maintain existing power lines and communication facilities within certain national forest lands. The Proposed Rule would establish a federal regulatory prohibition on road construction and reconstruction in designated "unroaded portions of inventoried roadless areas." With limited exceptions, Forest Supervisors would have no authority to permit road construction or reconstruction in these

areas, even if such authorization would be consistent with applicable statutory criteria. In this manner, the Proposed Rule impermissibly limits the authority of the Forest Supervisors and other local decision makers, who are bound to make land use decisions based on applicable law. (Utility Group or Organization, No Address - #43981.90332)

Notwithstanding this statutory mandate, a number of national forests, particularly those east of the Mississippi River, to date have failed to identify appropriate corridors in forest plans. AEP believes it is in the interest of agencies with jurisdiction over federal lands to identify utility and transportation corridors in long-range strategic planning documents, including forest plans. Long-term planning is environmentally preferable because it encourages co-location of linear special uses, such as those for electric transmission lines, natural gas pipelines, and transportation projects, and minimizes the proliferation of separate rights-of-way. It is infeasible, however, to locate a linear special use without access roads being available to support construction, maintenance, and repair of the facilities installed within the right-of-way. Consequently, the nationwide prohibition in the Proposed Rule would effectively preclude the subsequent designation of utility corridors throughout potentially vast areas of currently unroaded forest lands, without consideration of all the statutory criteria in FLPMA. In many densely populated areas in the east, these unroaded areas may be the areas that best satisfy all the FLPMA statutory criteria for utility corridor designation.
…The Secretary of Agriculture, with respect to lands within the National Forest System...is authorized to grant, issue, or renew rights-of-way over, upon, under, or through such lands for...systems for generation, transmission, and distribution of electric energy...[and]…such other necessary transportation or other systems or facilities WHICH ARE IN THE PUBLIC INTEREST and which require rights-of-way over, upon, under, or through such lands. (Utility Group or Organization, No Address - #43981.90332)

The DEIS also fails to consider impacts to maintenance and repair of existing facilities in roadless areas. AEP performs vegetative maintenance on rights-of-way every 3 to 5 years, or as needed, to cut brush and danger trees. Likewise, structural and conductor maintenance is based on the results of aerial or climbing inspection. While helicopters can be used for some conductor (wire) maintenance procedures, their use is limited by terrain, right-of-way vegetation and width. Therefore most transmission line maintenance must be performed by a line crew accessing the site and climbing the tower. For the minimal amount of helicopter maintenance that can be performed, it can only be accomplished during ideal weather conditions in order to have proper stability and visibility to safely guide the aircraft. The reality is that when the transmission lines typically go out of service, it is generally during bad weather. In such instances, AEP must not be restricted to helicopter maintenance in roadless areas because timely service restoration time would be precluded with associated public health and safety implications.
...Finally, it is important to note that unstable slopes (landslides) and/or foundation problems cannot be remedied by means of a helicopter. A landslide that occurs after a line is constructed must be corrected by road access. (Utility Group or Organization, No Address - #43981.90332)

BY INCLUDING UTILITY MAINTENANCE IN THE EXCEPTION FOR PUBLIC HEALTH AND SAFETY

Section 294.12(b)(1) of the proposed rule would allow a road in an unroaded area if the responsible official determines that: "A road is needed to protect public health and safety in cases of an imminent threat of flood, fire, or other catastrophic event that, without intervention, would cause the loss of life or property." The exception is too narrowly drawn. It should be expanded also to cover roads used for the operation, repair, and routine maintenance of electric and other utility infrastructure, because such roads are equally necessary for the protection of public health and safety. Furthermore, the issue before the responsible official should be the specific routing of the road and conditions to avoid or reduce its environmental effects, not whether such access roads will be permitted.
If an EEI member or other utility is unable to access existing electricity generation or delivery facilities for operation, repair, and maintenance, and as a result those facilities go out of service, the customers who rely on the electricity can be put in jeopardy. A loss of electricity can shut down necessary heating, cooling, food refrigeration, lights, and other functions, posing health and safety risks. Furthermore, if a utility cannot access its facilities, for example, to remove a downed tree from a live electric wire, this can pose a fire or other danger to the local environment and even to adjacent property. Therefore, EEI requests that the USFS expand the "public health and safety" exemption to accommodate roads needed for access to utility facilities, whether or

not such roads have already been built or recognized as "classified roads." (Utility group or Organization, No Address - #43417.90000)

Public Concern: The Forest Service should allow access to stream gauges, climate stations, and snow survey data sites (SNOTEL).

Roadless issues that have been raised are as follows:
*Access to stream gauges, climate stations and snow survey data sites is very critical.
…Stream gauges are funded 50 percent by the Division of Water Resources, the Division of Water Rights, or other Utah water entities. Almost all of this data, however, is collected by federal agencies. The data is critical to both state and federal agencies to administer the Bear River and Colorado River Compacts, plan for the proper storage and release from reservoirs for maximum dam safety and for the ongoing planning to manage and develop, when necessary, additional water resources. The SNOTEL and Snow Data Measuring sites are critical for Utah's Cloud Seeding Program. (State Elected Official, Salt Lake City, UT - #43918.90333)

Public Concern: The Forest Service should prohibit new human developments and water projects.

…If roadless area characteristics associated with Wildlands Values (DEIS 3-161), many of which are recognized and valued by the American Public, are to be preserved, the following management guidelines must be adopted:
…New human developments and water projects prohibited. (Environmental/Preservation Organization, Albuquerque, NM - #43737.90240)

This new policy should provide permanent protection for ALL roadless areas from road construction and reconstruction, all logging, mining, grazing, oil and gas development, dams, off-road vehicle use and other harmful activities. (Environmental/Preservation Organization Albany, OR, - #6506.10100)

6.3.10 Ski Area Permits

Many people raise concerns about ski area expansion, and many comment on the effects of the proposed rule on specific current and proposed ski areas operated on National Forest System lands. Respondents ask the Forest Service to clarify the effects of the final rule on existing and future ski area operations. Several business/business associations ask that ski resort boundaries operated under a current master development plan be exempted from prohibitions in the final rule. Others suggest the Forest Service exempt ski areas with approved records of decision from the proposed rule.

One individual is concerned that that the proposed rule will effectively modify current Inyo National Forest special use permits in favor of the Mammoth Mountain Ski Area. Many others express either support or opposition to the Pelican Butte Ski Area proposal. Some feel that the planning process for the proposed Pelican Butte Ski area should continue unimpeded. Contrary to the conclusion in the Draft EIS, the Pelican Butte Ski Area would provide more dispersed recreation opportunities than an undeveloped Sky Lakes B roadless area, supporters assert. Supporters of Pelican Butte request exemption from the final rule for a wide variety of reasons, citing support for an exemption from members of congress, local businesses and residents; an ongoing planning process initiated by the Winema National

Forest; and the economic and recreational opportunities the ski area may provide to the region. Opponents of the ski areas request that the final rule kill the project because of decreasing skier and snowboarder numbers, the bad precedent that an exemption would set, and unacceptable environmental impacts. Likewise, respondents express either support or opposition to the expansion of the White Pass Ski Area into Hogback Basin.

Other respondents state the Forest Service should not allow any ski area construction or expansions. Many feel that there are already ample opportunities for the snowriding public on National Forest System lands and that current skier and snowboarder demand is flat. "I urge you to not increase area of existing ski areas, and do not start any new ones on USFS land," writes one citizen. Many feel the final rule should not create special exemptions of any kind for new ski area construction or expansion of current areas. One recommendation is for the final rule to prohibit proposed ski areas and ski area expansions that did not have a record of decisions signed by October 13, 1999.

Finally, some helicopter skiing operation permit-holders request that the Final EIS explicitly state that helicopter skiing is a suitable dispersed recreational activity in designated roadless areas.

Other concerns addressing ski areas are found in Chapter 4 and in Appendix B.

Public Concern: The Forest Service should clarify the effects of the final rule on future ski area operations.

We need additional time to determine the impact of the Proposed Rule on future ski area operations. There are conflicting descriptions of the effect of the Proposed Rule on ski areas. The Forest Service states that ski area operations could expand into inventoried roadless areas so long as it did not require the construction or reconstruction of roads. DEIS at 3-131. Elsewhere the DEIS states that ski area operations could not expand into inventoried roadless areas unless it is approved before the Proposed Rule is finalized. ID. at 3-172. Moreover, it is unclear exactly what type of activities associated with the expansion of a ski area fall within the prohibition on the construction or reconstruction of roads. (Business, Vail, CO - #13956.31300)

Comment: Page 3-12--The portion of this section that discusses expansion of ski areas, resorts, and other recreational developments only addresses those that are currently under permit or have an existing decision for expansion. It does not discuss what the decision is for newly proposed ski areas, resorts, or other recreational developments.
Relief: The Forest Service must disclose the disposition of new special use proposals as part of the "Proposed Action." (Town or Municipality/Municipal Association, Cheyenne, WY - #15902.90330)

Resorts that obtain approval should be able to make improvements outside of permitted boundaries if no road construction is needed or if roads already exist in roaded portions of IRA's. The proposed rule should be modified to clearly state that the policy pertains only to road construction/reconstruction and that ski area expansion outside of permit boundaries into IRA's could be authorized if there is no road construction needed. (Business/Business Association, Mammoth Lakes, CA - #44001.90330)

The Forest Service has stated that the prohibition in [section] 294.12(a) would not prohibit new ski area development in unroaded portions of inventoried roadless areas so long as it does not require the construction or reconstruction of roads. DEIS at 3-130 to 3-131. As discussed above, this is consistent with the understanding of the Vail Resorts because potential expansion of ski operations at our existing ski areas would not involve road construction or reconstruction and therefore would not be subject to the prohibitions of the Proposed Rule.

However, there is some ambiguity because the DEIS elsewhere states that "expansion beyond existing boundaries, and new ski developments are not likely to be allowed under the prohibitions unless a decision to approve them is made prior to rule implementation." DEIS at 3-172. This latter language should be stricken because it is contrary to the Forest Service's statements that the proposed [section] 294.12(a) will not prohibit the construction, clearing of timber for, and use of ski runs, ski trails, and ski ways in present or future special use permit areas that does not involve the construction or reconstruction of roads. (Business/Business Association, Vail, CO - #29747.90331)

A comment that is put forth in the DEIS is that "activities and constructed features of ski area development and management are primarily consistent with Rural and Urban ROS classes." The document goes on to discuss the "sharp contrast," the "inconsistency with management of IRAs," and the controversy associated with further expansion, thus "FS lands will no longer be a reservoir for future ski areas." Most ski areas have been in place for 40 or more years and the vast majority of them operate on National Forest lands. The areas existed before the Wilderness Act, before the RARE II process, before the requirement for Forest Plans, and yet it is ironic that it is the ski area that no longer fits in its allocated setting.
In many parts of the west, it has been the FS that has created many of the ski area related communities as a result of the initial permit authorization and then subsequent land exchanges. It is unacceptable for the FS to be instrumental in the development of planning and establishment of the industry, and now to all of a sudden change management strategies so significantly. Creating higher densities at existing developed sites will be disastrous from a planning and safety perspective. The Forest Plans identified these concerns and that planning outcome needs to be incorporated into the final version of this proposal. (Business/Business Association, Mammoth Lakes, CA - #44001.90331)

Public Concern: Ski resort boundaries operated under a current master development plan should be exempted from prohibitions in the final rule.

Developed recreation sites play a critical role in the multiple use strategy of the forests. Each year millions of visitors ski and snowboard at resorts on national forest land. It is our belief that many of these visitors would not take advantage of these opportunities if it were not for the convenience afforded by the resorts. Ski resort operators know that their livelihood depends on protecting and enhancing the environment permitted them through the Special Use Permit process. All resorts on federal land work closely with their local Forest Service staff in order to treat the land with respect for not only our generation but the generations to come as well. BECAUSE OT THIS, WE REQUEST LANGUAGE BE INCLUDED IN THE FINAL DRAFT OF THE ROADLESS DOCUMENT WHICH WOULD STIPULATE THAT 'ALL NATIONAL FOREST LAND THAT IS CURRENTLY OPERATED UNDER A SPECIAL USE PERMIT OR A MASTER DEVELOPMENT PLAN BE EXEMPTED FROM ROADLESS CONSIDERATION.' (Business, Lake Tahoe, CA - #2113.90331)

FIRST, the Forest Service could add a provision to [section] 294.12 that states:
The prohibition in paragraph (a) of this section does not apply within existing or future special use permit boundaries of existing ski areas. This language is intended to exempt authorized existing and future special use permit boundaries of existing ski areas from the prohibition on the construction or reconstruction of roads in [section] 294.12(a) of the Proposed Rule. (Business/Business Association, Vail, CO - #29747.90331)

Public Concern: The Forest Service should exempt ski areas with approved records of decision from the proposed rule.

I am writing in SUPPORT of the Draft Roadless Initiative; specifically relief for ski areas with approved Records of Decision. Our love of the outdoors and our ability to enjoy an improved ski area at White Pass will be effected by the regulatory relief sought for all 800 acres of Hogback Basin. This is a small potential ski development area found not to have outstanding wilderness attributes, but it does deserve to be opened up for use and enjoyment by families such as ours. (Individual, No Address - #16911.90331)

Public Concern: The Forest Service should address the fact that the proposed rule will effectively modify current Inyo National Forest special use permits in favor of the Mammoth Mountain Ski Area.

Current Special User Permits (SUP) in effect for MMSA [Mammoth Mountain Ski Area] within the INF [Inyo National Forest] include Mammoth Mountain Ski Area, June Mountain Ski Area, Tamarack Resort and Cross-Country Skiing Center, and Mammoth Snowmobile Adventures. As with the INF Forest Plan… the impact of the Decision will have the effect of modifying or amending all of the SUPs in favor of MMSA. (Individual, Mammoth Lakes, #13994.90331)

Public Concern: The Forest Service should allow the proposed Pelican Butte Ski area to continue to be studied.

From what I am hearing in the media and reading in the news, the proposed Pelican Butte ski area is dead on arrival, a result of the proposed 43 million acre roadless plan. If this is true, it is an absolute outrage. At this stage we are not debating whether the project should be built but rather will the study be allowed to continue. Pelican Butte has been left out of all other proposed lockups, so why now? Jeld-Wen has already invested millions of dollars and tens of thousands of man hours in good faith that the proposal would be decided on its merit instead of a technicality. This project has had local support for over 30 years and the comment period last year enjoyed 70% “in favor of” nationwide. Jeld-Wen has said from the beginning they would do everything possible to make this project environmentally friendly. If road building is the only problem from letting the study continue, it is my understanding more old roads will be closed than new ones built. Public access to our forests is already being shut down at an alarming rate. All that is being asked is that the proposed ski area be allowed to continue to be studied since it is already in progress. The public is being told that recreation will replace logging on our national forests. The fact that the USFS is asking for public comment on the 43 million acres roadless plan leads one to believe the plan can still be fine tuned and altered. In this case, the adjustment will amount to 0.000001 percent of the 43 million acres. In light of the history and facts surrounding the Pelican Butte proposal, it is hard to believe that those in the USFS making the decisions have become so morally and ethically bankrupt as to allow the study to be trashed due to a technicality. (Individual, Klamath Falls, OR - #3540.64351)

Members of Congress have specifically called for an exemption for the Pelican Butte project. Senators Gordon Smith of Oregon and Frank Murkoski of Alaska have written to Secretary Glickman requesting an exemption…as has Representative Greg Walden of Oregon….Local civic leaders and elected officials have been outspoken in support of an exemption for Pelican Butte, as reflected in an article from the Klamath Falls Herald and News….Numerous officials in southern and central Oregon also have joined together in a letter to Secretary Glickman, urging that the site-specific review process for Pelican Butte be allowed to proceed to a Record of Decision. (Business, Klamath Falls, OR - #16103.64353)

The idea of having a ski area in the area of Klamath Falls, Oregon has been an expectation of the citizens of this area for a long period of time, over 30 years. The serious work on this effort has been ongoing for over three years, with a final decision on approval now expected at the beginning of next year. The current, and most recent, Pelican Butte proposal originated with a prospectus issued by the Forest Service in 1995, which solicited potential developers for a ski area on Pelican Butte. Pelican Butte Corporation, a wholly owned subsidiary of The JELD-WEN Corporation, responded and was awarded the opportunity to write an Environmental Impact Statement to study the potential for development of a facility on the winter recreation site identified in the Winema National Forest Plan. With the Northwest Forest Plan in place, any proposals for development in the Winema National Forest have had to undergo the rigors and scrutiny of the most thorough environmental studies. For the better part of four years now and at an expenditure of some $3.75 million the PBC has followed all of the process required in an EIS to meet the requirements of the Northwest Forest Plan and have gone through perhaps the most extensive EIS process for a ski facility in the nation’s history. (Individual, Washington, DC - #10020.64353)

It (Pelican Butte Ski) has always been a part of the regional economic development industrial diversification plan of a devastated timber dependent community. It needs resolution. (Tribal, Chiloquin, OR - #10116.93700)

As Chairman of the Klamath Tribes, an organization within Klamath County that has a major concern with establishing and maintaining a diversified and viable economic base within the Klamath Basin, I have been asked to comment upon the impact of the President's Roadless Plan (64 Federal Register 56306, October 19, 1999), particularly as it may impact the Pelican Butte Ski project under consideration in the Winema National Forest….Without being able at this time, due in large part to the unavailability of the final EIS and other economic data, to address whether the Tribes will ultimately support or not support the project based upon its environmental, Tribal cultural and economic impacts, we strongly feel that, given the potential impacts to the entire community, this project should be provided a "grandfather" clause exemption to complete its EIS process and presentation to the Basin community for their consideration. (Tribal, Chiloquin, OR - #10116.64353)

Public Concern: Contrary to the conclusion in the Draft EIS, the Pelican Butte Ski Area would provide more dispersed recreation opportunities than an undeveloped Sky Lakes B roadless area.

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): DISPERSED RECREATION DEIS says "...dispersed recreation would be maintained to meet increasing demands," although dispersed recreation using roads--in greatest demand from national forests--would be effectively prohibited outright. Recreation use of this roadless area has not increased significantly, nor is it projected to do so without the ski area proposal. Winema Forest Plan/Pelican Butte EIS would provide thousands of additional dispersed recreation user days associated with this proposed regional recreation destination (all additional recreation user days forgone by DEIS). (Timber Company or Association, Eugene, OR - #15879.7000)

Public Concern: The Forest Service should consider whether to exempt the Pelican Butte Ski Area proposal from the final rule.

EXEMPT PELICAN BUTTE

The Pelican Butte ski area can be a low impact project with permanent economic and social benefits for the entire region. (Individual, Klamath Falls, OR - #11414.90331)

We would sure like to be able to take our children to the local Pelican Butte ski area in future years. (Individual, Klamath Falls, OR - #11414.92300)

As a local business owner, I look forward to the favorable financial impact of Pelican Butte, but I must also express my support as a resident of the Klamath Basin. The climate is one of the things that first drew me to this area. It's one of the rare areas where we enjoy the four equal seasons to their fullest. I look forward to each season and the recreations that accompany them. Fishing in the spring; water sports on the Klamath Lake in the summer; hiking through the forests in the fall; and in winter, when the snow falls...shoveling!?! But, once I get out of my driveway, I would really enjoy a local winter recreation area where I could go with family and friends. Pelican Ski Park would help strengthen our community economically, assist in keeping our families

from moving away, and provide non-disruptive family entertainment. It may even reduce our juvenile crime rate by providing athletic development and recreational sports. I have always believed that the best way to build a successful community is by building it up from within and Pelican Butte ski/winter recreation area is a step in the right direction. (Individual, Klamath Falls, OR - #10829.64353)

Being Oregon property owners and tax payers we want to express our concern and go on record as being AGAINST the President's designation of Pelican Butte into a roadless area. Even if the Pelican Butte Ski Resort was never to become a reality we feel the public should be able to enjoy the Pelican Butte Area. I am a local CPA in the Klamath Basin and have been in favor of the proposed Pelican Butte ski/winter recreation area for sometime now. In recent years, with the reduction of logging, I have seen the local economy struggle, and have watched many businesses close their doors. It has been a challenge for our community to find new ways to use our local resources to build our lagging economy. Pelican Butte has been cited for many years as a possible winter recreation area. Extensive research and planning has been done to make it a low impact project, but with significant economic and social benefits to our area. I have seen the plans for the ski area and have been very impressed with the efforts to preserve the wild and natural beauty that represents the forests of Southern Oregon. I also believe that the proposed plan actually reduces the existing roads in the Pelican Butte area. (Individual, Klamath Falls, OR - #13673.64353)

DO NOT EXEMPT PELICAN BUTTE

I have been part of the GIS support team for the Pelican Butte project [on the Winema National Forest]. In spite of the fact that this roadless policy would axe the proposed ski development, I am heartened by the roadless designation. It is so much easier to build roads than to reverse the process and return developed lands back into wilderness. Please endorse this policy as soon as possible! (Individual, Corvallis, OR - #4653.90331)

I think we should leave Pelican Butte just the way it is. Beautiful. Then future generations can enjoy it as much as we have. (Individual, Klamath Falls, OR - #11625.92300)

The ski resort is not needed in this area. As of right now this mountain can be used by everyone including skiers. But if it is built it will only be a ski area, and along with a large wildlife population in this area are a lot of residents that oppose this resort. The wildlife, especially elk, will flourish in an area like Pelican Butte that has very limited roads. I am a skier but do not see a need for a ski resort when there are many within 1 to 2 hours from Klamath Falls. (Individual, Klamath Falls, OR - #6547.64353)

Despite a booming economy, the ski industry suffered its second straight decline this year and experts say even the popularity of snowboarding has dropped. The three major regions all showed drops. The Pacific West was down 4.3 percent, the Northeast 0.6 percent, and Colorado suffered a similar drop during the 1998-99 season, and has lost about 1.1 million skier days in two years [quoted in Oregon Newspaper]. Another excellent reason not to cater to developers at Pelican Butte! (Individual, No address - #9436.64353)

Please do not even consider special interest exemptions such as proposed by Jeld-Wen Inc. and possibly the Winema NF staff over the proposed Pelican Butte Ski Area. This proposed ski area is already an environmental disaster waiting to happen, with impacts in roadless areas, impacts to T&E species (area is adjacent to bald eagle winter habitat, is in spotted owl habitat etc.), to air quality and visibility in the adjacent Crater Lake National Park, impacts to the Upper Klamath Lake water quality, which is already an impaired body of water that does not meet standards and is home to endangered species. Some of the land within the proposed Pelican Butte Ski Area has already been set aside as mitigation to offset impacts from other forest activities. Now the Winema NF wants to mitigate the impacts to land that was already a mitigation for impacts to other lands. This has got to stop, especially for a ski area that is not needed. (Individual, Bend, OR - #9905.64353)

I am also totally opposed to an exemption for Pelican Butte for development by Jeld-Wen as a private ski area. It would be a travesty to grant an exemption for this pristine area, which is the largest remaining roadless area in the Winema National Forest, for the benefit of a few skiers and money-grubbing people. Having lived in Klamath Falls for some 28 years now, I have seen the devious attempt by a very small group of people who seek to develop Pelican Butte into a ski development. It would be truly tragic and unprecedented for the Forest

Service to even consider an exemption from the roadless area policy for Pelican Butte. (Individual, Klamath Falls, OR - #14726.64353)

Public Concern: The Forest Service should consider whether to exempt Hogback Basin to allow the expansion of the White Pass Ski Area.

EXEMPT HOGBACK BASIN

I am writing in favor of the plans to expand White Pass into 800 acres of Hogback Basin. I am both a downhill skier and a backcountry skier, and I do not believe that the expansion of White Pass will have a significant impact on environmental qualities of the area. It will provide significant improvement in the safety and quality of the outdoor experience to those members of the public who use the National Forest at White Pass Ski Area for downhill skiing. (Individual, Burbank, WA - #15596.91000)

The purpose of this letter is to voice my support for the draft Roadless Initiative, SPECIFICALLY, the regulatory relief for ski areas with approved Records of Decision. I support complete regulatory relief for all 800 acres of Hogback Basin due to its site-specific removal from Wilderness by the 1984 Washington Wilderness Bill. Please allow the White Pass ski area to expand into the requested 800 acres now under consideration. (Individual, Olympia, WA - #18221.64353)

DO NOT EXEMPT HOGBACK BASIN

White Pass Ski Area (WPSA) in the Washington Cascades is attempting to obtain regulatory relief via the Draft Roadless Initiative, so they can expand into an existing wilderness area. I OBJECT to the expansion of WPSA for the following reasons: The Hogback area, where WPSA wants to expand into, is in an existing wilderness area and [is] already one of the best and most accessible areas for backcountry skiing in the Cascades. Developing this area for alpine skiers will displace backcountry skiers into more dangerous (i.e. avalanche-prone) terrain. I enjoy alpine skiing and back country skiing. THE HOGBACK IS MUCH MORE VALUABLE FOR BACKCOUNTRY SKIING THAN IT IS [FOR] ALPINE SKIING. (Individual, Richland, OR - #18217.64353)

Public Concern: The final rule should not create any special exemptions of any kind for new ski area construction or expansion of current areas.

I support the proposed prohibition on road building, including those in proposed ski area developments. Numerous proposals to expand or build downhill ski areas are threatening roadless areas, including Pelican Butte and Mount Ashland in Oregon, Copper and Beaver Creek in Colorado, and Sherwin and Mammoth/June in California. Ski area developments degrade water quality, disturb sensitive sub-alpine plant communities, sever important wildlife migration corridors, and destroy natural quiet and solitude. In addition, ski areas are increasingly being built or expanded primarily to attract real estate investments, rather than to meet recreational demand. The final policy must not create any special exemptions of any kind for new ski area construction or expansion. (Individual, Davis, CA - #9458.90331)

According to the USFS, 55% of inventoried roadless areas provide water to downstream facilities that treat public drinking water. We note that the development and expansion of new ski areas, an activity that would be permissible under the preferred alternative (p. 3-18), is a major contributor to aquatic ecosystem degradation, particularly from increased sedimentation. THEREFORE, WE REQUEST THAT NO NEW SKI AREAS BE DEVELOPED OR EXPANDED INTO EXISTING ROADLESS AREAS AND THAT THE FEIS BE MODIFIED TO STRENGTHEN ROADLESS AREAS PROTECTIONS ACCORDINGLY. Some examples of potential impacts of ski developments on watershed values include the Mt. Ashland ski expansion, which threatens the McDonald Peak roadless area (a key area for protecting the drinking water supply for the city of Ashland, Oregon), and the Pelican Butte proposed ski development on the Winema National Forest in Oregon, which threatens aquatic ecosystem values tied to the Klamath Lake refuge. Both of these developments

threaten terrestrial and aquatic ecosystems and are inconsistent with Chief Dombeck's emphasis on watershed protection. (Environmental/Preservation Organization, Ashland, OR - #13522.64353)

As a skier, life long, I urge you to not increase area of existing ski areas, & do not start any new ones on USFS land. There is plenty of land available in existing ski areas for the hundreds of skiers. (Individual, Boulder, CO - #13644.90331)

This moratorium needs to include not only areas designated as "roadless" areas but should also include all new road building on public lands, inventoried or not including Special Use Permit Areas such as ski area developments. (Environmental/Preservation Organization, Seattle, WA - #958.64350)

Downhill skiing is also "flat" as an industry, and has been so for the last two decades. SEE National Ski Areas Association website: HTTP://WWW.NSAA.ORG/MEMBERUPDATE/ESTSKIERVISITS.HTM. Ski areas are increasingly being built or expanded primarily to attract real estate investments, rather than to meet recreational demand….Rather than further expanding or developing into roadless areas, the ski industry should focus its resources on retrofitting and modernizing existing ski areas, expanding use with their permitted capacities during mid-week and shoulder seasons, and educating visitors about the wealth and tremendous diversity of other recreational opportunities available to them in mountain environments in both summer and winter seasons. Development currently occurring in Mammoth Lakes and June Lake is a case in point. The real estate sales of Intrawest, a partner in the Mammoth-June Ski Areas, have been booming without any additional ski area development. (Environmental/Preservation Organization, Lee Vining, CA - #15878.91300)

Ski area expansion in Colorado has become a real estate game. We should not sacrifice wildlife habitat and corridors so rich people can have slopeside condos and mansions. The working class people are being run out of the area. There are not enough people to fill existing jobs. The economy may suffer more from overbuilding and loss of pristine forest than from slowing rampant growth. People need places to escape, not move from one city to the next. (Individual, Silverthorne, CO - #13088.90100)

Public Concern: The Forest Service should assure that prohibitions in the final rule cover proposed ski areas that did not have a record of decision signed by October 13, 1999.

We are pleased that the proposed prohibition on road building includes a prohibition on new ski area developments in roadless areas. Numerous proposals to expand or build downhill ski areas are threatening roadless areas, including Pelican Butte and Mount Ashland in Oregon, Copper and Beaver Creek in Colorado, and Sherwin and Mammoth/June in California. Ski area developments degrade water quality, disturb sensitive sub alpine plan communities, sever important wildlife migration corridors, and destroy natural quiet and solitude. It's not just the roads that are bad. Ski areas almost invariably involve the establishment and maintenance of permanent clearcuts, often along draws and riparian areas. All pending ski area EISs without signed ROD prior to October 13, 1999 should be stopped in light of this roadless DEIS. Don't let private for-profit interest override the overwhelming public interest in protection of roadless areas. (Environmental/Preservation Organization, Eugene, OR - #55101.64353)

Public Concern: The Final EIS should explicitly state that helicopter skiing is a suitable dispersed recreational activity in designated roadless areas.

Nowhere in the plan is helicopter skiing listed as one of the anticipated dispersed recreation activities on roadless areas. There are numerous permitted helicopter ski operations on Forest Service lands in the western states and Alaska. Specific mention should be made of this use of roadless lands, since this is the type of dispersed recreational activity anticipated as suitable for these lands. (Business, Girdwood, AK - #52944.91700)

From discussions with the office of the Regional Forester it is our understanding that helicopter skiing is an approved activity within roadless areas. Helicopters are the least physically intrusive methods for providing commercial and recreational activities within forest lands, since roads are unnecessary. It is our belief that roads and new road construction attracts more invasive forms of commercial and recreational activities and therefore we would like to support Forest Service efforts to inventory and protect roadless areas in the Wasatch-Cache and Uinta National Forests. (Business, Snowbird, UT - #17600.91720)

Public Concern: The final rule should not alter snowcat skiing special use permits without due process.

My fears are legitimate that this Roadless Rule, if approved, is the first step in denying access to our winter sports special use permit without due process, or consideration for the thousands of recreationists who use our winter sports services. (Business/Business Association, Diamond Lake, OR - #8499.90331)

6.4 Wildlife-Dependent Activities

Many outdoors enthusiasts express concern for the impacts of the proposed rule on hunting and fishing opportunities on national forests generally and in roadless areas in particular. Many hunters feel that lack of roads will reduce the ease and success of their hunting activities, while a similar number believe the opposite is true. Many fear that the proposed rule will result in restrictions on hunting, and therefore believe the Forest Service should consider the effects of crowding on hunters if access to and acreage of public land is restricted. “Closing more public land will increase hunting accidents and more and more people are crowded into less and less land. Public safety demands that public lands continue to be open to everyone,” one respondent writes.

Many question the adequacy and accuracy of the effects analysis in the Draft EIS, and request a more in depth analysis by the agency. Some request the Forest Service provide a quantified analysis of the effects of the proposed rule on hunting and fishing. One respondent suggests the Forest Service clarify how this proposal will affect access for hunting and dog training purposes on lands acquired in the future. County elected officials ask that the second paragraph on page 3-176 be deleted. They state, “This paragraph is immaterial to the discussion on hunting and fishing. What do cavity nesting birds and mammals, T&E species, and carnivorous species have to do with hunting and fishing?”

Some individuals write that hunting and fishing should be prohibited in roadless areas. Others recommend the Forest Service address “road hunting” and its impacts on wildlife and the environment. One respondent writes, “I don’t believe that there is a need for them [road hunters] to be able to drive up next to a herd, shoot their deer or elk, drive out to the carcass, throw it in a truck, and drive home.”

Several citizens advocate road building and access to aid hunting activities. Others feel the Forest Service should prohibit road building and stewardship logging in roadless areas in order to provide an abundance of wildlife to hunters and sightseers. “My family is a hunting family, and we firmly believe that the increase of roads in our national forests hurts the hunting community by increasing the amount of poaching that occurs, as well as leading to

the game animals leaving the area because of increased traffic," writes one individual. Some specifically request adoption of Alternative 4 on the grounds that it will benefit hunting. Others question this assumption, however, and request that the Forest Service provide documentation as to whether research supports the claim that better quality hunting and fishing is found in roadless areas. One recreational organization requests that walk-in turkey hunting areas be excluded from roadless area consideration. Finally, state wildlife agencies assert that the proposed rule should allow them to perform their responsibilities. Assurances should be made by the Forest Service that "state wildlife agencies' ability to manage fish and wildlife populations will not be restricted by this proposal," states one such agency.

Public Concern: The Forest Service should address the impacts of the proposed rule on hunting.

THE PROPOSED RULE WILL NEGATIVELY AFFECT HUNTING

On a big share of the Targhee NF you can no longer legally, drive off the designated route road to retrieve a big game animal, and the spur roads are tank trapped so effectively that you can not drag a big game animal out with a horse. (Individual, Ashton, ID - #8682.91400)

Proactive management that would be prohibited or severely restricted under the alternatives other than (No Action) can have very positive affects on hunting and fishing depending on the species involved. Elk for example need open areas dispersed with dense cover. They thrive in the seral stages of vegetation that follow fire or logging. Alternatives should focus on the best way to manage these lands and their resources not how to prohibit uses by the American people (Individual, Spokane, WA - #18168.83500)

THE PROPOSED RULE WILL POSITIVELY AFFECT HUNTING

I like to hunt on foot, and roadless areas have the best hunting. Please implement this initiative. (Individual, Great Falls, MT - #6428.91400)

My family is a hunting family, and we firmly believe that the increase of roads in our national forests hurts the hunting community by increasing the amount of poaching that occurs, as well as leading to the game animals leaving the area because of increased traffic. (Individual, Spanish Fork, UT - #799.83500)

Our public lands are riddled with roads and trails that provide human access to the point that wild game is being patterned to migrate to private lands during the hunting season. (Individual, Billings, MT - #940.83500)

Public Concern: The Forest Service should consider the impacts of crowding hunters when access to public land is restricted.

Closing more public land will increase hunting accidents and more and more people are crowded into less and less land. Public Safety demands that public lands continue to be open to everyone. (Individual, Bigfork, MT - #10834.91500)

Also, in our particular area in the state of northern Wisconsin the bear hunters have been forced to come up en masse to hunt there because other areas have been more restrictive. (Individual, Herbstrow, WI - #22357.91400)

Public Concern: The Forest Service should provide a quantitative analysis of the effects of the proposed rule on hunting and fishing use.

To present a meaningful discussion of effects on hunting and fishing, some quantifiable predictions of increases or decreases in hunting and fishing recreation user days must be provided. Current use figures are presented in the Affected Environment section (page 3-173). To simply conclude that the "Action Alternatives" are going to somehow benefit hunting and fishing is far from a true disclosure of effects. States are charged with regulations associated with hunting and fishing and this should have been considered in a Cumulative Effects section, which is missing. The conclusion drawn (Page 3-176, third paragraph) that the "No Action" alternative would result in declines in game populations, decreases in encounter rates for hunters, and then to a reduction in hunting quality is simply mind boggling. Considering the fact that big game populations are at near or record highs over much of the West, a reasonable person would seriously question this conclusion. Where is the data or research to support such a broad sweeping conclusion?
Relief: The Forest Service must address these assumptions in an objective manner. Conclusions and assumptions such as these can result in modifications of hunter use and further economic impacts to communities. Harvest figures from National Forest System Lands for both hunting and fishing are lacking. These figures are published annually by State Fish and Wildlife Departments and would be very easy to compile and extremely helpful to the reader. (County Elected Officials, Worland, WY - #16185.91400)

Public Concern: Clarify how this proposal will affect hunting access to lands acquired in the future.

Please tell me specifically how this would impact hunting in the Cleveland National Forest in California, including hunting birds with dogs, or training for dogs? Specifically what would be the impact of access for areas that are acquired in the future, for access for hunting and dog training. (Individual, No Address - #1541.91400)

Public Concern: The Forest Service should delete the non-game species discussion on page 3-176 from the hunting and fishing section of the Final EIS.

Page 3-176, second paragraph--This paragraph is immaterial to the discussion on hunting and fishing. What do cavity nesting birds and mammals, T&E species, and carnivorous species have to do with hunting and fishing?
Relief: The Forest Service must delete this discussion as it is not germane to the topic. Furthermore, it may lead individuals and groups to an inaccurate conclusion that these are huntable species. (County Elected Officials, Worland, WY - #16185.91400)

Public Concern: Hunting and fishing should be prohibited in roadless areas.

I would like to see stronger controls of these areas: 1. Ban motorized off road vehicles. 2. Eliminate grazing on federal lands. 3. Hunting and fishing should be prohibited. 4. Eliminate all logging practices. The above should apply to ALL federal lands and park areas. (Individual, No Address - #221.64150)

Ban all hunting and fishing in the wilderness areas. There should be some places where the animals can be left completely alone. (Individual, Flagstaff, AZ - #16524.91400)

Public Concern: The Forest Service should address "road hunting" and its impacts on wildlife and the environment.

One aspect of the pros and cons which I feel has received little attention is the flagrant and illegal use of back country roads in our National Forests by "road hunters." These people drive the many small forest roads, often abandoned logging access roads, with loaded guns. In addition to driving the roads, they often use the roads as access for driving off-road through all sorts of terrain-a starting cause of much erosion. I am 80 years old and have often, while hiking, met up with these "sportsmen." They also frequently break down road gates erected by government agencies or private companies to help control erosion or stop harassment of animals. (Individual, Missoula, MT - #8910.91610)

I don't hunt, but I do respect my friends and neighbors who do--I think this activity means a lot to them. However, I don't believe that there is a need for them to be able to drive up next to a herd, shoot their deer or elk, drive out to the carcass, throw it in a truck, and drive home. The person who sold to me the used truck I own now, said he did just that with his truck--driving in on dirt roads, driving over meadows or into the woods to his game, and driving back to the dirt roads. That seems to take the sport out of hunting. (Individual, Laramie, WY - #12973.91400)

Public Concern: The Forest Service should allow road building and access to aid hunting activities.

I am an avid deer hunter, and one of my necessities is a four-wheeler. I believe that roads should be built for four-wheeler use, as long as the hunters tread lightly on the terrain. Most hunters are very responsible drivers and they are very careful not to damage the land with the four-wheelers. Please continue to allow roads to be built on the reserve areas. (Individual, Rochelle, GA - #6994.91712)

I've seen what the closing of roads has done to prohibit the average hunter's chances of success in the Medicine Lake area. Many of these roads were supposed to be for special (creative hunts) hunts, however I see very few hunters on foot using these set asides. (Individual, Redding, CA - #11631.91400)

Public Concern: The Forest Service should prohibit road building and stewardship logging in roadless areas in order to provide an abundance of wildlife to hunters and sightseers.

For hunters to enjoy a good (long) season, there must be an abundance of wildlife. The same is true for people like myself who simply enjoy seeing wildlife during backcountry outings. This abundance can only occur when animals have a secure refuge away from the heavier hunting pressure and activity in the roaded areas. Roadless areas serve as incubators for wildlife. Animals breed and raise young in these roadless areas that later filter out into nearby roaded areas where they can be viewed or hunted. With more private land being closed to hunting, it is important that wildlife herds on public land be kept large and thriving. The way to do this is to protect these core areas of habitat by prohibiting road building and limiting timber harvest to that required for good stewardship. (Individual, Great Falls, MT - #6815.83500)

A recent survey by the Theodore Roosevelt Conservation Alliance found that 86 percent of anglers and 83 percent of hunters supported efforts to keep remaining roadless areas in National Forests free of roads. Fish and Wildlife personnel in the natural resource field have long recognized one of the best ways to maintain a quality hunting and fishing area was to have areas closed to motorized use. Something will be missing from our heritage if we continue the destruction of our last wild areas. As Aldo Leopold said, "There are some who can live without wild things and some who cannot." Save our roadless areas. (Individual, Brainerd, MN - #18882.80000)

SELECT ALTERNATIVE 4

Alternative 4 is also of the greatest benefit to hunting and fishing opportunities by protecting habitat for some game species, particularly those that are sensitive to human disturbance or those requiring large home ranges. (Environmental/Preservation Organization, Seattle, WA - #10788.91400)

Public Concern: The Forest Service should address whether research supports the claim that better quality hunting and fishing is found in roadless areas.

The Forest Service should address the claimed potential benefits for the proposed rule by answering the following questions:
Does research support the claim that better quality hunting and fishing is found in roadless areas? (Individual, Kingsport, TN - #8500.91400)

Public Concern: The final rule should not interfere with current dispersed recreation outputs or the ability to continue controlled burns within walk-in turkey hunting areas.

Three to four thousand acre walk-in turkey hunting areas are intensively managed on Ozark and Ouachita National Forests through utilizing controlled burns. This walk-in program has been successful and should continue. Although portions of some turkey walk-in areas have acreage size and character to qualify as roadless, we recommend the Final Rule not interfere with current dispersed recreation outputs or the ability to continue controlled burns within walk-in turkey areas. (Recreational Organization, Dardandelle, AR - #19474.91400)

Public Concern: The proposed rule should allow for state wildlife agencies to perform their responsibilities.

The proposed rule on roadless areas will have a major impact on the management of wildlife in Arizona by greatly increasing the difficulty of accessing many areas of the state. Such an impact will affect the ability of the Game and Fish Department to perform its responsibilities as well as the ability of sportsmen and other recreationalists to engage in their pursuits. (Federal Elected Official, Washington, DC - #19117.71300)

Coordination with the state wildlife agencies to determine which roads are “essential” for access and management. Identification of wildlife management as a critical activity to be maintained within USFS roadless areas and considered during evaluations to determine whether certain activities or characteristics should be protected within these areas. Assurances that the state wildlife agencies’ ability to manage fish and wildlife populations will not be restricted by this proposal (i.e., nothing in the Rule will diminish the state’s jurisdiction and ability to conduct necessary wildlife management activities within USFS roadless areas). (State Agency, Phoenix, AZ - #18663.83500)

Hunting and fishing, p. 1-173 to 3-177. Page 3-173 states that fishing demand will increase over time while success rates will drop. At the same time stocks drop, implementation of this proposal in any form other than Alternative 1 will limit the ability of forest managers to improve habitat and fisheries people from engaging in viable stream-stocking efforts. (Individual, Whitefish, MT - #30417.90000)

6.5 Non-Timber Forest Products

Many people are concerned with the collection of non-timber forest products, e.g., mushrooms, firewood, seeds, etc. Many feel the Forest Service should address the effects of the proposed rule on access to non-timber forest products and on rural communities dependent on those products. Respondents state, "The Forest Service must evaluate and disclose the effects the 'Proposed Action' will have on rural communities who depend on these miscellaneous forest products for income (sales), domestic use (heating) and business use (fences)." Some, however, feel that harvesting of non-timber forest products should not be allowed in roadless areas. Others feel access should be allowed for firewood cutting and gathering. One individual in particular feels the Forest Service should not limit firewood cutting to within 300 feet of Forest Service roads. Municipalities and private companies request that the Forest Service clarify whether the proposed rule would prohibit traveling into public lands for gathering wild seed. Additionally, say some, the Forest Service should consider natural areas as a source of medicines and of genetic diversity for improved agricultural crops.

Public Concern: The Forest Service should address the effects of the proposed rule on access to non-timber forest products and on rural communities dependent on these products.

It is difficult to discern effects when there is no discussion on the amount of demand for these non-timber forest products. The fact that demand exists is not enough information to conduct an assessment of effects.
Relief: The Forest Service must analyze and disclose the demand for these products, contributions to local economies, and effects of the prohibition alternatives.
COMMENT: General--Traditionally, ranchers and other rural residents have depended on the timber harvest program to access post and pole firewood material for personal and commercial use. They are normally purchased for a small fee that includes a permit. Over time, most of the accessible areas have been utilized. The proposed prohibitions will impact rural residents directly by curtailing the opportunity for future purchase of permits for firewood and post and poles in roadless areas. This proposed rule if implemented would result in increased operating costs accessing non-timber forest products (Page A-21). Roads are essential for the harvest of non-timber forest products.
RELIEF: The Forest Service must evaluate and disclose the effects the "Proposed Action" will have on rural communities who depend on these miscellaneous forest products for income (sales), domestic use (heating) and business use (fences). (County Elected Officials, Cheyenne, WY - #15902.93400)

Public Concern: The Forest Service should not allow the collection of non-timber forest products in roadless areas.

No collection of plants, trees, flowers, mushrooms, berries in roadless areas. (Individual, Whitefish, MT - #8913.93400)

Public Concern: The Forest Service should allow access for fire wood cutting and gathering.

Wood cutters need roads to get their fire wood. (Individual, Cascade, ID - #19617.93200)

We also used those forest roads to get the firewood we needed to keep us warm during a good part of the year. Why deprive the very people who pay for the upkeep of these forests out of the forests. (Individual, No Address - #25194.90000)

DO NOT LIMIT FIREWOOD CUTTING TO WITHIN 300 FEET OF FOREST SERVICE ROADS

I disagree with the proposals locally to limit firewood cutting to within 300 feet of Forest Service roads. Especially after you have closed perfectly good roads, and declared the area as "roadless" because the roads are closed. (Individual, Imbler, OR - #5783.93400)

Public Concern: The Forest Service should clarify if municipalities and private companies would be required to stop traveling into public lands for gathering of wild seed.

In Oregon, city, county, state and federal agencies currently travel into public lands to hand collect wild and native grass seed, wildflower seed and forbe seed from wild stands of vegetation on public lands. Some privately owned seed collecting companies also collect such seeds on public lands.
If our Federal Government wants to do the most it can to protect the ecology of the National Forests--does that mean all the municipalities as well as the private companies must stop traveling into public lands and taking these massive, irreplaceable quantities of wild seed? (Business/Business Association, Portland, OR - #6774.93400)

Public Concern: The Forest Service should protect roadless areas as a source of medicines and of genetic diversity for improved agricultural crops.

Natural areas can also be a source of medicines and of raw material used as the genetic base for improved agricultural crops. (Individual, Dickinson, ND - #16095.90000)

As an R.N., I personally know how important these wilderness areas are, especially the rain forests--as areas known to produce plant life that has been proven to be our only connection to cures for major diseases, including cancer. Don't wipe them out! (Individual, Jackson, MI - #3115.93400)

I think the benefits these forests will provide in terms of future pharmaceutical discoveries and other unknown items because we do not have the technology that will exist tomorrow is not to be underestimated. I think we need to preserve these forests for the richness unknown to us now, but that can be realized later is critical. If we destroy this habitat for a quick gain, any potential long term benefits will be lost forever. (Individual, Bear Creek, PA - #12121.93400)

6.6 Cultural and Heritage Resources

Many respondents feel the Forest Service should address access to cultural and historical sites. Several state agencies argue that access should be maintained to avoid adverse effects to these sites. "We are concerned that the proposal to prohibit road construction will increase the potential for the neglect of a property which causes its deterioration," writes one agency. Therefore, "We . . . recommend that for those historic properties that are identified, existing access be maintained to avoid adversely affecting the historic properties." Other individuals and tribal representatives, however, argue that access should be limited to prevent discovery and/or damage to these sites. Indeed, many people feel the proposed rule should protect roadless areas given that the proximity of a road is the best predictor as to whether an

archeological site will be vandalized. Others state that keeping the existing road definition will aid in cultural site protection. One individual feels European cultural artifacts should be valued as much as Native American cultural artifacts and protected by the same laws.

As required by CEQ (Council on Environmental Quality) Regulations, note some respondents, the Forest Service should conduct a heritage resources cumulative effects analysis for all alternatives. Some feel the Forest Service should disclose the effects of the final rule on federal agencies' ability to fulfill their legal requirement to inventory all lands for cultural properties. The Forest Service should comply with the National Historic Preservation Act by identifying cultural/historical properties and analyzing what impacts the proposed rule may have on them, maintains a state agency from Wyoming. Sufficient funding should be provided to accomplish these goals, this agency asserts.

In addition, the Final EIS should provide a detailed analysis of the paleontological resources that are present in areas proposed for closure, submits a state agency. Other government officials request road access for the excavation and preservation of paleontological resources. A state elected official from Utah comments, "The DRAFT EIS, in a number of the geological discussions, claims that a lack of additional roads prevents destruction through vandalism. This is true, but it also stifles efforts to locate, understand, remove, and preserve fossils which may otherwise decay and be lost forever if simply left to rot on the forest floor or in the near surface." A county elected official likewise remarks, "When many fossils are quarried and cut from rock, the resulting blocks can weigh over 1,000 pounds, as is the case with the proposed Hadrosaur excavation in the Grand Staircase-Escalante National Monument. The unavailability of vehicles to transport these masses of rock equates to an inability to excavate the remains, leaving behind a valuable piece of history and important specimen for studies."

Public Concern: The Forest Service should address access to cultural and historical sites.

MAINTAIN ACCESS TO AVOID ADVERSE EFFECTS

Pursuant to the National Historic Preservation Act (16 U.S.C. [Section] 470 et seq. and 36 C.F.R. Part 800) the Indiana Department of Natural Resources, Division of Historic Preservation and Archaeology ("DHPA") has considered the draft EIS and proposed rule for the Hoosier National Forest in Indiana, for the USDAFS.
Based upon the documentation available at DHPA, there are historic buildings, structures, districts, objects, or archaeological resources which may be eligible for inclusion in the National Register within the probable area of potential effects. There are several properties identified in the PERRY COUNTY INTERIM REPORT, INDIANA HISTORIC SITES AND STRUCTURES INVENTORY which are within or in close proximity to the area denoted as an "Inventoried Roadless Area identified in forest plans or other completed assessments adopted by the agency allocated to a prescription that allows road construction or reconstruction" as stated in the Draft E.I.S. We recognize that the Draft E.I.S. mentions that existing legislation requires Federal agencies to carry out certain responsibilities in order to preserve historic properties. However, we are concerned that the proposed rule may hamper the USDAFS's ability to protect historic buildings and structures.
In particular, we are concerned that the proposal to prohibit road construction will increase the potential for the neglect of a property which causes its deterioration. We recommend that the USDAFS make an effort to identify and evaluate buildings and structures currently in the Indiana IRA, so that it can take into account the effects, if any, on those historic properties. We also recommend that for those historic properties that are identified, existing access be maintained to avoid adversely affecting the historic properties. Enclosed is a copy

of the PERRY COUNTY INTERIM REPORT for your reference. We believe that the existing Indiana IRA may be within LEOPOLD AND UNION TOWNSHIPS, although the precise boundaries are unclear based upon the maps provided in the Draft E.I.S. (State Agency, Indianapolis, IN - #13528.90230)

The preferred prohibition alternative, Alternative 2, would generally serve to protect cultural resources. However, as pointed out in the DEIS, implementation of this alternative may result in a loss of access to historic properties. This loss of access could result in deterioration of these properties. In accordance with the National Historic Preservation Act (NHPA) regulations, 36 CFR Part 800.5(a) (2) (vi), the inability to access these properties for proper maintenance could result in an adverse effect to significant cultural resources. As also stated in the DEIS, public interpretation of these resources could be hindered. Access to these resources, particularly for the disabled public, could become problematic. (State Agency, Cheyenne, WY - #15887.90230)

LIMIT ACCESS TO PREVENT DISCOVERY AND/OR DAMAGE

What do tribes see as the potential benefits of preventing any new road construction in roadless areas? THEY SEE LIMITED ACCESS AS A BENEFIT IN PREVENTING DISCOVERY AND/OR DAMAGE TO CULTURAL SITES. (Tribal, Brigham City, UT - #5659.90230)

I've been involved in studying New Mexico history for over 20 years. And the more that you study New Mexico history, you realize that our roadless areas are repositories for much of our state's history. Victorio's Camp in the Black Range, homesteader cabins around El Malpais, Gallinas culture sites up in the Santa Fe National Forest; I could just go on and on and on. Roads threaten sites such as these.
I recently was up in the Rio Puerco area in a very heavily roaded area, and as I was walking down one dirt road, I saw, on the road, fragments of pottery that had been broken by a vehicle whose driver I'm sure wasn't aware at all that they were even there.
But when you study New Mexico history and you learn to value it, you realize that roadless areas themselves are historic artifacts. These were the areas that shaped our history, they were the setting for our history, and they can still be the setting for our history in positive ways.
But when roads are built into these areas, not only are individual sites often destroyed, but the historical quality of the area itself is impaired. They're fragile, they're irreparably broken, and they become just like those pottery shards along the Rio Puerco. (Individual, No Address - #14500.90230)

Public Concern: Given that the proximity of a road is the best predictor of whether an archeological site will be vandalized, the final rule should protect roadless areas.

As a professional archaeologist and concerned citizen I am writing to comment on the roadless areas NOI. The presence of a road in proximity to an archaeological site or other non-renewable cultural/heritage resource is the best predictor that a site or cultural resource will have been vandalized or illegally collected, depriving future generations of their public heritage. Our cultural resources are rapidly disappearing and increasingly are being damaged through such collection and illegal digging. The public should have access to some areas in a controlled, planned, and regulated fashion, but other areas should be retained in a roadless state to preserve the integrity of our cultural heritage on public lands. (University/Professional Society, Logan, UT - #979.90230)

BY KEEPING EXISTING ROAD DEFINITION

An additional impact of legitimizing old trails as roads will be the increased ease of motorized access to archeological sites. The Abajos are probably richer in archeological remains than any other district in the Forest Service and deserve better protection. Already people are in prison for illegally raiding sites on Forest Land in the Abajos. The DEIS, if finalized, will make the situation worse. What we are asking is this: keep the old definition of roads and trails. It is easier to understand and is site specific, being based on actual conditions, not a management model. The new definition is confusing and cerebral, with very real negative consequences in the rural west. (Environmental/Preservation Organization, Moab, UT - #57166.90320)

Public Concern: European cultural artifacts should be valued as much as Native American cultural artifacts.

Many of these roads are historic trails created during the Comstock Era and represent our cultural heritage. Ironically, if these trails were a Native American cultural artifact rather than a European cultural artifact, they would be protected by federal law. (Individual, No Address - #2236.90230)

Public Concern: As required by Council on Environmental Quality Regulations, the Forest Service should conduct a heritage resources cumulative effects analysis for all alternatives.

Heritage Resources
Comment: Entire Section--There is no cumulative effects analysis for this section.
Relief: The Forest Service must conduct a cumulative effects analysis for all alternatives as required by CEQ Regulations. (County Elected Officials, Worland, WY - #16185.90230)

Public Concern: The Forest Service should disclose the effects of the final rule on federal agencies' ability to fulfill their requirement to inventory all lands for cultural properties.

Heritage Resources
Comment: Entire Section--It has been well documented that a majority of culturally significant sites on National Forest lands have been discovered due to activities associated with road construction, reconstruction, and timber harvest. In response to Executive Order 11593, charging federal agencies to inventory all lands for cultural properties, the effects of the prohibition alternatives must be disclosed.
Relief: The Forest Service must disclose the effects of the prohibition alternatives on Executive Order 11593. (County Elected Officials, Worland, WY - # 16185.90230)

Public Concern: The Forest Service should comply with the National Historic Preservation Act by identifying cultural/historical properties and analyzing what impacts the proposed rule may have on them.

The DEIS further states that under the no action alternative, Alternative A, that additional sites may be located and evaluated as part of project related activities. We agree. However, we wish to remind the USFS that it has further responsibilities to locate and evaluate cultural resources under Section 110 of the National Historic Preservation Act. (State Agency, Cheyenne, WY - #15886.93600)

To be in compliance with Section 106 of the NHPA, the USFS must, prior to implementation of any undertaking under the roadless initiative, identify historic properties which may be potentially affected, assess effects and seek ways to avoid, minimize or mitigate any adverse effects on historic properties. (State Agency, Cheyenne, WY - #15887.90230)

BY PROVIDING SUFFICIENT FUNDING TO FIELD ARCHAEOLOGISTS

We encourage the USFS to provide sufficient funding to its field archaeologists to comply with Section 100 of the NHPA so that the location, recordation, evaluation, preservation, and interpretation of these resources is not dependant upon project driven funding. (State Agency, Cheyenne, WY - #15886.93600)

Public Concern: The Final EIS should provide a detailed analysis of the paleontological resources that are present in areas proposed for closure.

[Provide] a detailed analysis of the paleontological resources that are present in the areas proposed for closure. (State Agency, Laramie, WY - #15888.93530)

Public Concern: The Forest Service should allow road access for the excavation and preservation of paleontological resources.

The proposed rule may have a detrimental affect on the preservation of vertebrate fossils. The DEIS, in a number of the geological discussions, claims that a lack of additional roads prevents destruction through vandalism. This is true, but is also stifles efforts to locate, understand, remove, and preserve fossils which may otherwise decay and be lost forever if simply left to rot on the forest floor or in the near surface. (State Elected Official, Salt Lake City, UT - #43918.93530)

Limiting access to these public lands will make the discovery and excavation of new paleontological resources nearly impossible. When many fossils are quarried and cut from rock, the resulting blocks can weigh over 1,000 pounds, as is the case with the proposed Hadrosaur excavation in the Grand Staircase-Escalante National Monument. The unavailability of vehicles to transport these masses of rock equates to an inability to excavate the remains, leaving behind a valuable piece of history and important specimen for studies. As is the case with most of the activities that take place on Forest Service lands, the use of helicopters would not be practical. (County Elected Official, Panguitch, UT - #44073.93530)

6.7 Recreation and Travel Management

None of the action alternatives presented in the Draft EIS for the proposed rule directly restrict recreational activities in roadless areas. However, a great number of responses submitted to the Forest Service on the proposed rule address recreational use issues, especially motorized access. Many people do not separate their ability to access national forests for recreational activities from road and trail infrastructure management, so related concerns may be found in Section 6.2. Recreational issues and concerns are divided into the following sections: 6.7.1 General Management; 6.7.2 Access to Existing Roads and Trails; 6.7.3 Motorized Recreation; 6.7.4 Non-motorized Activities; 6.7.5 Recreation Capacity, User Conflicts, and Adequacy of Effects Analysis; and 6.7.6 Public Education, Monitoring, and Enforcement.

6.7.1 General Management

Many people are concerned the proposed rule will restrict access for recreational activities and OHV driving. One individual states, “I am concerned that the Clinton/Gore roadless directive could close an additional 60 million acres of our forest lands to campers, hunters, fishermen, off-highway vehicle enthusiasts, snowmobilers, rockhounders, mountain bikers, sightseers, and four-wheel-drive operators.” Many citizens are vehemently opposed to the proposed rule because they fear it will restrict access for the elderly, very young, and/or handicapped. “I am very involved with veterans who have been medically retired from service, are elderly, handicapped, or have young children. New environmental restrictions

would make these people unable to enjoy remote places without road access," states one individual.

Others feel, on the contrary, that restricting a particular mode of travel is not the same as restricting personal access. One individual requests that the Forest Service clearly state that access on National Forest System lands means the legal right for a person to simply be present on public land and has nothing to do with permitted activities or mode of transportation. In addition, many feel that claims of discrimination and elitism are unfounded. Some point out the plethora of existing roads and trails that will be completely unaffected by the proposed rule, noting that opportunities for motorized access abound on federal lands. Many citizens believe the Forest Service should refute the contention that non-motorized activities in roadless areas are limited to the wealthy, elite, able-bodied and physically fit. One individual explains, "When my condition prevented this [backpacking], it never occurred to me that the public owed me a motorized way to get back there. Instead, I relished the mountains I could get to by automobile on existing roads. And I enjoyed knowing there were protected wildlands, even if I couldn't get to them. Now I can day hike again, and find that easy walks reduce my back pain. I can only make it a few miles in, but every time I find the damage done to the soils by off-road vehicles I fear that they're destroying this disabled person's opportunities to recreate." One environmental organization adds that recreational activities, "contrary to what has been said, . . . are not activities that only the rich, elite, or extremely physically fit can do--they are possible for anyone with the inclination to do them." "I have two pins in my knees--if I can walk in, so can the rest!" remarks one individual.

Some members of the public feel they should be allowed to travel on roads that provide access to existing camping and/or recreational areas. One individual recommends the Forest Service should consider a rotation system for open and closed roads. They request the Forest Service "rotate public use of these roads to give opportunities to do maintenance, improvements, and logging." Another citizen suggests limiting the use of motorized vehicles and necessary access to either authorized agency personnel or handicapped persons on designated routes. To alleviate concerns about access for the disabled, some suggest that the Forest Service should develop special permits for these individuals. "Have the handicapped people that want to get out into the woods apply for a federal or state permit for truly handicapped people. It wouldn't be any more hard to police than a hunting permit or driver's license," submits one individual. Others suggest that motorized access to roadless areas only be allowed for senior citizens. One individual suggests that in some roadless areas the Forest Service provide senior citizen paths, wheel chair access, and short loops for sightseeing. Another individual calls for the Forest Service to make special efforts to provide wilderness opportunities for the physically challenged. Others assert that the final rule should allow development of new campgrounds in roadless areas, with one individual specifically requesting primitive backcountry campsite construction. Similarly, some individuals request improved trailheads and parking areas "for those willing to go into the woods by foot." In contrast, some members of the public support alternative forms of transportation.

In order to protect roadless wildland values, one environmental group recommends the Forest Service prohibit low over-flights of aircraft except in cases of emergency. The state of

Idaho, however, requests that the final rule explicitly guarantee aviation access to existing public use airports within inventoried roadless areas. This right has been specifically guaranteed for airstrips in several Idaho wilderness areas, they note, and feel that it should be extended to those in roadless areas.

Public Concern: The Forest Service should consider that the proposed rule will restrict access for recreation.

Without access to the motorized trails in these areas, and the ability to reconstruct and maintain them when necessary, OHV enthusiasts will lose a valuable opportunity for responsible recreation on public land. (Individual, Clinton, UT - #104.10212)

Please don't lock us out of our public land--help us protect access for all recreationists, including motorized vehicle enthusiasts. (Individual, Clinton, UT - #104.10212)

I am concerned that the Clinton/Gore roadless directive could close an additional 60 million acres of our forest lands to campers, hunters, fishermen, off-highway vehicle enthusiasts, snowmobilers, rockhounders, mountain bikers, sightseers, and four-wheel-drive operators. (Individual, Westminster, CO - #115.10212)

If these lands are closed, my family will lose the opportunity to continue what we do to spend time having fun with each other. This is everyone's land, it belongs to all of us, no one group should be shut out, it is not fair. (Individual, Manchester, MI - #1223.10212)

We oppose the alternatives selected in the DEIS because it decreases public access to the forest for recreational activities--biking, berry picking, snowmobiling, motor recreational activities into limited areas. (Local Community/Civic Organization, Spokane, WA - #6118.10210)

Public Concern: The Forest Service should consider that the proposed rule will restrict access for the elderly, very young, and/or handicapped.

I have an injury that prevents me from walking long distances, I have no land to keep a horse, so ATV's are my only option to see the land. (Individual, London, KY - #152.10213)

One maintained road providing access through an area with parking locations scattered along it, would distribute the hikers throughout the area and provide access for handicapped people to at least be able to visually enjoy the area. I would hope that you would seriously reevaluate your access policy to all wilderness areas and at a minimum exclude all taxpayers equally. (Individual, No Address - #160.10213)

I am strongly opposed to your proposal to close roads in national forests. As a paraplegic, my only access to wilderness areas is by 4wd truck. Your proposal discriminates against disabled and elderly people. (Individual, Gloucester, VA - #345.10213)

Why are you people hell bent on bringing this country to the stone ages? We have more and more older people that want to see our forests by ROADS. We also need more campgrounds and recreation areas. (Individual, No Address - #409.10213)

This proposed plan is discriminatory inasmuch as it eliminates persons with disabilities from enjoying the outdoor experience and caters only to a select few, opening the door for possible class-action lawsuits. (Individual, Big Sur, CA - #1045.10213)

Too much forest land is not available to folks too young or old to hike, but would still like to see the backcountry. If we can't use it, why have it!!!! (Individual, AZ - #1253.10213)

I would agree that protection is needed to maintain our lands, but I don't agree with environmental groups' efforts to place these areas off limits to everyone but the most conditioned athletes who can hike miles into the wilderness. I am very involved with veterans who have been medically retired from service, are elderly, handicapped, or have young children. New environmental restrictions would make these people unable to enjoy remote places without road access. (Individual, Eugene, OR - #3257.10213)

Public Concern: The Forest Service should clearly state that access to National Forest System lands means the legal right for a person to simply be present on public land and has nothing to do with permitted activities or mode of transportation.

In addition, the ORV users raised the straw man of access for handicapped people. Universal access for all works well in civilized, developed parts of the nation, where provisions for physical access cost relatively little and make sense. However, in the large areas of Forest Service land, especially those managed for natural values, insisting upon universal physical access leads quickly to absurdity. We would have to build roads on both sides of every stream, along every ridgeline, and to the top of every summit. Not only that, but the roads must necessarily all be useable by any street licensed vehicle. Very few handicapped and elderly drive 4WD vehicles. In addition, we must upgrade all existing 4WD roads for use by street licensed vehicles. All those roads would totally eradicate the natural values for which the land was being managed. Add to that the cost of such an endeavor and the absurdity becomes overwhelming. Obviously the initial premise--universal physical access to all public lands--is not valid.
Access on Forest Service lands means the legal right for a person to go to and be present on a piece of public land. It has nothing to do with what activities the person may engage in while on that piece of land or the mode of transportation used by the person to get there. These are entirely separate issues that have nothing to do with access. (Individual, Lakewood, CO - #12965.91610)

Public Concern: There are more than enough roads to meet the needs of the elderly and handicapped and allow them to experience public wildlands.

As for the elderly and the handicapped, it is important that we provide roads on Forest Service lands that allow them to experience as best they can the beauty and joy of these lands. This does not necessitate construction of roads to every nook and cranny. With more than 386,000 miles of roads in the Forest road system, plus all the miles of county, state, and federal highways that cross Forest Service lands, there are more than enough roads already existent to meet the needs of the elderly and handicapped. (Individual, Lakewood, CO - #12965.91700)

Public Concern: The Forest Service should refute the contention that non-motorized activities in roadless areas are limited to the wealthy, elite, and physically fit.

Another issue…is access to the backcountry for the disabled. I am disabled with severe back problems. I used to backpack to find the quiet and beauty I love in the mountains. When my condition prevented this, it never occurred to me that the public owed me a motorized way to get back there. Instead, I relished the mountains I could get to by automobile on existing roads. And I enjoyed knowing there were protected wildlands, even if I couldn't get to them. Now I can day hike again, and find that easy walks reduce my back pain. I can only make it a few miles in, but every time I find the damage done to the soils by off-road vehicles I fear that they're destroying this disabled person's opportunities to recreate. (Individual, Butte, MT - #53008.91610)

Even with protection, these forests will still be open to a staggering number of activities, including but not limited to: hiking, camping, backpacking, horseback riding, fishing, hunting, canoeing, rafting, kayaking, rock climbing, mountain climbing, mountain biking, cross-country skiing, snowshoeing, birdwatching, running, walking, swimming in lakes, looking at stars, breathing deep fresh air, taking pictures, meeting Nature on its own terms, listening to the birds sing, enjoying the silence, looking at the mountains, vistas, flowers, trees, and marveling at life in the forest. Contrary to what has been said, these are not activities that only the rich, elite, or extremely physically fit can do--they are possible for anyone with the inclination to do them. (Environmental/Preservation Organization, No Address - #1826.91700)

I would…like to see any form of mechanized travel banned in, on or above areas designated as wilderness (cars, dirt bikes, helicopters, etc.). I have hiked and climbed for over 30 years and [this is] the major problem and danger to any wilderness boundaries and national park boundaries. I have two pins in my knees--if I can walk in, so can the rest! (Individual, Shelton, WA - #388.64150)

And who will use these areas? We all will!!! Roadless areas will help maintain a livable environment for all. Many of us will enter on horseback, both private and with packer, while others will choose canoe or kayak. A great many others will choose to use these areas on foot, as I have since the 1940's. (Individual, Cambria, CA - #11348.91000)

Public Concern: The public should be allowed to travel on roads that provide access to existing camping and/or recreational areas.

As a person who has enjoyed driving and hiking in National Forests for many years I have a firm belief that this privilege should be continued on roads that meet the following criteria:
The road provides access to existing camping and/or recreational areas. (Individual, Sun Lakes, AZ - #10732.91000)

These forests are ours to use and the more roads, campgrounds and areas we can get to the more we can enjoy it. (Individual, La Grande, OR - #11292.91700)

Public Concern: The Forest Service should consider a rotation system for open and closed roads.

I recommend you open more maintained roads to the public, since it was Federal Funds that built them, and do regular maintenance and improvements on all other F.S. roads. You could rotate public use of these roads to give opportunities to do maintenance, improvements, and logging. (Individual, Noxon, MT - #3405.71300)

Public Concern: The Forest Service should limit the use of motorized vehicles to necessary access by either authorized agency personnel or handicapped persons on designated routes.

Please limit the use of motorized vehicles to necessary access by (1) authorized agency personnel and their appointed sub-contractors, performing necessary maintenance and emergency intervention, and (2) handicapped persons on designated trails. (Individual, Cupertino, CA - #286.61300)

All existing roads in the Forest Service system should be gated wherever possible with the ability to circumnavigate these gates by handicapped and senior citizens only. (Cornelia, GA - #9392.84610)

Public Concern: The Forest Service should develop special permits for disabled individuals.

I have a suggestion that might work or at least for you to consider, have the handicapped people that want to get out into the woods apply for a federal or state permit to truly handicapped people. It wouldn't be any more hard to police than a hunting permit or driver's license. (Individual, St. Louis, MO - #13237.10213)

Public Concern: The Forest Service should allow motorized access to only those over 65 years of age.

As you must be aware, the average age of the population is increasing, and so is the need for roads where senior citizens can see and appreciate this natural tax supported environment.
Limit the roads, but do not eliminate them. Allow only those over 65 use of the roads, and make those able to walk do so. These are the ones that want this issue passed anyhow. (Individual, Ryderwood, WA - #6398.10213)

Public Concern: In some roadless areas the Forest Service should provide senior citizen paths, wheelchair access, and short loops for sightseeing.

The idea that a roadless area is closed to the public is simply not true. The Forest Service will have to make an effort to counter the idea that these areas are closed, when in fact we should be encouraging their use and appreciation. Some areas should be promoted and expanded to provide senior citizen paths, wheel chair access, and short loops where the less able are still given an opportunity to visit the wild diversity of natural areas across the country. (Individual, Boise, ID - #1661.61300)

Public Concern: The Forest Service should make special efforts to provide wilderness opportunities for the physically challenged.

Special efforts should be made to also provide wilderness opportunities for the physically challenged. (Individual, Central Point, OR - #13102.93642)

Public Concern: The final rule should allow development of new campgrounds in roadless areas.

Also…campgrounds in the edge of the roadless area should BE permitted. Campgrounds should be permitted to be constructed in the interior of the area without roads being built to them. (Individual, Carson, WA - #13433.91700)

DEVELOP REMOTE INTERIOR CAMPING SITES

Remote interior camping sites-similar to those proposed in Denali State Park South side-should be considered and would require some timber removal. (Individual, Anchorage, AK - #17438.91740)

Public Concern: The Forest Service should consider installing additional trailhead or parking areas.

…the Chugach N.F. is closest to Alaska's major population center of Anchorage. Some minimal trailhead or just plain parking areas should be available for those willing to go into the woods by foot. The foot trail into Ptarmigan Lake is a good example but a real trail out to the Paradise Lake cabins is a better alternative than any type of "road" to either place. (Individual, Anchorage, AK - #17438.91740)

Public Concern: The Forest Service should consider introducing public transportation.

I would like to see highly regulated and limited use of vehicle traffic in existing forests and introduction of other forms of transportation such as trains that reduce pollution and accommodate large numbers of visitors at once, trams and busses… (Individual, Boise, ID - #15967.91610)

Public Concern: The Forest Service should prohibit low over-flights of aircraft except in case of emergency.

…If roadless area characteristics associated with Wildlands Values (DEIS 3-161), many of which are recognized and valued by the American Public, are to be preserved, the following management guidelines must be adopted:
…Low over-flights of all aircraft prohibited except in case of emergency. (Environmental/Preservation Organization, Albuquerque, NM - #43737.90240)

Public Concern: The final rule should explicitly guarantee aviation access to existing public use airports within designated roadless areas.

Our primary concern is the preservation of public use airports and associated aviation activity within the inventoried roadless areas in the State of Idaho. The DEIS and meeting presentations did not specifically address airports or aviation activities within roadless areas….We have attempted to determine the impact of the two preferred alternatives on the existing public use airports located on Forest Service lands in Idaho. The Forest Service airports located in the Selway Bitterroot Wilderness area are allowed to remain open under the provisions of the 1964 wilderness legislation. Airports in the Frank Church River of No Return Wilderness are specifically protected under the provisions of this particular wilderness legislation. Airports located outside of wilderness areas are located adjacent to existing maintained roads and should not be impacted by the proposed preferred alternatives. The Graham USFS Airport is in an area that has been recommended for wilderness classification by previous Forest Service planning documents that would require Congressional action for wilderness designation. In Addition, the DEIS states that "existing access to inventoried roadless areas for recreation opportunities would not change because of this proposal." (State Agency, Boise, ID - #18629.71100)

6.7.2 Access to Existing Roads and Trails

Many citizens feel they have a right to access existing roads or trails and that the Forest Service should not deny the public access. An individual from Alaska claims Forest Service roads are necessary for routine activities and medical emergencies until a better highway system can be developed in Alaska. Another citizen states, "Some of the old roads that my father and grandfather used and helped build over a hundred years ago have been closed. I

see no harm in keeping them open." Many motorized recreational users request that the Forest Service retain roads for logging in an unmaintained state and open to off-road vehicle use. The Forest Service should not improve all of the remaining roads because many off-road enthusiasts prefer technically challenging roads, they point out. Respondents also request that all unmaintained roads be left open, and argue that these roads not become classified or upgraded for travel in stock vehicles. In addition, many people feel if a road is of historical or scenic significance, the Forest Service should not take away recreational access.

Often members of the public request information about impacts of the proposed rule on the status of specific roads or trails they are closely associated with. Some fans of competitive events on public lands assert that the final rule should include provisions to keep trail and road access open for trail dependent competitions, such as bicycling, equestrian events, and Enduro motorcycle challenges.

Some feel the Forest Service should reverse its road closure and restriction policy by opening gated roads. Roads that have been blocked off by the Forest Service should be reopened in case of fire, states one individual. Others feel special preference should not be given to people with leases or special use permits because everyone should have equal access. Additionally, one individual writes, if a road has already been improved to the status of an "all weather" road, access should be granted to the public. Finally, many non-motorized users request that some of the trails in roadless areas be restricted from motorized use.

Public Concern: The Forest Service should keep existing roads and trails open to public access.

I have lived in areas of Alaska that relied upon USFS roads to get to a medical clinic in the case of a serious medical emergency. I have known people who would have died if it wasn't for those roads. They are far more economical to build than the highways that we have in the lower forty-eight, but they do serve a bigger purpose than just accessing timber. There simply is not the money to build proper highways in Alaska to provide a good highway system like everyone else has in this country, but USFS roads can be an economical alternative. I am sure that logging roads were an important part of fulfilling the transportation requirements of the West as it became more and more populated. USFS roads are equally important to many of us in southeast Alaska until something better is here. We deserve the same opportunity to develop that most of our other States had. (Individual, Ketchikan, AK - #199.71300)

Some of the old roads that my father and grandfather used and helped build over a hundred years ago have been closed. I see no harm in keeping them open. My jeep is my only way of seeing these places that we all love, also wish a little maintenance would be done to keep them passable. Please don't close any more. (Individual, Manti, UT - #818.71300)

As an active off-road motorcyclist, I oppose the proposed closing of trails and roads in our national forests. The forests are for all taxpayers to enjoy and use. I wish to continue that right. (Individual, Carlsbad, CA - #947.71300)

While I can support the concept of roadless area conservation, I do not support closure of existing roads except when two roads start and stop in the same general area, one could be closed, the other left open. After reading the Roadless Area conservation booklet thoroughly it appears that there is enough room in the definitions for local managers to close existing roads. The way I read this an unroaded area is an area without a classified road. So therefore most of the roads I travel on are unclassified. According to procedural alternative "B" local

managers after evaluation could close an unclassified road in order to protect the area's roadless area characteristics. I don't support the closing of any existing road. (Individual, Las Vegas, NV - #1261.71300)

There are many of these roads that have been in use for 20 to 50 years or more, but because they are not "classified" as roads, they are being closed. This is WRONG, and it will backfire on you in the long run. (Individual, Springdale, AR - #2273.71300)

I like having access to 4X4 roads. I agree that we have enough of them in Nevada and don't need to build any more. I still think they should be open to motor vehicles. (Individual, Carson City, NV - #787.91710)

Page 3-171 and Page 172--The effects analysis must recognize that the inventoried and uninventoried roadless areas currently provide some level of motorized recreation on "unclassified roads." This use must be evaluated in order to adequately disclose effects. Any decision to restrict use on these roads must be based on a complete and thorough inventory of all existing roads and use levels. Without this determination it is impossible to accurately evaluate the impacts of the alternatives.
RELIEF: The Forest Service must conduct an inventory of these uses on a local basis and disclose the effects the "Proposed Action" will have on local motorized recreation and communities. (County Elected Officials, Basin, WY - #43980.90010)

By placing restrictions on the public and not allowing them to use the ground we all pay taxes on then you create tension within the public and this creates vandalism and many radical groups who are bent on causing trouble. (Individual, No Address - #7082.41500)

Unclassified roads that require no maintenance currently exist on many National Forests. They have provided cost effective access to forest users over the past 100 years, some being the only vehicle access to high quality hunting, fishing and other dispersed recreational opportunities. These unclassified roads should continue to be made available to recreational users. (Recreational Organization, Dardanelle, AR - #19474.91710)

Public Concern: The Forest Service should retain roads for logging in an unmaintained state and open to off-road vehicle use.

ALL roads built by the Forest Service and paid for by public funds for tractor trailer log trucks should remain ungraded and open to OHV. Maintained or not. (Individual, Golden Valley, MN - #8261.10210)

The proposed rule notes that remaining roads will be improved. Some roads should NOT be improved. The joy of recreating in the National Forest is the availability of technical, difficult to traverse dirt roads/trails. The National Forest does not need to offer paved experiences like National Parks. (Recreational Organization, No Address - #9089.71300)

Public Concern: The Forest Service should not close unmaintained roads. Unmaintained roads should not become classified or upgraded for travel in stock vehicles.

The plan seems to focus too much on "classified roads" while ignoring the existence of unclassified roads. Here in Southern Arizona, there are many unmaintained (a better description than unclassified, even though they aren't classified) roads within and outside the national forests. These unmaintained roads provide an extremely valuable resource for off-highway recreation such as 4-wheel-drive travel, motorcycle and mountain bike travel. For the most part, these roads were created 50-120 years ago when there was considerable dispersed mining in the area. As a four-wheel-drive enthusiast, these unmaintained roads and trails have provided me with a fantastic opportunity to enjoy the scenery, flora and fauna of southern Arizona. My worries are that by not being classified, these roads will be closed entirely, or if they were classified they might then be

maintained for travel in stock vehicles and thereby ruin the challenge of 4WD recreation. (Individual, Tucson, AZ - #13317.91710)

Public Concern: If a road is of historical or scenic significance, the Forest Service should not take away recreational access.

As a person who has enjoyed driving and hiking in National Forests for many years I have a firm belief that this privilege should be continued on roads that meet the following criteria:
The road is of historical or scenic significance. (Individual, Sun Lakes, AZ - #10732.90200)

Public Concern: The Forest Service should address the impacts of the proposed rule on the status of specific roads or trails.

I am concerned about how the Roadless proposal will impact Los Padres National Forest.
And because it is not a state highway, what will happen to Lockwood Valley road?
Because of the geography of Los Padres, particularly the eastern and northern accesses to the Dick Mith and San Raphael wilderness areas, deterioration of existing access roads will severely inhibit wilderness access. In particular, what will happen to the Tinta Canyon, Santa Barbara Canyon, and Sierra Madre access roads? It is a long, exposed, dusty hike from Highway 33 to the Tinta Trailhead--and even worse for Santa Barbara/Mulduce Trailheads! (Individual, No Address - #7662.91000)

I would hate to see existing USFS trails (such as the Lost Lake Trail from the McKinnney Rubicon) be forever closed and not maintained. Since this was a preexisting OHV trail designed specifically for the USFS and recreational use, it should still be maintained under the Roadless initiative, only if the Roadless Initiative is truly going to maintain preexisting trails within the USFS and areas of “reconstruction”. (Individual, Dover, MN - #7663.91712)

We also protest the Forest Service not maintaining main canyon roads such as the Manti Canyon Road, which is only being maintained, to the camp ground. (Individual, Manti, UT - #11371.71300)

Public Concern: The proposed rule should include provisions to keep trail and road access open for trail dependent competitions.

NON-MOTORIZED

This proposal sounds pretty good on the surface, but where are the provisions which would keep trails and road access to these areas for the recreational bicyclist and the equestrian? Or the access for trails dependant competitions such as competitive trail? (Individual, No Address - #6996.91750)

There are a lot of horsemen and horsewomen out there who love to ride in the parklands. I am against any proposal which would limit:
a) groups riding together
b) people riding in pairs
c) competitions such as competitive trail or Endurance from using the lands. (Individual, No Address - #6996.91730)

MOTORIZED

We also ride in organized events held on Forest lands. These events are called “endures,” and they are closely monitored by the US Forest Rangers. Enduros have been held on US Forest lands for over 50 years. These

events will not be allowed under this "Roadless Initiative." With a long history of excellent land use, I hope you would support the continued use of these lands for the responsible recreation of myself and many like me. The multiple motorcycle clubs across the US have worked closely with the US Forest Service system for many years to assure the safe use of these areas by motorcycle and ATV riders. (Individual, Baton Rouge, LA - #13513.91712)

Public Concern: The Forest Service should reverse its road closure and restriction policy by opening gated roads.

The Forest Service must reverse its road closure policy and restrictions and open gated roads to public access. I have heard many complaints year after year about roads being closed and gated each year for no other purpose than to stop hunters from hunting in these areas. The environmentalists want nothing but complete closure of all human activities on all lands including private owned lands. They will go to any link to get this done, mostly illegally. (Individual, Hamilton, MT - #7260.71300)

I am writing to say that I am against any road closures in our National Forests. All roads that have been closed in the last ten years, should be reopened. (Individual, Ironwood, MI - #2903.71300)

Public Concern: The Forest Service should open blocked roads on National Forest System land in case of fire.

The roads that are blocked off should be opened up on Forest Service land in case of fire. (Individual, Beaver, WA - #8116.84200)

Public Concern: The general public should be allowed access to the same public lands as people with leases or special use permits.

Often a rancher leases public lands and because the only road into the public land crosses the rancher's private property, the rancher can block public access by closing the road. This essentially creates private land out of public land. The rancher can access the public property himself but the public cannot. Either new roads should be cut into these areas, or leases should be changed to force the lessee to provide the same access to the public that the lessee enjoys. It should be simple. If the lessee has foot access, the public should have foot access. If the lessee has vehicular access, the public should have vehicular access. (Individual, Tucson, AZ - #2187.90310)

It is our contention that there is, indeed, conflicting interests that must be reconciled in regard to the hundreds of thousands of acres of national forests that are unavailable to the American public because the Forest Service has seen fit to issue commercial outfitting permits to parties who deny access to portions of the national forest. The result, of course, is that these parties are rewarded for their actions that deny public access. They are, in fact, encouraged by agency policy to continue blocking the public from using the national forests. We believe the Forest Service should issue outfitting permits only for portions of national forest land that are accessible to the public. (Recreational Organization, Billings, MT - #830.91300)

Public Concern: The Forest Service should not allow guides to take four wheelers or horses on logging roads closed to the general public.

Guide licenses should not be allowed to take four wheelers on logging roads. Guides should not be able to use horses. They should walk like everyone else. (Individual, Salida, CO - #8417.64150)

Public Concern: If a road has already been improved to the status of an "all weather" road, access should be granted to the public.

As a person who has enjoyed driving and hiking in National Forests for many years I have a firm belief that this privilege should be continued on roads that meet the following criteria: The road has already been improved to the status of an "all weather" road. (Individual, Sun Lakes, AZ - #10732.71300)

Public Concern: National forest roadless areas should have hiking trails which are not open to vehicle use.

National forest roadless areas should have hiking trails which are not open to vehicle use. Motor vehicles pose a major threat to all wildlife. (Individual, Santa Cruz, CA - #9864.91610)

6.7.3 Motorized Recreation

Motorized recreation encompasses comments about the use of motorized vehicles, off-highway vehicles, snowmobiles, and watercraft on National Forest System lands. This section is further subdivided into the following: 6.7.3.1 Motorized/Off-Highway Vehicle Recreation on Forest Lands; 6.7.3.2 Motorized/Off-Highway Vehicle Recreation in Roadless Areas; 6.7.3.3 Limitations on Motorized/Off-Highway Vehicle Recreation; and 6.7.3.4 Maintenance of Motorized/Off-Highway Vehicle Recreation Trails and Areas.

Public comments reported in 6.7.3.1 address concerns over motorized/OHV recreation on forest lands. People often do not distinguish between restrictions on National Forest System lands in general and perceived restrictions of this roadless area initiative. Many constituents feel the Forest Service should allow continued motorized recreation in national forest lands. Some suggest we need to compromise on this issue. "Add some more roadless areas while at the same time guaranteeing that existing areas remain open to multiple use, such as ATVs," suggests one individual. Others, however, contend that motorized recreation leaves no long-term environmental damage and that as tax paying citizens they have a right to motorized use on National Forest System lands.

Some citizens advise the Forest Service to consider the impacts of vehicle use and the conduct of the users on the National Forest System resources. They contend that vehicle users are often responsible for "vandalism of facilities" and wandering "in search of secluded places for dope use or deals." Such concerns prompt some members of the public to recommend that the Forest Service designate roaded areas that can be sacrificed for destruction by off-road vehicle uses. Similarly, others believe the Forest Service designate such areas but rotate them when signs of environmental damage occur.

A few respondents suggest that the Forest Service implement a series of linked trails for off-highway vehicle access. Some argue, however, that motorized recreational use should be restricted. Others say the Forest Service should eliminate off-road travel all together. These members of the public claim that OHVs "spew out air pollution, pollute the ground," and "destroy the ecosystem by fragmenting the land." They say that by banning OHVs we are taking "a step that might help our national forests recover." These respondents proclaim that

OHVs degrade the value of experiences on national forest lands. "The sound of a two-stoke engine whining through the woods is not what I want to hear when I go hiking or bird-watching in national forests," professes one person, a concern echoed by many non-motorized users.

Proponents of snowmobiling aver that the Forest Service should allow snowmobiling on national forests. Some constituents are particular concerned with being forced to adhere to "snowmobile trails." They contest that "once you have five to twelve feet of snow, there is no such thing as a trail." Furthermore, if snowmobiles are constrained to groomed trails, the Forest Service "will kill snowmobiling in the West." Others request specifically designated and developed winter motorized trails for snowmobilers to minimize illegal entry and reduce safety hazards. One individual would like the status of off-road motorized travel in the Wayne National Forest to be clarified.

Comments reported in 6.7.3.2 address motorized/OHV recreation in roadless areas. Many people express strong emotions about this topic. A great number of respondents believe such recreation should be allowed. One individual states "ALL ACTIVITIES INCLUDING MOTORIZED RECREATION, INCLUDING 4 WHEEL DRIVE (JEEP TYPE) VEHICLES MUST BE ALLOWED TO CONTINUE ON ALL ROADS AND TRAILS IN THE AREAS DESIGNATED ROADLESS." Others feel the Forest Service should honor traditional OHV use by allowing them to continue recreating in certain areas. On the other hand, several environmental groups feel OHVs should be prohibited, suggesting that a mere "visual survey" will "reveal the destruction they have caused." Many people feel OHVs should be immediately banned on National Forest System lands. "Dirt bikes and other off-road vehicles should be barred from roadless areas NOW, not addressed later," writes one individual.

Several respondents also support banning watercraft and powerboats in roadless areas. They feel watercraft and powerboats should be restricted to certain areas outside of roadless areas. Likewise, many people argue the Forest Service should ban snowmobiles from roadless areas. Conversely, others want assurances made that snowmobile recreational activities will not be impacted.

Comments reported in 6.7.3.3 address limitations on motorized/OHV recreation. Many respondents are concerned over the Forest Service's failure to restrict off-highway vehicles use in the proposed rule. Some ask the Forest Service to justify its reasoning for not including such restrictions. Many others, however, ask the Forest Service to include such restrictions in the rule or to initiate a separate rulemaking to address this issue. Respondents agree it is time to establish clear and permanent guidelines for OHV use.

Many other respondents, however, believe off-highway vehicle use should be evaluated on a case-by-case basis. Three methods of reducing motorized vehicle conflicts are mentioned, including spatial separation, limitations on the numbers of users, and seasonal limitations. One motorized user, for example, proposes that the Forest Service divide national forests in half with one side open to off-road vehicle use and the other closed to off-road vehicles. Some members of the public suggest limiting the number of motor vehicles with a permit

system. Another suggests that the Forest Service should limit the hours during which off-road vehicles may operate during hunting season to limit user conflicts and damage by OHVs.

The public is also concerned with pollution and noise created by motorized vehicle recreation. Several respondents advocate that the Forest Service require the use of lower-emission off-road vehicles. To that end, some individuals request that the Forest Service set reachable goals and mandates for pollution and noise and gradually institute these policies. The Forest Service should place more restrictions on personal watercraft, such as jet skis, some believe, and many specifically support a ban on two-stroke engines. In contrast, a few individuals do not want to see any more restrictions on two-stroke watercraft engines.

Most individuals who comment on the topic of designated routes prefer restricting motorized vehicles to designated routes, however opinions differ as to whether they should be confined to trails or roads. In addition, opinions differ about whether to implement a "closed unless signed open" policy on National Forest System lands. Some respondents support it, while others are opposed.

Comments reported in 6.7.3.4 address the maintenance of motorized/OHV recreational trails and areas. Many groups request the Forest Service to recognize and encourage more volunteer work by the OHV community in road and trail maintenance programs. "I am extremely disappointed by the refusal of the Forest Service to recognize the countless hours of volunteer time I, and others like me, have spent to maintain OHV sites in our area. Continued failure to recognize the many contributions of the OHV community will only serve to punish those who are actively working toward a solution to a symbiotic relationship between recreation and conservation," writes one individual. Some people believe the Forest Service should require that OHV groups adopt and maintain trails to standard to prevent closure.

On the other hand, several individuals feel the Forest Service should not maintain roads because recreational users enjoy the challenges they provide. One individual states, "We like the existing roads (trails, byways, passages, and whatever else you may call them) the way they are, in their poorly maintained state."

6.7.3.1 Motorized/Off-Highway Vehicle Recreation on Forest Lands

Public Concern: The Forest Service should allow continued motorized recreation in national forest lands.

What we could use is more multiple use trails for ATVs, snowmobiles, horses, biking and hiking. We could also designate backwoods recreation areas. (Individual, Sheridan, WY - #3512.91700)

As an avid outdoorsman, as well as an environmentalist, I fully support the responsible usage of OHV and motorized recreational activities on these lands, given proper guidelines and planning. As a taxpayer I strongly believe that portions of these areas in each locale should be made and remain available for OHV recreational purposes. (Individual, Chandler, AZ - #476.91710)

Do the right thing. Create more opportunities for outdoor recreation on federal lands, including motorized recreation. (Individual, No Address - #1554.91710)

Sure I like to hike even backpack. But there are a lot of people who do not or cannot. What about them are they only going to be able to see these lands from the outside? I think if you do not let people enjoy the land by snowmobiling, motorcycling or just off-roading on roads they will not see it. So in the long run people will not appreciate the forest because they can never go there unless they walk in. (Individual, No Address - #3957.10210)

We need to compromise by adding some more roadless area while at the same time guaranteeing that existing areas remain open to multiple use, such as ATVs and horses etc. (Individual, No Address - #8.91700)

IT CAUSES NO LONG TERM DAMAGE

I believe the off road community does minimal impact to the land. I have seen trails disappear in a matter of several years which have been abandoned due to a fallen tree or such, showing there really is no long term damage. (Individual, No Address - #6292.80000)

I support existing use of trails in the forests in Colorado. I enjoy a trailbike/rockhounding use and do not want new steel gates keeping me from areas I've previously enjoyed, all by using existing jeep roads. I stay on the trails. My bike is street legal with spark arrester, just as the manufacturer delivered. I feel if these machines are properly used, the damage to [the] environment is not a problem on roads that are many years old. (Individual, Wichita, KS - #7605.10212)

This letter is in regards to the possible land closing to OHVs. I have been riding off road vehicles for about 25 years now. I have not been able to ride places like Colorado or Utah or any place that might be considered to be closed by this law. I don't really understand what is trying to be accomplished by this. They say that this land is getting destroyed by OHV's, which I find hard to believe. There is just not enough of us to destroy this much land. I feel that this is being done, because it can be. This might be because we are a small group, and that getting this passed might look good on some politician's resume. If, the government was genuinely trying to accomplish something, like saving our environment, wouldn't their (I mean our) money, and the earth be better off having them do something that actually made an impact. There are many ways to make a great impact other than eliminate something that probably adds up to an ant hill. What I mean by this is I can't believe that every new mall, highway, housing development, every factory pouring out smoke, every jet airliner leaving a gas tail behind it and the list goes on, isn't being nailed to the cross like OHV riding is. (Individual, No Address - #13267.91712)

Public Concern: The Forest Service should consider the impacts of vehicle use and the conduct of the users on the National Forest System resources.

For more than 28 years I have watched the increasing vehicular use of the National Forest lands close to my home. Easily 70% of this use is just mindless wandering; often in search of secluded places for dope use or deals. Vandalism of facilities, sign and anything else that comes easily to hand is never ending. These are NOT the quiet kind of forest lands that I used to hunt and hike with my father sixty years ago.
In those days we did not need, even if we could have afforded, ATV's, 4-wheel drives or snow-mobiles. I do not remember seeing beer bellies on the back-woods people of my youth. They walked or rode horseback. (This included the rangers of that time.) We did not go hunting or fishing in order to be drunk or disorderly. I do remember campers in the 1930's getting together and singing around their campfires. Now it's Boom Boxes, Beer and Blast. As to the modern "outdoorsmen": they constantly confirm the statement, 'No one ever went broke underestimating the bad taste of the American public.' (Individual, Jackson, WY - #7126.90200)

Public Concern: The Forest Service should designate roaded areas that can be sacrificed for destruction by off-road vehicle uses.

Designate sites within the National Forests, excluding inventoried roadless areas, for sacrifice to ORV users. These should be designated destroyable properties. (Individual, Houston, TX - #8305.91712)

SET ON ROTATING BASIS FOR OFF-ROAD MOTORIZED RECREATION

I don't think all ATVs should be banned…but maybe work a way out where you can designate areas to ride for a while and then when the damage starts getting bad change it to a different area and let the old growth back. Just set up signs, or let the public know by maps at one of your offices where riding is allowed and not allowed. (Individual, Brookport, IL - #3182.91612)

Public Concern: The Forest Service should implement a series of linked trails for off-highway vehicle access.

While I enjoy being able to hike, cross-country ski and mountain bike in areas where motorized vehicles are not present, I think it is very important that there are a series of linked trails that are open for off highway vehicle access. (Individual, Sonoma, CA - #7000.91700)

Public Concern: The proposed rule should restrict motorized recreational use.

We wish to restrict off-road vehicle use to control damage to roadless areas. (Individual, Bishop, CA - #2717.83000)

Self interest groups, such as snowmobilers, four-wheelers, etc. show little concern for anything other than their own activities. (Individual, No Address - #6950.41000)

Public Concern: The Forest Service should eliminate off-road travel.

Although I love motorcycle riding, I also love the beauty that only nature can provide. I have seen the damage that responsible and irresponsible riders of dirt bikes and the like have done to natural areas. Besides digging up the soil, causing erosion problems, these vehicles destroy plant life, and disturb animal life. The sound of a two-stroke engine whining through the woods is NOT what I want to hear when I go hiking or bird-watching in a National Forest. These vehicles also spew out air pollution and pollute the ground and water when there is an oil, grease, or gasoline leak. (Individual, No address - #1222.91000)

As you know, there is a powerful industry behind this—the manufacturers of the new equipment and the oil industry. The "Wise Use Movement", especially the Blue Ribbon Coalition, influence so-called 'sports' people to "take back your land." Our national forest and BLM lands belong to all the people and no one group should be allowed to invade and cause damage to them. (Individual, No Address - #6058.41700)

Roads help to destroy the ecosystems by fragmenting the land and making it available for logging, mining, all-terrain vehicles, off-road vehicles, etc., which end up with the loss of watersheds and riparian areas just to name two delicately balanced systems. (Individual, Albuquerque NM - #7519.83000)

Banning off-road vehicles would be an additional step that might help our National Forests recover. I frequently see rare and beautiful wild plants destroyed by vehicles in our forests. I personally witness areas of erosion that destroy hillsides. (Individual, Idaho Falls, ID - #7170.83000)

When I think of how the wildlife and watersheds are corrupted and contaminated by these vehicles it makes me sick. Let's protect the habitat, maintain wildlife diversity and restore declining stocks of threatened fish such as our salmon. (Individual, Bellingham, WA - #8331.83000)

Public Concern: Snowmobile use should be allowed in the national forests.

We request that you manage the forest with consideration to the snowmobiler. We request that you enhance our opportunities, not reduce them. (Recreational Organization, La Pine, OR - #6739.9173)

OFF-TRAIL TRAVEL

As to snowmobiles, once you have 5 to 12 feet of snow, there is no such thing as a trail, except where grooming equipment has covered major road areas and marked them as trails. We live in the West where there is deep powder. We ride groomed trails ONLY to get to the good snow. There are some snowmobiles built just for trail riding. We ride sleds built for deep powder. If snowmobiles are banned from all areas except groomed trails, you will kill snowmobiling in the West. Is that your intent? (Individual, Hyrum, UT - #2927.91713)

Public Concern: The Forest Service should develop continuous trail systems for snowmobilers to minimize illegal entry and reduce safety hazards.

If we are not allowed to go through national forests in winter via snowmobile, it will force snowmobilers to either enter illegally or go around via plowed roads. One of our main goals in having a continuous trail system is to keep snowmobilers in the areas designated for their use. If we can't do that, we will have a lot more safety issues. We don't want snowmobilers running down a plowed road with automobile traffic. People will be hurt and killed. That's a proven fact. (Individual, No Address - #9912.91200)

Public Concern: The Forest Service should clarify whether the Wayne National Forest is slated to be closed to off-road motorized access.

Please inform me of the status of the Wayne National forest and off-road motorcycle access. I understand there is a move afoot to close this area to riding? (Individual, No Address - #15421.10212)

6.7.3.2 Motorized/Off-Highway Vehicle Recreation in Roadless Areas

Public Concern: The Forest Service should allow motorized off-highway vehicle recreation in roadless areas.

I am concerned that our President's Roadless Initiative will result in the permanent banning of many forms of vehicular off-highway use. (Individual, No Address - #563.91700)

Language providing explicit support for preservation of ALL recreational values should be included in the proposed rule as well as values, INCLUDING OHV recreational values. (Individual, Moses Lake, WA - #7991.91000)

The 'easy' and uncreative option of simply closing the forests to OHV use is counter to multi-use, is draconian in its impact to small communities and small businesses that depend on the OHV industry, exposes the USFS to litigation, and is unnecessary! (Individual, Littleton, CO - #134.91712)

We are very clean and respectful of nature. We take great pride in our ability to commute with wildlife and see the beautiful sites when we stop. We would be devastated to learn that we could no longer enjoy our time outside of the city. We do not cut down trees (could you see us with a chainsaw hooked to our backs riding down a trail), we do not go off the trails unless absolutely necessary (e.g. a fallen tree blocking the path). We are careful not to cause any kind of disturbance to the beauty we see around us. It is a time for my family to come together and enjoy life and nature and the beauty it has to offer. We (and I believe I speak for all riders) do not appreciate the Sierra Club lumping us in with destroyers of nature, such as loggers, miners, freeway builders and deforesting companies. Those who do not ride do not understand the deep respect we have for our surroundings when we are on the trails, the love we have for nature, and the appreciation we have for the experiences we take back with us. (Individual, No Address - #1176.91712)

If this…dictation to the American public is adopted, I want it written in ALL ACTIVITIES INCLUDING MOTORIZED RECREATION, INCLUDING 4 WHEEL DRIVE (JEEP TYPE) VEHICLES MUST BE ALLOWED TO CONTINUE ON ALL ROADS AND TRAILS IN THE AREAS DESIGNATED ROADLESS. (Individual, Vonore, TN - #5713.91700)

Does this initiative close down the designated OHV riding areas I've been riding in almost my entire life in Troy Meadows (Sequoia Nat. Forest) and the forest trails of Los Padres Nat. Forest coming out of the Hungry Valley SVRA area? I find it absolutely repulsive what's being done. These are virtually the only areas left open to ride in other than the desert (which is also under attack in the West Mojave Plan). (Individual, No Address - #1756.91712)

In many areas that people off-road, it has been going on for 80 years. Leave these areas open. Do not close them down. Simply designate other areas to never be able to off-road in ever. Nobody wants to off-road in Yosemite, for example. (Individual, No Address - #2513.91712)

This whole thing is bogus, especially in the area of restricting/forbidding recreational vehicles. It smacks of bureaucracy, and should have much more study by an impartial, objective committee. Recreational vehicles can be modified. With little cost, to adhere to emission standards if need be. (Individual, Auburn, WA - #6770.91710)

Public Concern: The final EIS should prohibit off-highway-vehicles in roadless areas.

It is also stated in the DEIS that there is insufficient data on the impacts of ORV use on roadless forest areas on which to base a National prohibition. A science based study is not needed to determine this impact. A visual survey of the areas that have been used year after year by these vehicles will reveal the destruction they have caused to the trees, other vegetation, waters and the habitats of some wildlife. (Environmental/Preservation Organization, Pensacola, FL - #15067.91612)

Public Concern: The final rule should immediately ban motorized off-road vehicles from roadless areas.

Dirt bikes and other off-road vehicles should be barred from roadless areas NOW, not addressed later. (Individual, Cedar Mountain, NC - #485.10110)

I've recently learned about the Roadless Area Draft Environmental Impact Statement for the protection of the last remaining unspoiled lands in our nation. However, I feel that this statement is flawed in the following ways: Postpones all decisions regarding off-road vehicle use. (Individual, San Rafael, CA - #872.64252)

During the last few years, the local forest, the Medicine Bow, has been transformed primarily into a tree farm and a race track for high speed snowmobiles and turf-destroying ATVs. I would like to see an oval track set up

for these machines in a sacrificial area outside the forest, and ban these machines from the forest. (Individual, Laramie, WY - #3604.91610)

As a small business owner and longtime resident of the High Sierra, I am writing to express my support for the strongest possible restrictions on off-road vehicles on our public lands. By off-road vehicles, I refer to snowmobiles, ATVs and dirt bikes, whose sole recreational purpose is for motor speed sports on these public lands; and do not mean to restrict access to public lands (other than to wilderness) on existing recreational easements by vehicle for hikers, packers, horsemen, fishermen, skiers, campers, photographers, bird watchers, bicyclists and other persons. (Individual, Markleeville, CA - #236.10100)

The primary threat to public wild lands in the 21st Century is Motorized Wreckreation. Because the preferred alternative fails to address this issue, it is itself spineless, gutless and worthless. . . (Environmental/Preservation Organization, Bend, OR - #8301.91610)

The roads already crisscross this great nation. And, there is ample opportunity to exploit motorized vehicle recreation. All-terrain-vehicles should be limited to currently existing, private land. (Individual, Belding, MI - #2886.64150)

Please...There is no such thing as an ATV path. It's just a small (for now) road.
Ban all motorized vehicles from Roadless and Wilderness areas! (Individual, Whitefish, MT - #6435.91610)

I think there are a lot of obligations more pressing than for the government to provide [ORV users] with the number of trails they would prefer on public lands. One of the speakers actually owned a private ORV park--it would seem to me that would be the best way to provide more space for ORV's as it was mentioned at our meeting that ORV use drives off other uses--their areas of recreation become, in fact, exclusive. (Individual, Greenville, SC - #12160.91000)

BAN WATERCRAFT AND POWERBOATS

The use of mechanized off-road vehicles should be restricted to properly designated areas outside the roadless area reserves. This should include the use of personal watercraft and powerboats. (Individual, Albuquerque, NM - #10780.91600)

I currently live in Southern California. While I love the water, and boating, I do not enjoy the noise or pollution of off road vehicles, or jet skis, or snowmobiles. These must be managed and quarantined to specific areas to ensure lasting beauty and wildlife for all. (Individual, No Address - #6652.91600)

Public Concern: The Forest Service should ban snowmobiles from roadless areas.

Roadless areas should be free of road building, logging, mining and the incursion of off-road motorized vehicles, including snowmobiles. (Individual, Mill Valley, CA - #972.64150)

Public Concern: The proposed rule should clearly define how snowmobiling and snowmobile trails will be effected.

Last week I participated in a snowmobile administrators meeting in New Hampshire. Also in attendance were many Forest Service people from Washington, DC as well as Federal Highway and Fish and Wildlife people. We were assured that the roadless initiative would not affect snowmobiling and that a snowmobile trail is not a road. (Individual, La Pine, OR - #6739.42000)

Last November I attended a luncheon in Washington DC where the speakers were Jim Lyons, Assistant Secretary of Agriculture and Chief Mike Dombeck of the Forest Service. Chief Dombeck talked about

snowmobiling in the Midwest where he grew up and again stated that he did not see the roadless issue as affecting snowmobiling, and he didn't see any cause for concern. Again we would like assurance from the Deschutes that this is so. (Individual, La Pine, OR - #6739.42000)

6.7.3.3 Limitations on Motorized/Off-Highway Vehicle Recreation

Public Concern: The Forest Service should justify its reasoning for failing to restrict off-highway vehicle use in the proposed rule.

We are concerned about the failure to exclude roadless areas from off-road vehicles. ORV riders already have access to more than 380,000 miles of National Forest routes and yet little information is provided as to the impacts of these vehicles on roadless areas. The Forest Service dismisses concerns about ORV impacts to roadless areas stating that "…decisions of this nature are better made through local planning and collaboration processes." (DEIS p. 3-121) ORV impacts are a national problem that must be addressed at a national level. (Environmental/Preservation Organization, Plymouth, MN - #51067.91610)

After reading about your service Draft released on May 9th, I feel somewhat less threatened by the roadless initiative begun (in my opinion unlawfully) by the Clinton Administration. By not banning motorized travel entirely, it appears that perhaps someone is beginning to give some thought to the mandate of Congress. At the same time, I have to wonder whether this is not just a political move to stave off some of the criticism directed at you because of the initiative. (Individual, Bracey, VA - #2185.41100)

Public Concern: The Forest Service should incorporate nationwide restrictions on off-highway vehicle use into the proposed rule or should initiate a separate rulemaking process to regulate such use.

The Forest Service should either incorporate nationwide restrictions on OHV use within the proposed roadless area conservation rule, or expeditiously initiate a separate rulemaking proceeding to regulate the use of OHV's. (Individual, Santa Monica, CA - #16735.64150)

In my opinion, you have insufficiently addressed the problem of ATV's in roadless areas. Having just come back this afternoon from a jaunt where several young people on ATV's were leaving a terrible dust cloud and a great disturbance of the soil, I am reminded that unrestrained use of off-road vehicles seems to be looming as the next big issue regarding forest lands. You might want to get ahead of the curve by deciding that this particular use, with its large potential for disturbing the wildlife, the landscape, and the human peace and quiet, might appropriately be a subject for consideration in this proposed rule. (Individual, Camp Sherman, OR - #6122.91612)

I would hope that before the final draft is accepted, it will be revised to address the growing problem of ORV use on our public lands. (Individual, Preston, ID - #7648.91612)

The proposed rule is flawed in asserting no clear direction on the rapidly-escalating proliferation of off-road vehicle (ORV) traffic--often unplanned--into wild and roadless natural landscapes. Off-road vehicle traffic is THE activity with the "greatest likelihood of degrading desirable characteristics of inventoried roadless areas" throughout Montana and the Rocky Mountain West. Eight of the nine listed roadless characteristics are adversely affected by unplanned off-road vehicle traffic in large inventoried roadless areas. The speed of landscape transformation from remote, roadless and pristine is too rapid to wait another 8-10 years for completion of forest planning in Montana forests. (Individual, West Glacier, MT - #52497)

We [the Izaak Walton League of America] feel that the agency should establish national guidelines to assist local Forest Service officials make sound management decisions regarding when and where use of OHV should be permitted. We are not persuaded that unroaded portions of inventoried roadless areas are generally an

appropriate location for such an activity, particularly given the enumerated roadless area characteristics that the proposed rule is designed to protect. Accordingly, we urge the Forest Service to either incorporate nationwide restriction on OHV use within the proposed roadless area conservation rule, or alternatively to expeditiously initiate a separate rulemaking proceeding to regulate the use of OHVs within unroaded and roadless areas of the National Forest System. (Preservation/Organization, Saint Paul, MN - #15272.71230)

Public Concern: The Forest Service should establish clear and permanent guidelines for the use of off-highway vehicles on public lands.

The outcry that motorized access will be severely restricted is unfounded. Off-road users have more than enough roads on which to recreate, and have been encroaching on true wilderness areas on a regular basis. Unfortunately due to new technology, both on and off the snow, off-road vehicles now have the capacity to go farther, steeper, etc. than before and the users tend not to respect the boundaries that are in place for good reasons. Look at the high incidence of avalanche related accidents with snowmobilers and this lack of respecting logical boundaries becomes very clear. Regardless of the result of this initiative, the USFS needs to establish clear and permanent guidelines for the use of off-road vehicles on public lands. (Environmental/Preservation Organization, Seattle, WA - #958.91610)

I am writing in favor of a serious plan to restrict additional roads and to manage the roads we have. I am a long time visitor of Inyo and other Forests. I have found wide spread "abuse" of existing areas by those with SUV's. The idea of opening up more areas to them especially without proper supervision and management will be catastrophic.
On San Joaquin Ridge there are inspirational views of Mtns. Banner, Ritter and the Minarets. Not to mention the Eastern border of Yosemite. There is already a road along this ridge. Until recently that road was traveled occasionally by the 4WD vehicles. It is mostly used by hikers. In recent years mountain bikes have been added with the Mammoth Bike Park. But in the last two years with an increasing push by the visitor industry in Mammoth, there have been more SUV's.
This ridge is made of mostly fragile volcanic pebbles. The climate is extreme and exposed. The flowers that manage to grow have taken years to develop with these special high altitude conditions.
The road has no provisions for turning, parking or restrictions. As a Result I have witnessed the tire tracks of many vehicles all over the area, NOT ON THE ROADS. I have seen the drivers go up the ridge, past us hikers, never get out of their vehicles, never even open the window, turn around in a "virgin" space and go back down. What they leave is a tire "ditch" that will not be leveled for years. Not to mention the ruination of the plants, these folks never even saw.
To fix this situation all the FS has to do is to stop the vehicles below the final hill and allow them to park in a non-fragile area. For the most part they would already have seen the views from other protected areas. There is no room for a "parking lot" or turn areas on the top of the ridge.
Right now it is difficult enough to monitor what happens in the Forests. Now that the "public" has this great access, thanks to the SUV craze, tough management restrictions must be put in effect now before more destruction occurs. (Individual, Oakland, CA - #5154.91612)

Public Concern: The management of off-road vehicles should be evaluated on a case-by-case basis.

Off-road vehicle use may be appropriate in some cases but must be carefully evaluated on a case-by-case basis. (Individual, Edmonds, WA - #5643.91610)

I…ask that you consider removing all language regulating OHV use except in those specific instances where OHV use is shown to be a problem, and when so found to provide language allowing for temporary closures instead of outright exclusion. (Individual, Seattle, WA - #351.61300)

Public Concern: The Forest Service should divide national forests in half with one side open to motorized vehicle use and the other closed to motorized vehicles.

If we have to come to a compromise with the environmentalists then split the forest in half with a boundary line on a map that states motorized vehicles in this half ok and this half banned. (Individual, No Address, - #18978.63000)

Public Concern: The Forest Service should consider a permit system to limit numbers of motor vehicles.

Some alternatives: limit access based on acceptable impact; only so many vehicles for a given period of time. Reservations may be required for the most popular perhaps. Yes, my usage too would be limited but at least I am afforded the opportunity to enjoy it, which I would not if there were no roads at all. (Individual, No Address - #2318.60000)

I am concerned about this proposal, future proposals to come, and the current bans on some recreational activities in national forests. Let me start with saying that while I am a snowmobiler it was clear that there were problems in some of the National Forests and that something had to be done. My question is why just an outright ban? Why not the more reasonable alternative which is to limit the number per day, per week, to take care of the problem. At some level the nature of the problem becomes not only livable but viable. Then the people who wish to access these parks would simply have to apply for a permit based on some type of lottery system, similar to what many states do for hunting licenses, the technology is already available, it's not like you would have to invent the wheel! I know that many of these parks limit how many vehicles (i.e. cars) can enter or be in the parks at one time, why not the same for other types of recreational activities? (Individual, Boulder, CO - #2995.61300)

Public Concern: The Forest Service should limit the hours during which off-road vehicles may operate during hunting season.

I would also like to see some sort of rule passed that would limit the hours these off-road vehicles can be operated during the hunting seasons. Something on the lines of limiting their use to the hour before sunrise and the hour after sunset would go a long way toward the curtailing of the abuse these things do. With these limits, people could still use them to access their hunting areas, but the rest of us could have peace and quiet during the day. (Individual, Peetz, CO - #12932.64150)

Public Concern: The Forest Service should require the use of lower-emission off-highway vehicles.

The high emissions rate spewed by [off-road vehicles] must be addressed, why do we allow a vehicle with 30 times the emissions of a standard car to pollute our public lands? The technology is there to produce quieter, cleaner burning engines and the government should set requirements to ensure that the vehicles that do travel on designated off-road trails create as little impact as possible. (Environmental/Preservation Organization, Seattle, WA - #958.91610)

I would rather see use required to use quieter and/or cleaner motorcycles like 4-strokes or have tighter emissions requirements rather than an absolute reduction in access. I don't want to be limited to small OHV parks. I want to responsibly enjoy the outdoors. (Individual, Newark, CA - #7292.91700)

As an alternative to shutting motorcyclists out of these areas, I would propose something similar to what the state of California has done in the last few years, and that is restrict the access of two-stroke motorcycles to recreation in that state. They cause the vast majority of the noise and air-pollution as far as motorcycles go, and targeting only those vehicles would still allow for the enjoyment of this recreation of choice by others. (Individual, Thibodaux, LA - #6329.91712)

I agree with the environmentalists that 2 stroke engines are inherently much more polluting than modern cars. Just how much more polluting seems to be still in dispute. Also unproven is just how much this pollution degrades the environment in the affected areas. Also, there are technological ways to bring very large reductions in this pollution. These methods deserve to be investigated before the machines are completely banned. (Individual, Auburn, WA - #17820.91500)

BY SETTING REACHABLE GOALS AND MANDATES FOR POLLUTION AND NOISE

If you feel it is your job to protect the forests, why have you neglected it for so many years? You have gone from no management to reckless management. If you had been doing your job all these many years, you would have set reachable goals and mandates for pollution and noise, etc., manufacturers would have responded like the auto industry and, over many years, would have improved the OHV….The forests definitely need to be better managed. The problems developed over decades. Do not try to solve the problems in big gulps; you could choke to death on such a big bite. Careful, planned, progressive management, working with OHV industry and the taxpayers will eventually resolve the problems. (Individual, Hyrum, UT - #2927.71230)

Snowmobiles do not carve up the land as do ATVs. Of course, snowmobilers must be careful not to damage trees which are above the snow level. Our new 2000 year sleds are quieter than ever. We believe the manufactures can make them even quieter. It is not unreasonable to even ban after-market exhaust systems which increase noise. Noise reduction can and should be a goal--not the closing of forests to snowmobiles. As to pollution, snowmobiles are all 2-stroke engines. The manufactures can easily make 4 stroke engines for trails, but they would never have enough power to work in deep powder. Yet, there are synthetic oils and other devices which can reduce pollution. When automobiles polluted, they were not banned. Instead, the manufacturers were given mandates and deadlines to gradually improve the emissions. (Individual, Hyrum, UT - #2927.83000)

Public Concern: The Forest Service should place more restrictions on personal watercraft, such as jet skis.

I would also like to see more limitations put on personal watercraft (jet skis) for the sake of quietness and to avoid detrimental effects on lake ecology. Anything that can be done to enforce laws prohibiting motorized recreational vehicle usage would be greatly appreciated. (Recreational Organization, Minneapolis, MN - #10151.91650)

Public Concern: The Forest Service should not limit use of 2-stroke watercraft engines.

I have recently had my fishing boat banned from the lake (2-Stroke Ban on Lake Tahoe) Please do not take any more outdoor recreation away, there is not much left for me to enjoy. (Individual, No Address - #7064.91750)

Public Concern: The Forest Service should restrict motorized vehicles to designated routes.

Rampant off-road vehicle (ORV) abuses in designated roadless areas must be stopped. Many “ghost” roads are used by ORVs with resultant damage to soil resources, wildlife, and unnecessary loud noise. Damage to soil is

especially serious where use occurs when the soil is wet. ORV use should be restricted to designated routes where damage is and can be controlled. (Individual, Driggs, ID - #6846.91612)

According to the Draft Environmental Impact Statement on Forest Service roadless area conservation issued on May 9, 2000, off-road vehicles will not be prohibited from using existing routes in our National Forest roadless areas. That is wrong! Consider this one example of one National Forest that I live near. the Chippewa which has 675,000 acres of forest land but has only 77 acres in 3 separate parcels that are roadless. Are you suggesting that the proliferation in recent years of off-highway vehicles can run roughshod on these abandoned forest roads?? That is an irresponsible avoidance of a very destructive activity. In many cases this activity is far worse than the original intent of the road for hauling logs! I'm not suggesting there should not be trails provided for off-highway vehicles. There should be designated and monitored trails where monies from these activities would be derived from. (Individual, Bemidji, MN - #8324.91612)

Some parts of the forest should be managed for motorized recreation--OHVs, snowmobiles, and downhill skiing--with recreation areas and trails paid for by users through the permit systems that are in place. This type of recreation should not be banned from any of the National Forests, but should be restricted to well-marked, designated areas. (Individual, Missoula, MT - #6992.91710)

Public Concern: Off-road vehicles should be allowed only on designated and signed official trails.

One of the most serious threats to the national forests comes from off-road-vehicles. The use of these vehicles, especially in the open woodlands of some national forests in particular, such as the Humboldt-Toiyabe, is creating trails at an alarming rate. In many cases such trails are as damaging to forest resources as are roads. Once established and used over years leading up to plan revisions, the probability exists for having such destructive trails cemented into transportation plans during the plan revision process. This is because inordinate pressure can be brought to bear by those who have become accustomed to using these trails. There needs to be national direction to allow off-road-vehicle use only on designated and signed trails with roadless areas in the interim leading to plan revision, even if it means immediate revision of a forest travel plan. (Individual, Bolder City, NV - #1039.64150)

Public Concern: The Forest Service should restrict off-road vehicles to established roads only and ban them from trails.

The ORV issue has to be addressed on Forest Service roads only, not trails….Montana State lands and BLM restrict ORVs to established roads, so should the Forest Service. (Individual, Whitefish, MT - #4917.91612)

Public Concern: The Forest Service should adopt a "closed unless signed open" policy effective as soon as possible.

We need to implement a national rule that closes national forest lands to off road vehicle use except where routes are signed open. This is not a suggestion for increased restrictions: rather it is intended to make it easier to keep OHV's where they are allowed. Making "closed unless signed open" a policy or guideline is not enough--it should be a rule, made effective as soon as possible. Without it the roadless area rule will only be partly effective in meeting its stated objectives. The forests will continue to have inadequate control over use of motor vehicles off designated routes. Roads will continue to develop in many areas, as ATV's get bigger and go farther into the backcountry. As their pioneered routes become established two-tracks they invite larger vehicles such as jeeps to try the route, then full sized trucks. We've seen this in many places in areas managed for non-motorized uses (including wilderness).

The Forest Service has tried to keep travel management signs in place, but many of the closure signs get torn down as soon as they are installed. In the meanwhile, trails are turning into roads and cross-country vehicle use is damaging to vegetation and soils and displacing traditional non-motorized use.
The solution, if we really want to keep the roadless areas roadless, is to put in place a national standard that says forests are closed to off road motor vehicles except where signed open or shown open on a travel map. This will reduce the destruction of signs (as well as the resulting waste of tax dollars needed to continually replace them). It will allow for the individual forests to continue to manage for motorized trail uses, but in a more effective way. I hope that this will be seriously considered. (Individual, Jackson, WY - #6870.91612)

Let us put up signs designating areas that are open for motorized use, so motorized users of the forest will understand where they can drive and that the rest of the forest is off-limits for driving. (Individual, Basin, MT - #3645.91100)

Public Concern: The Forest Service should not develop or implement a nationwide policy of "Closed Unless Posted Open" for off-highway vehicles.

It has been most disturbing for me to find out that you may be developing a nation-wide policy of "CLOSED UNLESS POSTED OPEN" for off-highway recreation on National Forest lands. I understand that this policy, if implemented, would affect not only motorized recreation access but mountain bikes and equestrians as well. My family and I enjoy backcountry recreation in our National Forests. We use primitive roads and trails and are adamantly opposed to a "CLOSED UNLESS POSTED OPEN" national policy. (Individual, Farson, WY - #15241.91700)

6.7.3.4 Maintenance of Motorized/Off-Highway Vehicle Recreation Trails and Areas

Public Concern: The Forest Service should recognize and encourage more volunteer work by the off-highway vehicle community in road and trail maintenance.

I am extremely disappointed by the refusal of the Forest Service to recognize the countless hours of volunteer time I, and others like me, have spent to maintain OHV sites in our area. Continued failure to recognize the many contributions of the OHV community will only serve to punish those who are actively working toward a solution to a symbiotic relationship between recreation and conservation. (Individual, Canon City, CO - #1103.44020)

As for us ORV (motorized) enthusiasts, many of us voluntarily maintain our trails to protect against erosion and water pollution, and I think we're successful. (Individual, Asheville, NC - #832.44020)

We are told that there is a backlog on road maintenance throughout the Forest Service. We have been trying to help by asking for use of fire lanes and roads in the forest to ride on with OHVs. In return we will give our time to clean and maintain roads two to three times a year. (Recreational Organization, Tell City, IN - #1031.44020)

The Montana Trail Vehicle Riders Association and other local OHV groups provide all maintenance of the erosion-avoiding trail system in the Little Belt and Highwood Mountains. Our machines were quiet and four stroke machines will soon predominate. We know to wash our machines regularly to avoid spreading noxious weeds, and we actively participate in weed eradication activities. (Individual, Great Falls, MT - #2810.44020)

Public Concern: The Forest Service should require that off-highway vehicle groups adopt and maintain trails to standard to prevent closure.

Make OHV and other recreational use a higher priority in the Roadless DEIS, with language that clearly states the goal of preserving traditional usage and access--simply no new roads (without compelling reasons, but allowing them under forest management justification), but clearly allowing and even encouraging (where justified by demand) carefully maintained trails. These OHV trails and four-wheel-drive trails could be required to be sponsored by private groups that use them, with clear measurable standards of maintenance that address water quality, erosion, and other impacts, while preserving recreational values. If no one cares enough to sponsor the road or trail, then close it after an appropriate probationary period. (Individual, Littleton, CO - #1219.61300)

Public Concern: The Forest Service should not maintain roads because recreational users enjoy the challenges they provide.

We do not need nor want any federal nor state sponsored road maintenance nor building of new roads. We like the existing roads (trails, byways, passages, and whatever else you may call them) the way they are, in their poorly maintained state. We leave them much the same as they were, save for a few rocks moved and some tire tracks. Tire tracks in sand of course disappear with the next wind. Each year it's interesting to see the effects of the rain, wind and weather on these roads. They are different every year. These roads date back over a hundred years, and in some cases, date back to before California became a state. These roads carry a reasonably small, but important amount of traffic. (Individual, Gardena, CA - #1755.71300)

There should be more roads and especially trails opened for recreational use. The roads and trails don't need to be maintained, they just need to be properly marked. (Individual No Address - #5673.91710)

6.7.4 Non-motorized Activities

Many respondents feel mechanized recreation should be restricted or banned in national forests. These individuals believe that mechanized uses such as cycling harm the environment. "I've seen the vegetation and trails damaged before my eyes," notes one individual. One citizen, particularly concerned with old growth, advocates the prohibition of all mechanized use in old growth forests. On the other side, advocates for mechanized use claim that mechanized "activities such as mountain biking are quiet" and should be permitted, along with hiking and horseback riding. Still others suggest that a compromise is needed between these two sides. "Perhaps some areas should be off-limits to mountain bikes, but most trails should remain open to them," notes one individual.

Some voice the opinion that the Forest Service should consider protecting national forest lands from all but human powered recreation activity, without specifying any particular modes of travel. Others claim that roadless areas should be restricted to foot traffic only. These members note that many citizens "need exercise" and that "by providing easy access to our forest they might consider walking to view the scenery."

Some members of the public believe that equestrian use should be restricted in roadless areas. They point out that "continuous use by pack-trains of horses is no better than use by trail bikes" at reducing environmental damage to trails. "Horse trails should be found only in areas which have the ability to sustain this type of heavy traffic," proclaims one proponent.

On the other hand, numerous individuals insist equestrian use should be allowed in roadless areas. These respondents feel that equestrian access has steadily declined and worry that the proposed rule will further reduce access. Many affirm that equestrians are responsible citizens who "help develop trails," " do not seek to damage the forest floor by exploring off of marked trails," and "pack out what they pack in."

One supporter of equestrian use maintains the Forest Service should provide adequate parking space for horse trailers at trailheads. This person believes that inventoried roadless areas once logged and now too steep for modern day logging equipments provide some of the "most scenic views" if accessible to horse trailers. A few dog sledding enthusiasts request that their sport be specifically allowed in roadless areas. Some, however, feel that any human entry of any sort is detrimental, and therefore roadless areas should be entirely restricted from human entry; or at least, significant restrictions should be placed on recreation in especially environmentally sensitive areas.

Public Concern: Mechanized recreation should be restricted or banned in national forests.

I've watched the cyclist going by on hiking trails and seen the vegetation and trails damaged before my eyes. (Individual, Longmont, CO - #2098.91620)

I believe that the absence of mechanical vehicles in the forests makes for a more rewarding experience for people who share the parts of the country that belong to us all. (Individual, No Address - #1287.91620)

Other mechanized use of old growth forest should be prohibited. (Individual, Cottage Grove, OR - #1909.91620)

Public Concern: The Forest Service should allow mechanized activities in roadless areas.

Trails should be open to mountain biking, (which is banned in Wilderness). Mountain biking is a quiet and relatively low impact form of recreation that should be a recreational activity that's promoted in our roadless areas in the National Forests, along with hiking and horseback riding. (Individual, Selah, WA - #5773.91700)

I believe much or most of the roadless areas should remain accessible to mountain bikes. We need to find a compromise--perhaps some areas should be off-limits to mountain bikes, but most trails should remain open to them. (Individual, Auburn, CA - #1960.91750)

Public Concern: The Forest Service should consider protecting national forest lands from all but human powered recreation activity.

This letter is to express my strong desire that the 2,500 miles of Forest Service trail and more than 2 million acres of unprotected roadless areas in National Forests in Washington State be protected from all but human powered recreational activity. I support the same protection for all National Forest lands. (Individual, Seattle, WA - #9708.10100)

Our citizens and the human population need to start making sacrifices to keep our earth healthy and, should we deserve, continue as a species. If you value wilderness so much for your solitude, recreation, exercise, you

should be willing to expend energy getting there and not destroy it in the process. (Individual, Crested Butte, CO - #7564.90240)

Public Concern: Roadless areas should be restricted to foot traffic only.

I am writing to ask you all to work for a plan to keep what is left of our national forests roadless. That means also no bike trails or ORVs or anything except feet. (Individual, Nevada City, CA - #1015.10100)

Existing trails should be reserved for foot traffic in sensitive areas and exclude other forms of access, if in fact, access of any type should be allowed. (Individual, No Address - #482.91600)

FOR PERSONAL HEALTH AND ENVIRONMENTAL BENEFITS

Let's leave nature alone for once and make people get out of their cars and walk! And we all know America has gotten fat so the walking will do us all good. (Individual, No Address - #1762.91610)

Besides, Americans need exercise and by not providing easy access to our forests they might consider walking to view the scenery. (Individual, Columbia, IL - #6227.90200)

Public Concern: Equestrian use should be restricted in roadless areas.

I agree with the concept of preserving the resource, but if access is to be restricted…do it equitably, allow only human foot traffic. Don't try to tell me that horse traffic doesn't help erode trails. Continuous use by pack-trains of horses is no better than use by trail bikes. I'm not suggesting that they be given access, I just don't think that there is any good argument for allowing access to horses. (Individual, No Address - #160.91630)

Horse trails should be found only in areas which have the ability to sustain this type of heavy traffic (and having horses for eighteen years I know the damage they can do especially on moist soil). (Individual, No Address - #482.91630)

Public Concern: Horses should be allowed in roadless areas.

Finally, after years of working toward it, I became a horse owner. Now finding places to ride has become a very frustrating experience. I am very concerned about continued equestrian access to the areas in question. (Individual, San Diego, CA - #97.91730)

We think the revised forest plans should recognize that stock users desire a full range of locally available backcountry recreational experiences. Local land managers must have the means and responsibility to use roadless, non-wilderness lands to maintain and enhance these experiences. (Business/Business Association, Lander, WY - #4567.91730)

I would like to suggest that the "Rule" include mention of equestrian/stock use as one of the recreational activities taking place within roadless areas. (Individual, Peoa, UT - #6279.91730)

…I feel that you have overlooked a user group in your listing of recreational activities that would have access to "roadless" forestland. The horse, used as saddle horse or packhorse was not listed among the "hiking, camping, picnicking, hunting and fishing" activities in your recreational uses. I hope that this is just a huge oversight and will be included in your final policy. (Recreational Organization, Knoxville, TN - #6914.91730)

I live in Riceville, TN and would like to see horse trails developed in the Cherokee National Forest which is very close to me. Since Tennessee is one of the leading states in horse ownership, it seems reasonable to me that we would have a voice in the development of these areas and the multiple-use concept should definitely

include horseback riders. Finally, I heard no one mention horse trails last night and that concerns me deeply. I can promise you that the horse people will support financially and physically to help develop trails if given the opportunity. I am a member of the Blue Ridge Trail Rider Club which has approximately 85 members whose membership includes small children up to the oldest member who is age 74. We will become more active and verbal in the future along with others who want to see future development INCLUDE, NOT EXCLUDE HORSES. (Individual, Riceville, TN - #6949.91730)

While I certainly can appreciate that damage can occur through irresponsible use of trails, I would offer the suggestion that the groups to which I belong (Arkansas Trail Riders Association and the Arkansas Chapter of the Missouri Foxtrotter) both encourage members to 'pack out what they pack in' and most of my friends dismount and retrieve trash left by others at every opportunity.
I assure you that we are responsible individuals, who supervise others closely, including minors, that accompany us on horseback rides. We also observe marked trails and do not seek to damage the forest floor by 'exploring' off of marked trails. We follow and communicate Forest Service guidelines regarding picket-lines for horses and other 'forest care' procedures. (Individual, Beebe, AR - #7561.91730)

After having recently learned of the intent to change policy for National Forest lands regarding a 'closed unless posted open status,' please allow me a few moments to express the concerns of responsible horsepeople who frequently utilize these trails. These trails provide a clean, family-oriented environment in which friends can share an outdoor experience. To reduce the availability of access to equestrian activities is counterproductive to fostering a healthy, drug-free environment that friends and family can enjoy together. (Individual, Beebe, AR - #7561.91730)

Public Concern: The Forest Service should provide adequate parking space for horse trailers at trailheads.

The land that has been inventoried as "roadless" in the Cherokee, Pisgah, Daniel Boone, and Nantahala National Forests has been logged at least once at one time or other. Most of the land is generally too steep to harvest timber with modern mechanical equipment efficiently. Even logging the old-fashioned way with draft horses and mules would be costly. Some may even consider the land "trash" land--only good for recreational purposes. This land creates some scenic views for trail riders. However, we still need to have vehicular access to areas where we can park our horse trailers. (Recreational Organization, Knoxville, TN - #6914.71300)

If the roadless initiative makes it impossible to trailer a horse to a remote trailhead, I cannot be in favor of it. (Individual, No Address #6996.10212)

Public Concern: The Forest Service should permit sled dog training, sledding, and racing in roadless areas.

I am against this Roadless Initiative because I am a sled dog owner and I am concerned that vague language within these wilderness proposals may end up limiting or eliminating my access to the National Forests and Parks for the purpose of training, sledding and racing with sled dogs. Dogsledding has historical significance as both a sport and also as transportation, prior to motorized vehicles in this country and around the world, and we feel that to preserve this sport, we need access to our forests and parks.
This past October, my husband and I moved to New Hampshire specifically because of the extensive trail access through the rail trail system, conservation land, logging roads, snowmobile trails and other private/corporately owned land such as that owned by the International Paper Company. (Individual, Sandown, NH - #13623.91750)

Public Concern: The Forest Service should considering restricting all human entry to roadless areas.

But I feel if it has to pass, it should eliminate ALL people and travel, which includes hikers, and horse-back riding. They can do just as much damage to terrain and disturb wildlife as anything else if not more, and what good would it be doing for the grizzlies if "some" forms of activity are still allowed? (Individual, Belgrade, MT - #7523.91600)

I realize that use of these lands will have a detrimental effect on them. I would suggest that, rather than excluding certain categories of access to the lands, you limit environmental impacts by routine closure of the lands to ALL. (Individual, Ann Arbor, MI - #9696.64150)

Public Concern: The Forest Service should protect ecologically sensitive areas from all damaging recreational activities.

Protect ecologic and sensitive nature areas (there are several of these in the Shawnee National Forest in southern Illinois) from horse trails, ORVs, and snowmobiles. These rare and special nature preserve areas should not be open to activities that cause excessive trail damage. (Individual, Naperville, IL - #204.64422)

Yes! ROADLESS & no excess horse & ATV trails. They are tearing up our natural areas in the Shawnee. (Individual, Columbia, IL - #6227.91600)

6.7.5 Recreation Capacity, User Conflicts, and Relative Effects of Activities

Clearly, many recreational users of public lands are concerned with the effects of the proposed rule on various recreational activities and modes of travel. The Final EIS should reanalyze the conclusion that the rule will have a detrimental effect on recreation, some feel. "The 'detrimental' impact on recreation of protecting roadless areas is at best speculative; it cannot accurately be described as 'likely,'" asserts one organization. Another individual asserts the analysis on the Tongass is "full of holes," and dispersed recreation "can't possibly make use of all the acres" available. Many individual users, especially non-motorized, echo this sentiment, feeling that the rule will have little impact on their activities.

Motorized recreationists strongly dispute this contention, however (see section 6.7.3). One individual requests that the Forest Service support its claim that roadless designations will benefit recreation. In addition, quite a few individuals and public officials question the adequacy of the effects analysis for recreation. They request that the Forest Service undertake more studies and that the Final EIS present more specific data. Suggestions from the public include: a formal study to determine who is actually using the national forests; a graph illustrating the increasing demand for dispersed recreation against the decreasing supply of available land for recreation; presentation of the percentage of usage for each class in the Recreation Opportunity Spectrum; and disclosure of dispersed recreation data. One group suggests that the Interdisciplinary Team consider addressing the effects of the proposed rule on particular subcategories of the Recreation Opportunity Spectrum. Another suggests that recreational use of public lands should be considered separately from commercial uses.

Numerous citizens are concerned that the Forest Service has not fully taken into consideration demographic trends in the United States. They feel the agency should consider the population growth trends and implications for recreation demand levels. A great many users fear that the proposed rule will result in a large recreation land base for a very small segment of the population. Many users, especially motorized recreationists, fear that their recreational opportunities will be severely curtailed.

On the contrary, many non-motorized users of National Forest System lands insist that it is their opportunity for quiet recreation that is being severely limited by the uncontrolled proliferation of motorized toys across most public lands. According to these users, the Forest Service should rightly protect roadless areas for the benefit of dispersed non-motorized backcountry recreationists both because there is ample opportunity for motorized use elsewhere, and because it detracts from the backcountry experience sought by many. "The national forests and other federal public lands offer the best opportunities for dispersed recreation because they have the land base. However, dispersed backcountry recreation is one of the most endangered opportunities offered by the Forest Service, because of roading and the creeping intrusion of incompatible uses," asserts one individual. Others note that motor vehicles dominate the rest of the country, and request that the Forest Service protect the last significant land areas that still offer a chance to escape them.

Quite the opposite, insist motorized users. "All visitors, not just those who travel by foot or horse, deserve a high-quality primitive, backcountry experience! Are not motorized and mechanized users entitled to solitude, as well? Perhaps roads in some of the existing Wilderness Study Areas should be re-opened to reduce motorized concentration and to enhance the quality of the majority of visitors' own wilderness experiences," says one motorized recreation enthusiast. The Forest Service should address the issue of crowding of motorized users in National Forest System lands, these users feel. Still others think this is an impossible task for the agency, because motorized access is inherently incompatible with the very qualities users want to experience.

Given the apparent increase in conflicts between different user groups, individuals of all persuasions request that the Forest Service develop solutions to address this vexing problem. Some feel that the Forest Service should facilitate and encourage the use of less utilized roadless resources to spread users out over greater areas. Others fear that displaced usage and reduction of available areas open to motorized use will cause damage to those roadless areas that remain open to certain uses, or to other forest system lands onto which use will be displaced.

Other recreational users question just how much environmental damage their activities cause, and often they compare the relative effects of various uses of forest resources to support their contention that their activities are relatively benign. For instance, some feel that foot traffic is more disturbing to wildlife than motorized traffic, while others believe motorized traffic causes greater stress to animals. Still others submit that natural phenomena cause more environmental damage than human recreational or commercial activities, so restricting human activities will not solve national environmental problems. Some individuals and recreational organizations, overwhelmed by a recent deluge of federal agency planning

efforts, request that the Final EIS include an analysis of the cumulative effects of these numerous concurrent national and regional planning processes on recreation, motorized recreation in particular. The Forest Service should develop additional alternatives to ensure recreation management is carried out in a manner consistent with all of these policies, one individual submits.

Public Concern: The final EIS should re-analyze the conclusion that the rule will have a detrimental effect on recreation.

The Roadless DEIS fails to identify any "major (recreation) developments that would require short segments of roads," or to note whether those short road segments would need to traverse roadless areas. (The ban on new roads in roadless areas is not a ban on new roads altogether in developed portions for a National Forest.) Finally, there is no discussion of how, if roadless area protections did contain recreational development on National Forest land, the recreational demand might be met by development on the extensive non-federal land in Southeast Alaska. The "detrimental" impact on recreation of protecting roadless areas is at best speculative; it cannot accurately be described as "likely." (Environmental/Preservation Organization, Washington, DC - #52235.91000)

ALTERNATIVE T1

As far as the Tongass is concerned, the analysis done in the EIS dealing with whether the Tongass should be excluded or not is full of holes. In the employment section, they say the T1 would have a decline in dispersed recreation. There is so much unroaded area now that the dispersed recreation that takes place can't possibly make use of all the acres. (Individual, Ketchikan, AK - #23864.93100)

Public Concern: The Forest Service should provide data to support the claim that roadless designations will benefit recreation.

There is a disturbing and pervasive bias in the agency's analysis in favor of the preferred alternative. Claims of recreational benefit are made for the massive roadless designation proposed but no data appear on the current recreational use of wilderness and current roadless areas--especially compared with roaded portions of the National Forests. Further a number of studies exist which show that most recreation, including dispersed recreation, takes place in proximity to roads. Yet, such data are curiously absent from the draft EIS. (Individual, Washington, DC - #18172.91700)

Public Concern: The Forest Service should undertake a formal study to determine who is actually using the national forests.

Before a new policy is thrown together and approved, a formal study should be done on who is actually using our national forests. A policy should be based on benefiting the taxpayers that are actually visiting the national forests! (Individual, Pinon Hills, CA - #1489.90010)

Public Concern: The Forest Service should display a graph illustrating the increasing demand for dispersed recreation against the decreasing supply of available land for recreation.

Page 3-122, Alternative 1, second paragraph--This paragraph states that the demand for dispersed recreation is increasing in an environment that is decreasing. This is a supply and demand question. The supply

(environment) is decreasing by only one half of one percent per year. On Page 3-117 it states that "A small segment (approximately 3 million acres) of the inventoried roadless areas have become developed with classified roads, recreation sites, and other constructed features causing a shift to the more developed end of the spectrum." The reason can be attributed to the statement made on Page 3-9 that says "The demand for high quality recreation experiences on public lands will continue to rise across a broad range of activities. These activities include motorized use such as off-highway vehicles and snowmobiles, and non-motorized uses...." In addition, on Page S-37, it states that the "Demand for dispersed, developed, and road dependent recreation is increasing." We know that the supply is declining slowly. At what rate is the demand increasing? These two factors need to be displayed in a graphical illustration to determine the trends of each.
Relief: The Forest Service must clarify this section in order to provide factual information and eliminate inconsistencies. Also, what is the impact of supply and demand on local communities who depend on a diversity of recreation activities? (County Elected Officials, Worland, WY - #16185.91000)

Public Concern: The final rule should quantify the usage for each class in the Recreation Opportunity Spectrum.

The Recreation Opportunity Spectrum's settings, activities, and opportunities represent a continuum that is divided into six classes: primitive, semi-primitive non-motorized, roaded natural, rural, and urban. Lets see the percent of use in each category for each American Group. (Environmental/Preservation Organization, No Address - #43585.91000)

While you define "Recreation Opportunity Spectrum," you fail to quantify recreation uses. It is my experience that by far the greatest numbers of recreation visits revolve around access by vehicle and take place within 1/4 mile of a road. (Individual, East Boothbay, ME - #8887.91000)

Public Concern: The Forest Service should disclose dispersed recreation data.

Page 3-120, third paragraph--This paragraph makes a statement that "Recreation use data has never been collected specifically for inventoried roadless and other unroaded areas." The Forest Service has been collecting dispersed recreation data for decades--where are the references to the Recreation Information Management (RIM) report prepared annually? The conclusion can be drawn that without the ability to assess environmental consequences based on use, then this decision must be delegated to local agency officials and local governments who have the information.
Relief: The Forest Service must either find and disclose this information or delegate the decision to local officials who have the information. (County Elected Officials, Worland, WY - #16185.90010)

Public Concern: The Interdisciplinary Team should consider addressing the effects of the proposed rule on subcategories of the Recreation Opportunity Spectrum.

There are additional categories and subcategories under the ROS classification that may be appropriate for consideration during the review of roadless and unroaded areas. (Environmental/Preservation Organization, Asheville, NC - #43412.91200)

Public Concern: Recreational use of public lands should be considered separately from commercial uses in the proposed rule.

Recreational use of public lands, especially in areas dominated by such use, needs to be addressed separately from commercial uses. (Individual, Steamboat Springs, CO - #8704.91600)

Public Concern: The Forest Service should consider the population growth trends and implications for recreation demand levels.

WA. state population predictions are for doubling in the next 50 years. Hopefully government land use planners will give population predictions very serious consideration for needs not just for fifty years but for many years ahead. (Individual, Cashmere, WA - #13478.71220)

There are six billion people on the planet and our own country's population is expanding at an alarming rate. Open space is a rare thing in this day and age and even more rare is the kind of undeveloped land that can support wildlife. People need these areas as well in order to escape from the increasing pressure of urban existence. I want these lands to be given real protection, not just lip service. (Individual, Cody, WY - #7591.71220)

In the "Overview of proposals," the agency asserts: "The outlook is for recreational road use to grow by an additional 64% by the year 2045." What study was used to come up with that data? What gives the agency the idea that the increase in use over the same length of time won't be similar? (Wise Use or Land Rights Organization, Salt Lake City, UT - #16190.90010)

Public Concern: The Forest Service should address whether the proposed rule will result in a large recreation land base for a very small segment of the population.

Comment: General--Overall, the entire recreation section needs to be shored up by providing information and data on how many people used roaded areas, unroaded areas, and wilderness areas. Only then can the balance of supply and demand be determined. The assumption on Page 3-125, last paragraph, is that the balance of roaded and unroaded should be 49% and 51% respectively. This is very speculative and a conclusion that has no basis other than it supports the "Proposed Action." The question that must be answered is, "will this proportion create a large recreation land base for a very small segment of the population?" And should Beaverhead County have to provide a disproportionate amount of this land base? (County Elected Officials, Dillon, MT - #17297.91200)

The Forest Service should address the claimed potential benefits of the proposed rule by answering the following questions: Does the general public actually want more dispersed recreation versus developed recreation? (Individual, Kingsport, TN - #8500.91000)

With the increased pressure that the Forest Service is receiving from visitors it is obvious the Proposed Roadless Conservation Rule is anti-recreation. The majority of forest visitors (about 98%) depend on forest system roads for their recreation. Only 2% of visitors frequent the 37% Wilderness Areas! (Recreational Organization, No Address - #9089.91000)

Public Concern: The Forest Service should protect roadless areas for the benefit of dispersed non-motorized backcountry recreationists.

Roadless areas provide a much-needed intermediate setting between classified wilderness and roaded lands. The national forests and other federal public lands offer the best opportunities for dispersed recreation because they have the land base. However, dispersed backcountry recreation is one of the most endangered opportunities offered by the Forest Service, because of roading and the creeping intrusion of incompatible uses. (Individual, Jackson, WY - #6870.10100)

Ample acreage must be set aside for non-motorized recreation including backpacking, hiking, and bird watching. These should be considered as important multiple uses, for which we desperately need permanent protection of roadless areas. (Individual, Provo, UT - #8058.91610)

The Forest Service has many miles of roads throughout their lands, and it is getting harder and harder for backpackers and hikers to get away from motorized traffic and civilization. (Individual, Spokane, WA - #8347.71300)

So, for whom are you going to plan roadless area uses: the people with machines, or the people who walk? Isn't there already a plethora of roads--unmaintained and otherwise--and motorized trails near urban and rural population centers? (Individual, Albany, OR - #2532.91600)

I'm out backpacking and hiking/camping a lot in the Kaibab Forest of northern Arizona, and [in] many of areas of the Dixie National Forest and you can hear the ORV's from miles and miles away and unfortunately--where they go it seems to leave lots of evidence of their travels with them; beer and pop cans, misc. trash, targets for shooting practice. Not too mention just the constant roar of their motors running non-stop. (Individual, No Address - #1182.91500)

I am a recent Appalachian Trail thru-hiker and grew up within walking distance of the Hoosier National Forest; people who can haul 3 cases of beer on their ATV create disturbance for me, but also tend to overly impact their campsites, "burn" their cans, compact the soil, etc. Please help to prevent or slow the destruction of these lands. (Individual, Arcata, CA - #1236.91500)

Backpackers and Hikers are very caring of the environment, yet the areas that can be explored and enjoyed by "people without machines" is shrinking. (Individual, No Address - #1317.91500)

For much of its length, the Appalachian Trail is managed to provide a removed backcountry hiking experience. The presence of roads can compromise that experience in several ways. The visual impact of roads on the landscape is a major concern of ATC, as is the audible impact of vehicles using roads that are in close proximity to the Trail. An even greater concern is the access provided by nearby roads. This had led to illegal use of the trail by off-road vehicles, or resulting in heavy use and resource degradation at Trail shelters and other destinations (such as ponds). Enforcement is difficult, and the problem is exacerbated where roads cross or are in the vicinity of the Trail. Finally, roads can fragment wildlife habitat, serve as corridors for invasion of natural habitats by exotic species, and degrade water quality. These impacts can diminish the hiking experience that ATC and its management partners seek to provide. (Recreational Organization, Harper's Ferry, WV - #53414.71300)

Public Concern: The Forest Service should address the issue of crowding of motorized users on National Forest System lands.

All visitors, not just those who travel by foot or horse, deserve a high-quality primitive, backcountry experience! Are not motorized and mechanized users entitled to solitude, as well? Perhaps roads in some of the existing Wilderness Study Areas should be re-opened to reduce motorized concentration and to enhance the quality of the majority of visitors' own wilderness experiences. (Individual, Edgewood, NM - #50250.91710)

An increased number of users have resulted in a decline in the 'outdoor' experience. Of course the population in the U.S. has increased throughout this time but no new National Forests have been added since that time. (Individual, Kenyon, MN - #1057.91500)

I would like to see more riding trails opened. If the bill passes, it would put a large number of riders in a very small area. This would have devastating effects on the environment. If there are no reconstruction efforts, the existing trails will deteriorate [to] the point that they are unusable. (Individual, London, KY - #152.91500)

The practice of closing an area this large (almost the entire state of Wyoming) is a bad idea because it will only concentrate these users in the remaining areas thus causing problems there. We are seeing this problem on our lakes where personal watercraft users are concentrated in one area, causing more accidents. (Individual, No Address - #1539.91500)

The mileage already devoted to off-highway vehicles is certainly adequate. If these roads are considered inadequate, the people who use them must recognize that the problem is the fact there are too many people in this country. To stabilize and reverse this number is what will cure overuse of our common land. (Individual, Forest, VA - #1716.91500)

Public Concern: The Forest Service should address the fact that motorized access is inherently incompatible with the very qualities users want to experience.

Everyone wants access to wilderness even though that access, at some point, renders wilderness exactly the opposite of what we want. Most of the clamor for additional road construction and other development comes from folks who want to enter wilderness on motorized conveyances which, simply stated, are not compatible with the concept of wilderness. (Individual, Freeport, IL - #5245.90240)

Public Concern: The Forest Service should address the increasing conflicts between types of recreational users.

Recently in the past couple of years I have been assaulted and provoked by cross country skiers! On several outings I have had ski poles swung or thrown as I slowed down to pass a skier, after these events I always stop and ask why? And maybe try to show them that not all snowmobilers are reckless. But they seem to always argue that I am riding in a closed area and should evacuate! Even after pulling out a trail map that details the closures they will not look at it. The skiers constantly park to block marked snow-mo crossings. (Individual, No Address - #7064.91500)

As someone who runs sled dogs in National Forests in the west, I am completely satisfied with the trails we have already. I just wish we could ban snowmobilers on some of them. (Individual, Coalville, UT - #5235.91500)

I was in Missouri State hiking before hunting season and a hunter on a 4 wheeler came up with his guns and really scared us. We were not sure he would react to us in a friendly manner. Happily he did, but it is still scary meeting up with someone with a gun on a 4 wheeler. (Individual, Ballwin, MO - #5365.91500)

My neighbor recently camped with his 2 young boys in the national forest. They were awake at night and disrupted in the day from off road vehicles racing around the forest. There was gun fire (including automatic) for more than an hour in the evening. I like to camp too, but not under those conditions !! (Individual, Boulder, CO - #5816.91500)

The original goal of a roadless area policy was to set aside a portion of forest lands to be used differently than current uses which include logging and motorized vehicles. I and my family have camped and participated in the Passport in Time programs of the Forest Service and enjoyed both. We have not enjoyed the times when it seemed we were in an ORV park. They have, in fact, been extremely distressing, causing us to move camp and divert our hikes to avoid the dirt and noise. By not excluding motorized vehicles there will be no place to go for the hikers and those who wish to speak in a normal tone of voice. Where can people go who do not have loud machines? There should be some place [for] those of us who want to enjoy the forest because it is a forest. We used to say that your freedom ended where mine began. Why should some citizens have the freedom to destroy my peace, anywhere, anytime? I believe we can share the forest only if some areas are set aside for non-motorized activities. My use of the forest is restricted by motorized vehicles. It seems fair that their use of the forest be restricted as well so that we can both enjoy the forests, just different parts of them. (Individual, Spokane, WA - #3527.91500)

I am a frequent user of National Forests as a backpacker, and would add that contrary to their spin, use by industry and especially by off-road enthusiasts is not, repeat NOT compatible with backpacking, rock climbing, birdwatching, or for the animals' and land formations' existence. (Individual, Arcata, CA - #1236.91500)

Low impact activities should be allowed, such as hiking, fishing, and hunting, but should be monitored for overall impact. ATVs should not be allowed. These are not compatible with any natural area that I know of. (Individual, Talking Rock, GA - #800.91600)

We don't need nor should we want more areas for 4-wheeling, snowmobiling and the rest of motorized sports. For years we have enjoyed going to Yellowstone to snowmobile and have respected the laws of the Park. I am all for not doing that any longer if it means preserving the beautiful parks … (Individual, Anaconda, MT - #859.91610)

Public Concern: The Forest Service should facilitate the use of less utilized roadless resources.

Many of our roadless/wilderness areas are so popular that the resources are being damaged from overuse. One way to alleviate this problem is to facilitate the use of less utilized roadless resources. An example here in Idaho is the Sawtooth National Recreation Area, where some roadless sections receive heavy summertime use. To the east of the SNRA there are extensive roadless NF lands in the Lost River and Lemhi Mountains. However these less visited areas cannot support increased recreation use due to the dominance of livestock grazing and the poor condition of access roads (to trailheads). (Individual, Boise, ID - #380.64150)

Alternatives 2-4 will result in significantly increased recreational use of smaller and smaller areas which will result in degradation of both the recreational experience and of the environment in the areas accessed. This is briefly discussed in the DEIS but treated as of no consequence. There will be serious negative impacts which need to be recognized and mitigated. (Individual, Markleeville, CA - #13284.91500)

Public Concern: The Forest Service should develop a plan to accommodate displaced off-highway vehicle users.

The OHV recreation in both roadless and unroaded areas will be subjected to so many conditions that few opportunities will remain. There is no plan to accommodate the displaced users. (Individual, Thibodaux, LA - #13337.10212)

Public Concern: The Draft EIS should include an evaluation of the impact of displaced usage on all National Forest System lands.

I urgently stress that the impact to ALL land values and ALL forest lands, including recreational and economic values as well as environmental values, be considered in the DEIS, not just the preservation of a few areas. To not consider increased (displaced) usage in the remaining forest lands would be environmentally irresponsible. (Individual, Littleton, CO - #134.63000)

Require that the impact on the entire forest--and even adjacent forests--caused by displaced recreational usage be a mandatory consideration in designating roadless areas and management strategies. As OHV lands are closed, the displacement of users causes increased severity of impact on the remaining areas and this must be included in any EIS for closure. Land managers should not be allowed to circumvent this evaluation. (Individual, Littleton, CO - #1219.61300)

…by closing more of the back country roads and making everyone stay in just a few areas, more damage will be done to the environment by having everyone concentrated in just a few areas. This will have more of an impact than letting everyone spread out. (Individual, Las Cruces, NM - #2775.80000)

Public Concern: Natural phenomena cause more environmental damage than human recreational or commercial activities, so restricting human activities will not solve these environmental problems.

The eruption of Mt. St. Helens wiped out more trees than the logging industry has or ever will. (Individual, Ahwahnee, CA - #4012.83000)

The very nature of these natural areas is that natural phenomena have a higher probability of eliminating these so called benefits than any motorized or other road using recreation would. Millions of acres of federal land are impacted every year through completely natural phenomena (lightning strike fires, mudslides, floods, etc.) (Individual, No Address - #2808.81000)

Public Concern: The Forest Service should address whether wildlife are more threatened by foot traffic or by motor vehicles.

FOOT TRAFFIC

It has been our experience that wildlife such as deer, elk and moose, feel MORE threatened by people on foot than by someone driving by in a vehicle. (Individual, Clancy, MT - #11329.83500)

MOTORIZED VEHICLES/OFF-HIGHWAY VEHICLES

Have you ever been sitting in a mature wooded area, hoping your entry while it was still night, would allow you to see wildlife undisturbed and not detect your presence? THEN, less than an hour after sunrise, an OFF THE ROAD VEHICLE blasts down a trail making enough noise to be heard for miles, let alone just several hundred yards from where you are sitting?! All of your plans and efforts are lost. This has HAPPENED TO ME. It is frustrating, very frustrating. (Individual, Mt. Auburn, IL - #2189.91500)

Thirty years ago four-wheel drive vehicles (4x4's) were uncommon, snowmobiles and all terrain vehicles (ATVs) were rare to non-existent, and fewer miles of forest roads existed. Today, many more people use the National Forests for recreational purposes, 4x4s are abundant, snowmobiles and ATVs are common, and a dense network of Forest roads exists. Studies demonstrate the effects of increased motorized off road traffic on wildlife. For example, Dorrance et al (1975) found that home range size and daily movement of white tailed deer increased with increasing snowmobile activity in Minnesota. Yarmoloy (1988) found that mule deer experimentally harassed by ATVs produced fewer offspring the following year. Also, excessive motorized vehicle activity encouraged by extensive road systems degrades the quality of experience for many public lands user such as hunters, fishermen and non-consumptive wildlife users. (State Agency, Santa Fe, NM - # 17300.91000)

Public Concern: The Final EIS should include an analysis of the cumulative effects of numerous concurrent national and regional planning processes on recreation.

I would like to see the study of the cumulative impacts of recreation for all of the following: Sierra Nevada Framework, Roadless Initiative, The new Forest Service Roads Policy, The Forest Service Policy and Standards revision, The Wilderness Study revision for the Ansel Adams, John Muir, Dinkey Lakes and Monarch Wildernesses, the 2 National Park Plan Revisions, the BLM OHV Plan. All of these things are going on at one

time and their cumulative impacts have not been addressed. This is unacceptable. (Individual, Mammoth Lake, CA - #25660.72200)

MOTORIZED

Much is made in the DEIS that the proposed action will enhance the opportunity for dispersed recreation. That is true only if people are able to get to these areas in the first place, and the concurrent USFS Proposed Road Management Rule certainly raises doubt about that. This rule is intended to remove "unneeded" roads from public forests and I have seen estimates placing this as high as 80% of all forest roads. Even if this is an exaggeration, the potential impact on access and recreation is staggering. Nowhere in the DEIS is this issue adequately considered. Both the National Park Service and Bureau of Land Management are taking concurrent aggressive action to limit motorized recreation. Has the USFS even considered what the impact from those actions will be on public forests? The absolutely unacceptable future I can see coming from these actions are: most of the forest roads are shut down, the individual forests shut down all the trails in unroaded areas, we end up with Administrative Wilderness areas everywhere and all the people recreate together like minivans in the Disneyland parking lot. This will be a disaster and I do not support it. (Individual, Fort Collins, CO - #19429.72200)

With adoption of the PLANNING RULE and ROAD MANAGEMENT STRATEGY, the ROADLESS AREA CONSERVATION efforts take on a whole new dimension. The primary problem is not with the identification of the existing INVENTORIED ROADLESS AREAS because they have been well documented. The main problem will come later with the establishment of the UNROADED AREAS. Once these UNROADED AREAS are identified, motorized recreation feels the ability of the local managers to actively manage the areas will be constrained by the built-in mandate for ECOLOGICAL SUPERIORITY in the planning rule. The end result will be the ultimate abandonment of our national forests to the forces of nature. Taking into consideration the combined effects of the three aforementioned rulemaking processes, it is quite obvious that the ability of access and use of our national forests by the public for recreational pursuit will be sharply reduced. Additionally, our vehicles will be shifted to the more developed, or urbanized range and away from undeveloped, primitive and backcountry types of experiences. Needless to say, this will have, ultimately, a profound effect on the public. One of the more significant recreational values inherent in our national forests in the ability to easily traverse and discover the relative untouched and primitive back country environment with our motorized vehicles. (Recreational Organization, Cleves, OH - #18486.72100)

Public Concern: The Forest Service should develop additional alternatives to ensure recreation management is carried out within the scope of the proposed rule and Roads Management Strategy.

Recreation is cited as the "Single Largest Use of NFS Lands" and a significant and continuing increase in that demand is forecast. The National Forest System Road Management Strategy, Environmental Assessment and Civil Right Impact Analysis, Dated February 9, 2000 is defined as a companion to this DEIS and calls for aggressive road decommissioning activities. I am unable to understand from these documents how the agency plans to address the rapidly increasing recreational demand for Forest access through the adoption of the preferred Alternatives of this DEIS with the contradictory approaches of these documents. For a document of this magnitude and potential impact, additional alternatives should have been fully developed and evaluated that ensure the Forest management is done in a consistent manner within the scope of this proposed rule and the NFS Road Management Strategy. (Individual, Sunnyvale, CA - #50735.72220)

6.7.6 Public Education, Monitoring, and Enforcement

Numerous respondents express concern over monitoring and enforcement of any recreational restrictions in roadless areas. Some users assert that any restrictions imposed upon their activity will simply be ignored in protest and note that enforcement is unlikely. However,

many other users do agree that better user education, monitoring and enforcement are key to reducing recreational impacts and conflicts. Many feel that rather than completely close areas or restrict certain types of use, the Forest Service should educate people about protecting the land. Another alternative to closure is to issue permits and hold each individual accountable for damage, one individual insists. Some suggest that the Forest Service should consider OHV permits that include 'Tread Lightly' or similar training information as a mandatory prerequisite for traveling, perhaps accompanied by a renewable license similar to street legal vehicles. The Forest Service should print trail guides for off-road vehicle users to direct them toward appropriate riding areas, some feel. Others suggest posting more informational signs at trailheads to make the public aware of when they are in ecologically sensitive areas. Others request that naturalist interpreters be placed in the campgrounds of the National Forest System.

Many others do not feel that education alone is sufficient to minimize environmental damage caused by motorized recreationists. They call for the Forest Service to enforce OHV use restrictions. In fact, a significant number of motorized users support greater enforcement, so that irresponsible users are punished directly rather than all users being further restricted. Many believe that fines should be imposed on OHV riders who go off designated trails. Others are concerned with out-of-bounds and illegal snowmobile use, especially designated wilderness trespass, and they call for stringent enforcement to discourage this behavior. Others however, note the conspicuous lack of enforcement personnel in the field due to budgetary restrictions, and therefore request that the Forest Service only allow motorized recreation in limited areas where the agency has sufficient resources to actively enforce regulations. Others suggest that the Forest Service should adjust personnel work schedules to assure weekend patrols for motorized travel enforcement. Many recommend the licensing of OHVs to aid in the enforcement of users' illegal actions. Another individual opposes licensing and increased fees which attempt to recovery agency costs, feeling that this unjustly restricts motorized access.

Finally, many respondents are concerned with the ability of the Forest Service to enforce any prohibitions included in the final rule, not just any that might apply to recreationists. The final rule should include explicit monitoring and enforcement plans for all prohibitions, they maintain. Some fear that local Forest Service personnel will be unwilling to implement roadless protection and assert that many Forest Service employees do not support this proposed rule. Other request that the final rule be consistently enforced on all individual forests so that all users and are treated fairly.

Public Concern: Rather than close areas or restrict use, the Forest Service should educate people about protecting the land.

We love driving through the forests and feel that education, not closure, is the key to preservation. (Individual, Salt Lake City, UT - #6752.91100)

Maybe if we would spend more time enforcing these areas along with educating people about the terrain & how to preserve it we could keep these areas open. (Individual, No Address - #7689.90000)

A national education program should be established for youth in grade and high schools, to better acquaint the students with what is out there to observe and study from the biodiversity to the recreation. (Individual, Roseburg, OR - #751.91100)

I know there needs to be control with the ATV traffic and I agree. The public needs to be educated on the damage done by these vehicles and the 4-wheel drives that break through snow drifts and open roads before they are ready. Very few people in our part of the woods rush into the woods tearing up terrain, we wait until the forest service tells us that the roads are open and we can get into Eagle Creek again. A few cannot be allowed to ruin America for the majority. (Individual, Union, OR - #11293.91100)

Keep the education process of the public and industry going. I applaud and support your efforts. (Individual, Spokane, WA - #7053.44010)

Public Concern: The Forest Service should educate the public about the differences between national parks and national forests.

Leave the forests open to "promote the most things to the most people" like the Forest Service is supposed to do. Do not lock land up, do not limit activities. The forest was set aside to use. It is not a National Park, and unfortunately the general public doesn't know the difference [between] a National Park and a National Forest. Make it the Forest Service's policy to educate the public what the differences are. (Individual, Vonore, TN - #5713.10200)

Public Concern: In the event that everything is closed, the Forest Service should issue permits to individual users, then hold those individuals accountable for any trash left behind or environmental damage done.

I think that this is the wrong approach as it is presented to me! Why punish all for what some jerk has done! If everything is to be closed off, then issue permits, for example 1 week, 1 month or for a year to a person, getting his car/truck plate info. And make him accountable for any destruction, trash or environmental damage that has been done. If a permit was issued, then nobody else could be there. You could control how many vehicles could be in the forest at any particular time. Thusly controlling the eco. Think about this. (Individual, No Address - #10372.10210)

Public Concern: The Forest Service should consider off-highway vehicle permits that include a tread lightly or similar training course as a mandatory prerequisite for traveling.

…My family and I have traveled all over the western U.S. adhering to the tread lightly code of conduct. I would not be opposed to OHV permits that include a tread lightly or similar training course as a mandatory prerequisite. (Individual, No Address - #1756.91712)

I feel we would have a more lasting impact by educating people on land-use and land preservation than just trying to close public land. What about a 'permit to use' plan where a limited amount of permits would be given out each year to use an ORV in a certain area during a certain time. The cost of these permits could be used towards land preservation, trail maintenance and education. When a person is awarded a permit, the are also given a 'Land Use Guidebook' to help educate them about the fragile land they are being given the right to enjoy. (Individual, Aurora, CO - #564.91100)

We all need to be educated how to treat our woods. Why not have classes for all citizens. Then give a card stating our education. Like a drivers license. Renewed every 5 years if we haven't had our license revoked.

$10 a piece or $15 per family. [The] money to go to keep roads up in the wooded areas. If there is a surplus of money paying for the program. (Individual, Tensed, ID - #7589.91100)

Public Concern: The Forest Service should print trail guides for off-road vehicle users.

Trails are being developed now in less sensitive areas for ORV use. Efforts should be made to make these systems attractive to these potential users. This could be done by printing trail guides with points of interest and available facilities. (Individual, Medford, OR - #17514.64150)

Public Concern: The Forest Service should place interpreters in the campgrounds of the National Forest System.

Put Forest Service interpreters in the campgrounds of the National Forest System AS WAS RECOMMENDED TO THE CHIEF BY THE NATIONAL RECREATIONAL STRATEGY COMMISSION at Lake Geneva in 1987! (Individual, Durango, CO - #745.41200)

Public Concern: The Forest Service should post wildlife signs to make the public aware of when they are in ecologically sensitive areas.

[Post] notices on sign boards to make people aware of time of baby animals, nesting birds, certain food sources growing. This may make public more aware of what's not to be destroyed or bothered. (Individual, Moscow, ID - 7949.83500)

Public Concern: The Forest Service should enforce off-highway vehicle use restrictions in roadless areas.

Enforce the regulations against motorized vehicles in roadless areas; these ATV people are outrageous in their behaviors of ignoring restrictions and taking liberties with our national heritage. (Individual, Boulder, CO - #6367.91610)

An aggressive program to monitor and police our public lands must also be immediately developed and fully funded to combat and prevent illegal off-road travel and to put a complete stop to illegal "user created roads and trails." Violators' vehicles need to be confiscated and auctioned, with the proceeds going to fund the policing program. Your agency needs to offer a substantive alternative embodying such a policy. (Environmental/Conservation Organization, Albuquerque, NM - #52118.60000)

There is so much the agency can do now to stop the abuse of ORVs and motorized intrusions on the High Uintas, that incredible expanse of forest that I am primarily speaking to defend today. Start with increased monitoring and signing and issuing of violations that judges can make "stick," wider circulation of travel plans that can be easily read by a sixth grader so there is no mistaking where a driver and his machine are disallowed (six grade is the average level toward which average television programming is directed, I understand), and more closures to deter these blasting beasts of the backcountry. (Individual, Hyrum, UT - #15067.91200)

Public Concern: The Forest Service should provide better monitoring and enforcement to responsibly accommodate all users.

Our forests and lands can be managed for multiple use and in a responsible manner, which protects the forests and lands, and provides access for recreational and commercial activities. Better monitoring and enforcement of multiple use rules will accommodate all users in a responsible manner without excluding anyone. (Individual, Colorado Springs, CO - #2415.21000)

I would like much rather to see a strategy of enforcing existing trail use rules and development of more trails for all users. (Individual, Colorado Springs, CO - #2415.61300)

Public Concern: Fines should be imposed on off-highway vehicle riders who go off designated trails.

OHVs should only go on designated trails and not stray off the trails. If the OHVs go off the designated trails there should be fines implemented to help repair the damage done. (Individual, No Address - #2970.91100)

Along heavy-use routes: institute patrols to enforce “no off-road” and “no new road” rules. Hefty fines for violators and fees would help pay for road maintenance, turn-out maintenance and the patrols. (Individual, No Address - #2318.60000)

Public Concern: The Forest Service should enforce out-of-bounds and illegal snowmobile use.

Snowmobile use is grossly undercharged. It costs more to camp for one night than to use a snowmobile for a year. Even so, most snowmobiles are unregistered. Further, enforcement of out-of-bounds and illegal riding is largely unenforced, and the cost of enforcement far outstrips the revenue from use. (Individual, Markleeville, CA - #236.91613)

Public Concern: The Forest Service should only allow motorized recreation in limited areas where the agency has sufficient resources to actively enforce regulations.

I visit the Caribou area several times a month. I have never seen any Forest Service personnel in the area. I have read newspaper accounts in which the Forest Service claimed they were unable to address management issues in other areas due to resource or funding limitations.
Until the USFS can provide adequate oversight of motorized recreation I believe that you should protect the forest by limiting the places where it can be done to those you can provide adequate oversight for. (Individual, Nederland, CO - #6754.93610)

Public Concern: The Forest Service should adjust personnel work schedules to assure weekend patrols for motorized travel enforcement.

Does the Forest Service spend any weekends or evenings patrolling, controlling traffic? I doubt it. Why couldn’t personnel be rotated on weekends-evenings instead of only 8 to 5 on weekdays, with check-in and check out at the office by 5 or earlier? (Individual, Fairview, UT - #10808.93600)

Public Concern: The licensing of all-terrain vehicles should be encouraged to aid in the enforcement of users' illegal actions.

I believe A.T.V.'s should be licensed with tags so they can be reported, should they act illegally.
ATV's are out of control in areas of the forest I frequent Bridger Teton & Shoshone. (Individual, Lander, WY - #6122.91612)

Public Concern: The Forest Service should revise the proposed rules governing Cost Recovery for Processing Special Use Applications and Monitoring Compliance with Special Use Authorizations.

I. . . enjoy the use of Off-highway motorcycles (OHMs) and All-Terrain Vehicles (ATVs). . . . My access to public lands is being jeopardized by the proposed rules governing Cost Recovery for Processing Special Use Applications and Monitoring Compliance with Special Use authorizations. My primary concerns with the proposed rule are: the inability to appeal discretionary decisions made by one "authorizing officer" on each decision; and the absence of a "cap" or limit on the amount of processing and monitoring fees. (Individual, Canon City, CO - #1103.72100)

Public Concern: The final rule should include explicit monitoring and enforcement plans for all prohibitions.

There should be follow-up inspection to ensure that the rules are enforced if the proposal is approved. (Individual, Austin, TX - #757.93622)

There should be strong enforcement of existing roadless status. (Individual, Basin, MT - #3645.93622)

Another problem is the enforcement of these policies. I worked last summer in Oregon, and saw total abuses of stated policies and plans. For example, on Mt. Hood, there was a timber sale that would have cut--in a couple of months--the amount of acreage that the local management plan had specified to be cut over the period of a decade. Everyone fights so hard for sound management plans. Why bother if they are completely ignored? (Individual, New York, NY - #381.42000)

I would like to see the roadless rules funded and enforced. (Individual, Basin, MT - #7381.93622)

If you choose to enforce this plan, how do you plan to do so? (Individual, Carson City, NV - #790.71230)

I am concerned about construction of an ORV route constructed through a roadless area in the Abajo Mountains. It is my understanding that the route was illegally constructed, without due public review and in violation of environmental laws and National Forest policy. I urge you to look into this and enforce roadless area protections. (Individual, Brooklyn, NY - #8688.91612)

Public Concern: The Forest Service should address the unwillingness of local Forest Service staff to implement roadless protection.

I…want to call to your attention the antics of your staff in my neck of the woods. (See enclosures) I find it reprehensible that, rather than helping to educate the public to the necessity of conserving the living systems of the Sierra--which are the lifeblood of the whole state--the Tahoe National Forest staff continues to go on public record as cheerleaders for destructive practices. If they have eyes to see, they can't help but know that humans are using and misusing the mountains to death. A short hike in any direction from almost any point in TNF would tell them that…although there are so many roads that one doesn't need to walk anywhere to reach

anywhere else. Besides the wilderness areas, more and more parks and campgrounds are being taken over by deafening, polluting recreational machinery. It's crazy.
Please apply some remedy in the case of the TNF staff, which is part of the problem, not the solution to ongoing destruction of public lands and heritage resources. (Individual, Lincoln, CA - #1671.42000)

I have concerns about the management of the rule change on the Caribou National Forest. In interviews with the local press and at public meetings the District Rangers have stated that there is no local public support for roadless and they say managing areas of the forest for roadless will be difficult and create lots of problems. They sound very much like the area's county commissioners. If this is the local rangers' attitude towards roadless will they be willing to implement the roadless plan and manage it correctly? (Individual, Pocatello, ID - #2128.42000)

FOREST SERVICE EMPLOYEES DO NOT SUPPORT THIS PROPOSED RULE

I have talked to numerous FS employees who are not too happy about this proposal. Why is that? If it is from the FS then why are they not endorsing it? Is it because the only jobs will be park rangers who control the maddening number of ATVs who make it off road because they can? (Individual, No Address - #2999.41200)

Having served as a District Ranger and in a number of staff positions at the forest, regional and national headquarters, I have some rather firm opinions based upon my education and experience. Among my beliefs is the conviction that management and protections of public forests is not well served by politically inspired edicts such as the current proposal to ban roads in some millions of acres of national forest lands. (Individual, No Address - #541.41000)

Public Concern: The Forest Service should assure that the final rule will be consistently implemented and enforced.

My concern comes from the actual enforcement and interpretation of these rules once they are made. A large part of our "northern economy" comes from these lands including timber harvest, snowmobiling, ATV, and multiple other recreation uses. While the intent of the rule does not reportedly affect these systems, it does provide latitude of "decision making" for this initiative. As I have seen far too often, these "initiatives" take on very personal flavors and often do not even closely resemble the original rules nor their intent. (Individual, WI - #2757.42000)

6.8 Land Ownership

Many respondents express concerns about the effects of the proposed rule on private and non-federal land ownership. These concerns are covered in the following sections: 6.8.1 Urban/Forest Interface; 6.8.2 Inholdings; 6.8.3 Land Exchanges and Acquisitions; and 6.8.4 Transfer of Effects to Private and Other Public Lands.

6.8.1 Urban/Forest Interface

Some respondents write that the Forest Service should reevaluate statements concerning the loss of open space as a rationale for the proposed rule. One citizen requests the Forest Service display quantitatively the relationship between urban areas, populations, and roadless areas in the United States. Others state the Forest Service should address access to public land through private land.

On an unrelated note, one respondent suggests the Forest Service allow homesteading and long-term camping on areas thought appropriate by local communities.

Public Concern: The Forest Service should reevaluate statements concerning the loss of open space as a rationale for the proposed rule.

In the discussion on open space, reference is made to the importance of roadless areas. Open space is most commonly referenced in areas of community growth, e.g., parks, riparian zones, undeveloped areas, etc. The statement that open space is being lost on other ownerships is not necessarily true--many counties are requiring open space through zoning and community planning. In addition, the document does not address roadless and open space contributions of other land management agencies, such as the BLM, NPS, FWS, etc. And, it is important to include that the demand for commodity uses will also increase in roadless areas. (County Elected Official, Worland, WY - 16185.71220)

The "Plan" states that in the last five years, 16 million acres of open spaces have been lost to urban development. Number one on their list of lands lost to urban development is "cropland." Cropland is farmland owned by farmers. I fail to see what this has to do with roadless areas on public land. If cropland was removed from this equation, there would be nothing left. I don't believe that the government is handing public land over to developers for houses and malls. (Individual, Sumpter, OR - #2749.31300)

Why does your plan cite the loss of non-Forest Service land, (1.2 million acres a year lost to urban sprawl) as justification for taking land out of production in areas like northern Minnesota that rely on resource-based economies? … Fight urban sprawl where it is occurring and leave that as the separate issue it is. (Individual, Sovey, MI - #670.93700)

If you and the other do-gooder environmentalists in this country want to do some real good, try lobbying for common-sense development that would integrate more green space into the huge, ugly, overcrowded urban sprawl areas. At least then, you'd be addressing the real source of most environmental problems. (Individual, No Address - #216.41200)

Public Concern: The Forest Service should display quantitatively the relationship between urban areas, populations, and roadless areas in the United States.

Page 3-6, last paragraph-- The statement "many unroaded areas are located near urban areas" is not supported. The descriptor "many" is subjective and does not relate to Figure 3-3, Page 3-5. In fact, by interpreting the map one could infer few roadless areas are located near very many urban areas. Relief: The Forest Service must display quantitatively the relationship of urban areas, populations, and roadless areas in the United States. (County Elected Official, Worland, WY - 16185.71210)

Public Concern: The Forest Service should address access to public land through private land.

We need ACCESS TO PUBLIC LANDS THROUGH PRIVATE LAND. Private land is being bought up around national forests and closed off. We need to be allowed access through private land in eminent domain or all management of public lands will be a moot point. (Individual, West Point, UT - #4008.71120)

I would like to express my concern about the way private land owners are preventing me, a Federal taxpayer of Arizona, fisherman, hunter and hence co-owner of the Coronado National Forest as well as Arizona State lands, from having access to public lands by locking gates. These lands should be accessible to all who share their

ownership and pay for their management, not just the adjacent land owner and their friends. Many of these access points are the only way into forest lands. Locking access to these public lands essentially privatizes our National Forest and that is wrong.
There is legal precedence to keep roads open that have been used for years and are not suddenly closed and locked. The government agencies that manage these lands should exercise that legal prerogative to keep the gates unlocked. I understand the landowners concern about vandalism and trash left behind by a few and would even support a way to police the trash and compensate for the vandalism.
I encourage national and state agencies with public land management responsibility to do more to resolve this conflict. I would like to see a procedure put in place that would allow me to contact an office to register a specific complaint when access is denied. (Individual, Dragon, AZ - #7396.90300)

Public Concern: The Forest Service should allow homesteading and long-term camping on areas thought appropriate by local communities.

Why not allow homesteading and long-term camping on areas selected by locals as appropriate? We have the capacity to live well with battery, solar, fuel cells, RVs and campers. With a little bit of imagination on the part of the Forest Service, small plots of land could be farmed and lived on for a portion of the year. (Individual, Stinson Beach, CA - #5651.64410)

6.8.2 Inholdings

Many members of the public feel the Forest Service should consider the effects of the final rule on state trust land inholdings. An individual states “existing law provides the state with a right of reasonable road access to all of these trust lands.” One state elected official comments “for those sections of state land affected by the roadless proposal there is a concern that the potential to develop recreational opportunities will be lost.” Many agencies are concerned with effects of the proposed rule on access to state lands, and request that road access be guaranteed and that surrounding roadless areas be available for mineral leasing to be able to maximize the income to state trusts.

Other people are concerned with the effects of the proposed rule on inholder rights and private property and feel these effects should be addressed in the final rule. One county elected official reminds the Forest Service that the easement by necessity doctrine, whereby a grantor cannot landlock his grantee, also applies to the federal government. Some respondents feel the construction of private roads in close proximity to designated roadless areas should be allowed to prevent even greater environmental damage if roads must be routed to avoid roadless areas or if road access through roadless areas is closed. Some respondents believe the proposed rule will have positive impacts on the value of private property.

Public Concern: The Forest Service should consider the effects of the final rule on state trust land inholdings.

The DEIS totally fails to address the state’s scoping comments. Not one mention of endowment lands or school trust lands is found in the entire DEIS. (State Elected Official or Staff, Boise, ID - #21160.63000)

Idaho Public Schools are badly underfunded generally. WE MUST BE ABLE TO MAINTAIN HEALTHY FORESTS AND HAVE GOOD ACCESS TO ENDOWMENT LANDS IF EDUCATION IN IDAHO IS NOT TO be negatively impacted. Idaho ranks 45th lowest in the union in pay for teachers, has a horrendous backlog of building maintenance problems, and because we are a rural state, we rely heavily on bus fleets to get our kids to schools. We do not have the population nor the industrial tax base (especially in Northern Idaho!!) to pay for educational needs. Please don't enact rules which will in the long run create more problems for our school districts. The DEIS is a very short sighted in that regard. (Individual, Sagle, ID - #5438.93740)

Will the states be expected to enter into land exchanges with the federal government since the state lands will be "landlocked" through the implementation of the proposed rule? (Timber Company or Association, Eugene, OR - #15879.90311)

We need access to state and private lands by crossing public lands. The Trust Lands Administration continues to manage approximately 15,000 acres of school trust lands in Utah the lie within National Forest Service boundaries. Most of these lands are in the form of scattered 640-acre section surrounded by national forest lands. Existing law provides the state with a right of reasonable road access to all of these trust lands. Inholdings and private lands adjacent to public lands must have access right-of-way maintained and guaranteed. (Individual, West Point, UT - #4008.90310)

In Wyoming, five (5) sections of trust lands would be affected by the roadless proposal. While it is difficult to determine the exact funding deficit that would result from loss of access or restricted access, the land itself has an estimated value of $1,000 per acre. Thus, five (5) sections, each being 640 acres equals 3,200 acres which would thus equal $3.2 million, the present worth. This does not account for any loss of future benefits that might be derived from resources/uses of the land. Also, the 3,200 acres does not include school trust lands in the Thunder Basin National Grasslands as that planning process is not complete and therefore the nominations for wilderness designations are not finalized. … The proposal may deny the reasonable right of access to their [forest inholders'] lands pursuant to 16USC [Section] 3210(a) that requires the Secretary of Agriculture to provide access to non-federally owned land within the boundaries of the National Forest System as the Secretary deems adequate to secure to the owner the reasonable use and enjoyment thereof. (State Elected Official, Cheyenne, WY - #2816.90310)

For those sections of state land affected by the roadless proposal there is a concern that the potential to develop recreational opportunities will be lost. (State elected official, Cheyenne, WY - #2816.91000)

The proposed rule contains a vague reference to the need for access to inholdings within roadless areas: "a road may be constructed or reconstructed in an inventoried roadless area if the responsible official determines that…9a) road is needed pursuant to reserved or outstanding rights or as provided by statute or treaty." Proposed Rules (section) 294.12. This ambiguous language should be clarified to assure access to state and private inholdings, especially state endowment lands. Without such guarantees, the Idaho Department of Lands estimates that the proposed rules may result in losses of over 163 million dollars to the Idaho school endowment fund over the next thirty years.
In addition, there should be additional clarification that the Forest Service will not otherwise render access impracticable or uneconomical through the imposition of unnecessary restrictions. And, most critically, it should be clarified that in allowing such access, the Forest Service will not attempt to impose restrictions on the management of the inholding as a condition of granting access. (State Elected Official, Boise, ID - #18645.90310)

The DEIS fails to address the States' scoping comments. The State of Idaho spent enormous time and effort telling the Forest Service that our endowment lands must be completely isolated from any impact. We testified in public meetings during scoping, we submitted detailed written comments on this issue, and we went to a federal court to plead our case. The court agreed that our endowment lands are legitimate concerns. Many other states expressed similar concerns with endowment or school trust lands. Regardless of our effort, the DEIS does not even mention "endowment lands," or "school trust lands". Instead, all we see is a statement in the proposed rule that the roadless proposal "will not have substantial direct effects on the states". The Forest Service's failure to address our comments is unacceptable. (State Elected Official, Boise, ID - #13571.90310)

We cannot find a clear statement of how the proposal would affect land owners who are surrounded by, or adjacent to, proposed roadless areas as it relates to needed access through roadless designated lands. In Chapter 3, under "Real Estate Management", the DEIS states that under Alternatives 2 through 4,"…a potential effect on non-recreation special uses may result in a limited number of proposals or future proposals from being considered for authorization…" and that "special uses may be authorized in inventoried and other unroaded areas when the use and occupancy is consistent with the management objective's of an area's roadless values." (Page 141) It is not clear whether access to adjacent lands is considered a "non-recreation special use", and also unclear whether such use would possibly be considered "consistent with the management objectives of an area's roadless values." (State Agency, Olympia, WA - #17285.90300)

If the Forest Service adopts the preferred alternative, this close proximity to roadless areas will likely bring about public political expectations for how those adjacent school trust lands should or should not be managed. While we do not have costs calculated for the additional public process and mitigation that would likely be required to manage adjacent school trust lands, I surmise that they could pose a significant burden to the trust beneficiaries. (State Elected Official, Helena, MT - #19289.90300)

MAKE ROADLESS AREAS ADJACENT TO STATE TRUST LANDS AVAILABLE FOR MINERAL LEASING

[T]he Trust Lands Administration retained approximately 15,000 acres of school trust lands within NFS boundaries even after P.L. 105-335 exchange. The majority of these sections are within the Wasatch-Cache National Forest, in an area--the Overthrust Belt--known to have extremely high potential for oil and gas exploration and development. Because effective development of oil and gas potential typically requires substantial acreage, in order for the inheld trust lands to be fully developed for oil and gas in accordance with the State's trust mandate, surrounding NFS lands must also be available for leasing. (State Elected Official, Salt Lake City, UT - #43919.55000)

Public Concern: The Forest Service should address the impacts of proposed rule on access for inholders.

We are deeply concerned that your Draft EIS did not include the following: Adjacent private property owners right of access to their properties, of which some are surrounded by national forest or the defined roadless areas. (Individual, Cave Junction, OR - #6769.71130)

Many Americans need access to their private lands, which are surrounded by national forests. (Individual, Imbler, OR - #8029.71130)

In addition many private landowners that have property that adjoins the Forest Service land make it difficult for individuals to cross their property to get to the Forest Service land. They should not be allowed to do this. (Individual, Tucson, AZ - #9446.71130)

The policy violates the rights of private inholders. Within the National Forests in the South, there are thousands of acres of private inholdings. In Mississippi only about 55 percent of the land within the proclaimed national forest boundaries are in federal ownership. Under this policy, many private landowners could either be denied access or at least be charged fees to reach their lands. (Forest Products Company, Hermansville, MS - #10763.71130)

The best I can determine from an 800% enlargement of the internet map is that you have included some of my property in the roadless area, plus you are limiting existing access to my property. This is not acceptable. (Individual, Enid, OK - #80.90310)

If the Forest Service insists on going forward, a new NOI should be developed that includes: takings implications on inholdings. (Individual, Titusville, PA - #905.90310)

It does not appear that an analysis regarding road access to private property has been performed. What considerations or analysis have been made regarding ingress and egress for private property rights pursuant to 16 U.S.C. Sec. 1134? Please provide copies of such studies, maps, analysis, etc relating to closing roads in areas where private property rights. (County Commissioner, No Address - #47983.90310)

Public Concern: The Forest Service should acknowledge that easement by necessity doctrine, whereby a grantor cannot landlock his grantee, also applies to the federal government.

The federal courts have recognized that the easement by necessity doctrine, whereby a grantor cannot landlock his grantee, applies to the federal government. In other words, no seller, including Uncle Sam, can deny a right-of-way to his purchaser. Leo Sheep Co. v. US, 440 US 668, 679 (1979) and 4 Powell on Real Property, [Section] 34.07 (rev. ed., 1997).
In fact, 36 CFR [Section] 251.114(f)(1) requires a federal officer issuing a special permit to ensure that the inholder "has demonstrated a lack of any existing right of access available by deed or under State or federal law", which is, of course, an official recognition of the doctrine.
In US v. Jenks, No. 96-2106, the Tenth Circuit Court of Appeals acknowledged that pre-existing rights to access defeat the requirement for special use permits for road easements and that even without pre-existing rights of access, an inholder has statutory right to an easement from the government, with reasonable terms and conditions, under 16 USC [Section] 3210(a).
However, if an inholder can demonstrate that his right-of-way is a public road under Section 67-2-1, NMSA, 1978 Comp., (which, as you know, is New Mexico's RS 2477 acceptance) then a special use permit is not required or even allowed to be issued, under the above quoted statute's State law exemption.
Each inholder must decide himself whether it is cheaper and easier to submit and pay for a special use permit or to resist and prove to the government agents that he has no legal requirement of one. (County Elected Officials, Reserve, NM - #43567.90320)

Public Concern: The Forest Service should allow the construction of private roads in close proximity to designated roadless areas to minimize environmental damage.

A member company has planned and designed new roads under environmentally sensitive Best Management Practices (BMPs) to be constructed on private lands in the Fatty Piper area near Flathead National Forest as well as on private lands near the Horsehead Peak, Little Bear Creek, and McCormick Creek areas of Lolo National Forest. These planned roads, while fully on company land, could be opposed by the Forest Service simply because they would be "near" a designated roadless area without being actually within the roadless area. In the recent past, the Forest Service has opposed road construction on the company's lands simply because the planned road was "near" a roadless area. In 1991, our member company submitted access request to the Flathead National Forest for a road in the Sullivan Creek drainage. It was almost two years before the Forest Service notified them that the request was denied because of the proximity that the road would have to a roadless area. The company was then forced to construct an alternative route solely across its land, requiring it to build a bridge over Sullivan Creek (which the original proposal would have avoided) and construct .75 miles of additional road over steep terrain that involved other creek crossings. (Timber Company or Association, Eugene, OR - #15879.71130)

Public Concern: The Forest Service should allow access to existing roads and new road construction for private property access inasmuch as building alternative route on private land would cause greater environmental damage.

In the Scout Camp area of Lolo National Forest, also in western Montana, one of our member companies has requested a permit and an easement to use existing roads on Forest Service land that, under the new rule, is designated to become a roadless area. If these adequate existing roads are abandoned and obliterated to create a new roadless area, the company would have to build new roads on both its land and other Forest Service lands to maintain access to its property. This new construction would create significantly greater environmental impacts to the landscape in the area that would occur through the use and maintenance of the existing roads. In the Mike Creek area of Lolo National Forest, one of our member companies submitted an easement request to the Forest Service to access 160 acres of its lands. The company would reconstruct a bridge crossing across Mike Creek that is no longer there. If a roadless area is designated as per the proposed rule, the company would have to build a very steep road through rocks and cliffs to access the isolated 160-acre parcel. Use of the already existing roads, and use of the current bridge crossing (which the company would reconstruct at its own expense), would have much less environmental impact than constructing the new road solely through company land. (Timber Company or Association, Eugene, OR - #15879.71130)

In the Scout Creek drainage of Flathead National Forest in western Montana, if a roadless area were to be created as per the rule, one of our member companies would have to construct a much longer road (1.5 miles more) over its own land on a very steep (60-70% grade) open slope, through talus and rock outcrops, to access a 200-acre tract of our land with high-quality timber. This road would have a significant visual impact on residents and people passing through the Swan Valley, and it would likely have a negative impact on grizzly bear habitat and passage. The logical alternative would be a road that has already been proposed and designed. It would be much shorter and on a much gentler grade through some Forest Service land. Such a road would have fewer negative environmental impacts, less visual impact, and would cost at least $30,000.00 less to construct than the longer road through steep, open and highly visible terrain to keep the road solely on private property. (Timber Association, Kalispell, MT - #53304.90310)

In the Scout Camp area of Lolo National Forest, also in western Montana, a Montana timber company has requested a permit and an easement to use existing roads on Forest Service land which, under the new rule, is designated to become a roadless area. If these adequate existing roads are abandoned and obliterated to create a new roadless area, the company would have to build new roads on both its land and other Forest Service lands to maintain access to its property. This new construction would create significantly greater environmental impacts to the landscape in the area that would occur through the use and maintenance of the existing roads. (L, Kalispell, MT - #53304.90310)

Public Concern: The Forest Service should consider the positive impacts of the proposed rule on private property values.

Protecting natural environments such as roadless areas can increase the property values of adjacent private lands, sometimes significantly. One case study indicated an increase of 13% in the value of private property adjacent to the Green Mountains in Vermont. (Individual, Dickinson, ND - #16095.71130)

6.8.3 Land Exchanges and Acquisitions

Some citizens believe the Forest Service should purchase inholdings and acquire more land. Some offer that caveat that "Any land trades--from or to--the roadless areas should be critically analyzed by a team of qualified neutral professionals with the authority to pass or reject the proposal." Others feel the Forest Service should address current deficiencies in the

evaluation and appraisal of proposed land exchanges. Another individual specifically requests the Forest Service refrain from selling or trading public forest land for development.

"Certain portions of the coal estate acquired by the State of Utah in the P.L. 105-335 exchange underlie areas in the National Forest System apparently within the areas subject to the proposed regulation," states one elected official who requests assurances that access to resources underlying these exchanged lands be guaranteed by exempting them lands from the proposed rule.

Public Concern: The Forest Service should purchase inholdings and acquire more land.

Inholdings! The U.S. Forest Service should be buying-out inholdings within the national forests with every opportunity and "rounding-out" their (our) property boundaries, and, thereby, eliminating the need for maintaining roads for other than cost-effective and essential purposes. (Individual, Geneva, NE - #1788.90310)

I also was not sure if this applied to private lands. If so, then I think that is wrong. People can do what they want with their own land. If the government feels strongly about an area, then they should purchase the land. (Individual, Fort Collins, Co - #2506.90310)

Increase the number of acres in forests. (Individual, Solidew, WY - #3509.23000)

Extinguish, with financial compensation, all private holdings within designated wilderness and roadless areas. (Individual, Spokane, WA - #18777.64000)

Acquire all inholdings. (Individual, Minneapolis, MN - #15017.63000)

Public Concern: The Forest Service should address current deficiencies in the evaluation and appraisal of proposed land exchanges.

While the Forest Service may not feel this additional comment is germane, we cannot avoid objections to ill-advised Forest land sales and exchanges. There have been many inexcusable examples of this, involving incompetent appraisals and failure to compare values in land exchanges, among other deficiencies. (Preservation Organization, Huntertown, IN - #2756.90310)

Any land trades--from or to--the roadless areas should be critically analyzed by a team of qualified neutral professionals with the authority to pass or reject the proposal. (Individual, Spokane, WA - #3124.64354)

Public Concern: The Forest Service should refrain from selling or trading public forest land for development.

Refrain from selling or trading public forest land for development. (Individual, Albuquerque, NM - #70949.90100)

Public Concern: The Forest Service should exempt lands exchanged under P.L. 105-335 from the proposed rule.

The Trust Lands Administration and its educational beneficiaries are concerned that the proposed regulation could cause it to partially lose the benefits of the lands offered by the United States in the P.L. 105-335 exchange. The proposed regulation must reflect the following: P.L. 105-335 LANDS SHOULD BE EXEMPTED FROM THE PROPOSED RULEMAKING. Certain portions of the coal estate acquired by the State of Utah in the P.L. 105-335 exchange underlie areas in the National Forest System apparently within the areas subject to the proposed regulation. As stated above, the proposed regulation indicates that new or reconstructed roads are prohibited in inventoried roadless areas, subject to valid existing rights. Also, the second part of the proposed regulation may prohibit activities within yet to be determined unroaded areas. In either case, and even if the Trust Lands valid existing rights are taken into account, such alternatives could have a significantly negative impact upon the economic viability of these coal deposits. All coal to be mined from these lands will be mined by underground methods; however, road construction and other surface disturbance may be necessary for exploration drilling, ventilation shafts, portal access and construction, and various other ancillary facilities. Surface disturbance can also be expected from subsidence effect at the time of mining. All of these disturbances will be fully reclaimed at the end of mine life, but in the interim are a necessary adjunct to coal development. (State Elected Official, Salt Lake City, UT - #43918.55000)

6.8.4 Transfer of Effects to Private and Other Public Lands

Many respondents request the Forest Service consider the effects of increased noxious weed, disease and fire occurrences on adjacent non-Forest System lands due to lack of management in roadless areas. One state agency asserts that the Forest Service may have to assume financial liability for fire and insect damage to non-federal lands. Others state the Forest Service should consider the effects of transfer of timber harvest to non-federal lands which may result from the proposed rule. They fear that countries with even more relaxed environmental rules will suffer increased ecosystem damage as they increase their own harvest levels to compensate for decreased federal timber. However, one timber company asserts that because this is a likely outcome, the Forest Service should provide the science, information, and incentive programs necessary for private, state and foreign producers to provide an increased, sustainable share of the timber and livestock production in the United States.

The Forest Service should address the off-site impacts of expanding wildlife populations, others say. County elected officials state, “The Forest Service needs to disclose the potential impacts of growing populations of wildlife species that may result in off-site impacts, such as grizzly bear, wolf, elk, and deer. Basically, populations in a growth mode result in migration resulting in potential depredation, human encounters, effects on livestock, and even domestic pets.”

Conversely, some respondents see positive benefits to adjacent private property from the proposed rule because unlogged and unroaded areas are help to protect private property from landslides and flood damage.

Public Concern: The Forest Service should consider the effects of increased noxious weed, disease and fire occurrences on adjacent non-National Forest System lands.

The proposal increases the risks of diseases and fires, particularly to adjacent non-industrial private forestland owners. (Business/Business Association, Raleigh, NC - #8091.90310)

This document should clearly define how this proposal affects state and private timber resources. Insects, fire, and disease that are transferred from the federal forests will have an adverse affect on State and private ecosystems. (Individual, Eagle, ID - #8450.90310)

The DEIS states that "Landowners with property adjacent to public lands benefit from enhanced property values." (Page 3-169) Under ideal conditions this may be true. Our property, which borders national forest land, is managed under a State approved forest management plan. We have gone to great lengths and expense to maintain a healthy and fire-resistant forest. But that cannot be said for the Forest Service. Their land, which is upwind from us, is essentially not managed at all. It is overstocked and thick with brush and other ladder fuels and creates a serious fire threat to our property. Much of it is in Wilderness, and another 600+ acres is now identified as "roadless" which means that the fire threat will only get worse. That certainly does not increase either our peace of mind or our property value. (Individual, Markleeville, CA - #13284.90310)

Under current forest conditions, following years of fire suppression, many of our unmanaged wildlands are doomed to experience catastrophic fires, such as the Los Alamos fiasco. These fires can spread into surrounding managed forests, private property and communities. This rule making and the DEIS fail to adequately address this important issue. Los Alamos was a wake-up call they had best heed. (Recreational Organization, Saint Charles, MN - #6878.84200)

Comment: General-- Natural events, such as fire, transcend political and administrative boundaries. Any analysis must consider the effects of fires "boundary-less behavior " The alternatives must be analyzed in context of the direct, indirect and cumulative effects on entire ecosystems and just not on Forest Service administered lands. The wildland urban interface, air quality, and any anticipated impacts to private landowners and private in holdings are all issues that must be disclosed. This section is well written and has a good deal of supporting data and information, but does not adequately disclose predicted effects with the "hard look" that is required by CEQ Regulations. Relief: The Forest Service must address the effects of the risks identified relating to the wildland urban interface, air quality, and other private and public ownerships. (County Elected Official, Worland, WY - 16185.71100)

Most of the write ups also comment on the amount of Leafy Spurge in the areas which, if not controlled, will have major effects on adjacent lands. Although I have not read the Roadless DEIS in detail, I do not see this category (Effects on adjacent Lands) covered in the Roadless IES. The DEIS should be withdrawn and this subject included in detail. (University/Professional Society, Laramie, WY - #25484.90010)

Public Concern: The Forest Service should address its potential financial liability for damage to non-federal lands.

The inability to access areas in a timely manner for insect, disease, or fire suppression will result in large disturbances that may not be able to be contained within the roadless areas. The resulting damage to non-federal property will create liability issues for the federal government and is unacceptable. (State Agency, Cheyenne, WY - #15889.70000)

Public Concern: The Forest Service should consider the transfer of effects of timber harvest to non-federal lands which may result from the final rule.

In Idaho, the Federal Government manages 64% of the State lands. The reduction in NFS harvests has concentrated harvest on non-Federal lands, causing greater damage to those areas. I have not seen this addressed as a consequence of curtailing harvests due to roadless area restrictions. (Business/Business Association, Princeton, ID - #417.71100)

The proposal mentions the possibility of these roadless areas serving as ecological anchors, allowing nearby federal, state, and private forests to be developed for economic purposes. The proposal should specify the tradeoffs, so the public can judge for themselves what will be gained or lost from this action. (Individual, Eagle, ID - #8450.90100)

While the initiative does not prohibit logging, it makes the cost of removing the products too high. It will require that it all needs to be done by heli[copter], not by ground transportation. Only large (generally old growth) timber is economically removed by heli[copter]. So the land is effectively removed from the production of timber and fiber products since old growth is not to be taken from public land with out extensive litigation due to special interest groups. So we will increase the pressure on that land that is left for fiber production. Private land is going to suffer as it will produce what is needed regardless of its ability to do so for a long continued period of time. At least Public land is very controllable by the public through the court system and through a process like this. (Individual, Bemidji, MN - #6275.93600)

Given a stable demand for timber products, when we lock up more timber from the inventory of harvestable forest, we shift the meeting of that demand to countries that have poor or non-existent forestry management. Those countries will provide timber without regard of the impact on future generations of poor forestry practices. (Individual, Ketchikan, AK - #199.93800)

With President Clinton wanting to take valuable U.S. land out of production, he is only shifting the supply to another part of the world, and in all likelihood to a place where greater environmental harm will occur. (Individual, Moscow, ID - #4007.93800)

Page 3-11--This section also makes a statement that "This analysis assumes that reductions in timber volume resulting from any of the prohibitions would not be replaced with timber volume from other National Forest System Lands." Other sections make the assumption that replacement volume would come from other sources, such as private ownerships and Canadian imports. The questions that need to be addressed are: 1) Will shifting the harvest to private ownership and Canada create a cumulative impact on other sensitive areas, species, and resources identified in the document? and 2) will the impacts potentially be more severe than those occurring on National Forest System lands?
RELIEF: The Forest Service must quantitatively analyze the affects of this statement on local communities, other environments (private lands and Canada), and the national demand for raw materials and address the questions of cumulative impacts to Canada and private lands. (County Elected Officials, Basin, WY - #43980.90010)

Page 3-9, 5th paragraph - A reference is lacking for the statement "The increasing demand for wood fiber will be met through a combination of international trade and domestic supply." What combination of trade and domestic supply? Are there cumulative effects associated with this shift in supply? This should be addressed and any potential effects disclosed. (County Elected Officials, Rawlins, WY - #15910.93100)

Public Concern: The Forest Service should provide the science, information, and incentive programs necessary for private, state and foreign producers to provide an increased, sustainable share of the timber and livestock production in the United States.

As commodities production continues to slide, and resource consumption continues to increase per capita and population increases, it is clear that the difference in timber and livestock production will be made up by state and private lands in the United States, and by imports. If that proves to be so, it seems appropriate to place increased emphasis on efforts by FS units in the arena of state and private forestry, research, and international forestry programs, and proportionately less on management of national forests for timber and grazing. Such shifts are not only pragmatic in that there will be increased pressure on those private lands to produce more commodities from an ever-decreasing land base. Given the ramifications of such a shift in forest policy, it is an equally necessary policy to provide the science, extension of information, and incentive programs to encourage both industrial forest land owners as well as non-industrial forest land holders to provide an increased share of the timber and livestock production in the United States in a sustainable, acceptable fashion." (Timber Association, Medford, OR – #13658.20000)

Public Concern: The Forest Service should evaluate the value of unlogged and unroaded areas as protection for private property from landslides and flood damage.

These unlogged and unroaded areas also protect private property from landslides and flood damage. (Town Elected Official, Minneapolis, MN - #5392.71130)

Public Concern: The Forest Service should address the off-site impacts of expanding wildlife populations.

Terrestrial Animal Habitat and Species Comment: Page 3-75, Alternative 2-- The assumption for the "Proposed Action" states that "NO adverse direct, indirect, or cumulative environmental effects to terrestrial animal species and habitats would be expected..." All the arguments under the "No Action" alternative potentially mean larger populations of species that do not necessarily respect roadless area boundaries. The Forest Service needs to disclose the potential impacts of growing populations of wildlife species that may result in off-site impacts, such as grizzly bear, wolf, elk, and deer. Basically, populations in a growth mode result in migration resulting in potential depredation, human encounters, effects on livestock, and even domestic pets. An example of areas where this has occurred is Yellowstone (grizzly bears, wolves, bison, and elk) and the Rocky Mountain Front in Montana (grizzly bears and wolves). Relief: The Forest Service must identify the potential off-site impacts of expanding wildlife populations and potential indirect effects on people living in rural and semi-urban areas. (County Elected Official, Worland, WY - 16185.71100)

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 untrammeled 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 worshipers, 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. Edgecumbe 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 to 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 viewsheds 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 Monies, 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 minimized 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 my 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 Marlington & 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 though 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, Sheridon, 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 al 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 mangers 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 Delores 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, theses 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 netable 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 civilities of SMC and other companies. If the Forest Service proposal is adopted significant areas of the SMC mining claim group along the comples 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 presumable 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 Delat 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 form 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 SHOULDER 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 shear 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 REPONSIBILITIES. 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, show-shoeing, horse-back 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)

Chapter 8 Cumulative Effects Analysis

This chapter presents public comment concerning the impacts and effects of the numerous concurrent planning processes and rulemakings. Section 8.1 covers public comment on the relationship between the proposed rule and other planning processes and current rulemaking initiatives. Section 8.2 covers public concerns regarding the adequacy of the cumulative effects analysis of the proposed rule, both independently and in combination with other current planning processes, rulemaking initiatives, and environmental legislation.

8.1 Relationship to Other Forest Service Planning Processes and Proposed Rules

Many respondents raise a number of concerns over the relationship between the proposed rule and other planning processes, plans, and projects. Although some say they do not see any conflict between these concurrent national initiatives, the majority of those who comment on this topic believe the Forest Service should present a more detailed explanation of how they interrelate, and what their cumulative effects will be. Indeed, this concern makes up one of the common themes running through public comment on the proposed rule.

In particular, many respondents express concern over the relationship between the proposed rule and the two concurrent national rulemakings, the proposed revisions to the Planning Regulations and the proposed Road Management Rule. A great many writers question the proposed rule's relation to the forest planning process in light of provisions outlined in the Planning Rules.

Others question the relationship of the proposed Roadless Area Conservation rule with a specific regional or interagency planning effort, such as the Interior Columbia Basin Ecosystem Management Project and local Habitat Conservation Plans. Finally, a number of writers question the relation between the proposed rule and whole lists of other ongoing planning initiatives. Many discuss the interrelationship between all three national rulemakings. As one respondent puts it, "It is not possible at this time to fully understand the interaction and potential ramifications of the Roadless DEIS, Road Management Plan, Planning Rule, and Strategic Plan plus any future policy documents or rules that may arise while these documents are under review. It is unreasonable to expect the public to read and fully understand the overall management direction of the agency by looking at the individual documents in piecemeal."

Respondents suggest two different ways to address potential conflicts and overlapping efforts created by the 3 national rulemakings: 1) to address them sequentially; and 2) to integrate them. According to the first suggestion, the Forest Service ought to propose rules in a logical sequence. "There are two consequences of this concurrent, disjointed approach to rulemaking. The Draft EIS mentions the first of these -- that some or all of these proposals may have to be changed to integrate the policies from the others. Thus, changes in the final planning amendments…would affect the substance of the roadless initiative or the transportation policy. Likewise, changes in either of the road policies would affect the regional plans. By floating these proposals

concurrently, instead of in logical sequence, the agency is wasting considerable time and money on developing proposals that may have to be changed," maintains one writer.

Another respondent argues that "these efforts should be taken in a sequence that simplifies the process. For example, the document identifies the Forest Planning Rule Revision as the umbrella by stating that 'the final planning rule would provide the overarching framework for implementing the final road management rule and the final roadless area conservation rule.' If this is the case, then the Forest Planning Rules should be decided upon first. Then a proposal should be released on the 'process alternatives' for the Roadless Conservation Rule that would address issues and criteria. A final rule would then direct local forest managers to decide on the criteria needed to manage, protect, or preserve certain areas through the forest planning process." Some also suggest that the proposed rule should not proceed until disagreements over certain terms and definitions have been settled.

The other suggestion respondents make is that the Forest Service integrate the proposed rule with other concurrent initiatives. In fact, according to one view no formal integration is required inasmuch as the proposed rule's objectives are already being met by other policies. Some writers suggest, for example, that the "proposed rule for a long-term transportation policy eliminates any need for a separate policy on roadless areas. . . . .The transportation policy adequately covers road and roadless related issues, [hence] inclusion of the procedural alternatives in this rule is redundant and confusing."

Another respondent notes that according to the Draft EIS, the Forest Service may yet integrate and clarify provisions within the Land and Resource Management Planning Rule, the Transportation Policy, and the Roadless Area Conservation Proposed Rule to ensure consistency, clarity, and effectiveness. "While this seems prudent," asserts this writer, "these principles could also be addressed through one proposed rule, such as the proposed Land and Resource Management Planning Rule, which already addresses requirements to consider some of the same issues which the USFS is attempting to address in the other proposed rules."

Finally, another respondent notes that the Forest Service is proposing to maintain in perpetuity the roadless character of all inventoried roadless areas, and is proposing to require additional evaluations at the time of forest plan revisions for uninventoried unroaded areas. If these proposals are adopted, this writer argues, "The regulations relevant to making decisions on uninventoried unroaded areas would be strewn across three different parts of the C.F.R., plus several sections of the Forest Service Manual. This would create chaos and confusion for those Forest Service employees and those members of the public who must try to figure out what studies are required, and what the decision-making standards are, to construct a road in a currently unroaded area in a national forest." The problem, according to this writer, is that the proposed management of roads in unroaded areas has been arbitrarily divided into different proposals, hence the result will be confusion and misunderstanding over how decision making should proceed.

In summary, respondents are concerned over the proposed rule's relationship to other planning projects. They stress the need for a coherent analysis of the relationship between all the various planning efforts and their cumulative effects, and suggest either that the initiatives be presented

in a more logical sequence or that they be systematically and coherently integrated. On a more detailed level, one writer asks that the Forest Service evaluate the current forest plan direction for each roadless area.

Public Concern: The Forest Service should elucidate the relationship between the proposed rule and concurrent rulemaking initiatives.

RELATIONSHIP TO THE ROAD MANAGEMENT RULE

There is confusion about where the Transportation Policy and Roadless area Conservation decision overlap. (County Elected Official, Quincy, CA - #16184.72220)

It is true [that] the National Forests contain thousands of miles of roads -- some surplus and not needed and many in need of maintenance and improvement. This issue is being addressed with the proposed NFS Road Management and Transportation System Rule. Road management strategies to be implemented by the Forest Service could come from this process. The road management rulemaking should be completed before any further rules are proposed. (Recreational Organization, Wenatchee, WA - #43201.72220)

If the Roads Policy is finalized, there may be additional requirements imposed before these exceptions can be utilized, including an EIS, transportation analysis, and approval of the regional forester. There must be consistency between the two policies. (Environmental/Preservation Organization, Asheville, NC - #43412.72220)

RELATIONSHIP TO FOREST PLANNING REGULATION REVISIONS

A charge made at the June meeting was that the Forest Plan Amendments and Roadless initiatives conflict. I have read important portions of both and I am pleasantly surprised how well the Forest Plan Amendments carefully weaves in whichever Roadless Alternative is selected, especially 3 or 4. (Individual, Twain Harte, CA - #29869.72230)

THE PROPOSED ROADLESS AREA RULES ARE INCONSISTENT WITH THE PLANNING RULES' PROVISIONS ON CONSISTENCY WITH FOREST PLANS AND THE NEED FOR PLAN AMENDMENTS. Existing forest plans allow roads in 33.8 million acres of inventoried roadless areas in which the roadless area rules propose to override forest plans without any consistency determination or forest plan amendment. This is unlawful under the NFMA and the Statewide Wilderness Acts. By not making consistency determinations or completing plan amendments, the roadless area rules also are contrary to the proposed forest planning rules. The proposed planning rules prohibit implementation of any new policy (including the roadless area policy): (1) until it has been found to be consistent with the forest plan; or (2) if it is not consistent, until the Forest Service analyzes the effects of possible plan amendments and amends the forest plan to permit implementation of the policy. SEE 64 Fed. Reg. 54099-101, proposed 36 C.F.R. 219.6-219.10.
Thus, the direction of the roadless area rulemaking (that forest plans can be ignored) is fundamentally inconsistent with the approach of the forest planning rules (that forest plans are controlling). The Forest Service must address this fundamental inconsistency in approach before proceeding further on the roadless area proposal. The proposed planning rules allow "roadless areas" to be designated only "through the [plan] amendment or revision process," 64 Fed. Reg. 54107, proposed [section] 219.27(a). This confirms that the roadless area proposal concerns precisely the type of multiple use decisions that should be made through forest planning. Thus, in this way as well, the proposal to designate roadless areas through rulemaking and without amending the forest plan is inconsistent with the proposed planning rules. (Timber Association, Eugene, OR - #15879.72210)

The roadless area rulemaking conflicts with this Administration's proposed forest planning rules. The proposed planning rules confirm that all land use direction must be included in an integrated, updated forest plan, 64 Fed. Reg. 54108-09 (Oct. 5, 1999), proposed [sections] 219.30 and 219.31. The Forest Service should correct the inconsistency by either abandoning the misguided roadless area proposal, or by conducting the plan amendments clearly required by the NFMA and Forest Service policy. LACK OF SCIENTIFIC ANALYSIS AND

JUSTIFICATION. The agency's proposed planning rules emphasize the role of science and the need for detailed analyses before taking actions affecting the National Forest System. SEE 64 Fed. Reg. 54095-54112 (Oct. 5, 1999), particularly proposed [sections] 219.2, 219.8, 219.19-219.24. Those sections emphasize the need for scientific "assessments," for "science consistency evaluations," and for a strong role of "scientists in planning."
Yet, the Forest Service is proposing permanent prescriptions for 54.3 million roadless acres without providing: (1) a convincing scientific explanation as to why each and every roadless acre must be kept roadless; or (2) a roadless area-by-area analysis of that prescription's impacts on issues such as protection of the forest against fire and disease, providing sufficient roaded recreation in the future, meeting future needs for timber and mineral resources, public desires for the use of each roadless area, etc. Thus, this rushed rulemaking on roadless areas is inconsistent with the study and analysis objectives in the contemporaneous planning rulemaking. (Timber Association, Eugene, OR - #15879.72210)

Consistent with 16 U.S.C. [section] 1604(h), a Committee of Scientists helped to shape the proposed planning rules. SEE 64 Fed. Reg. 54075 (Oct. 5, 1999). A Committee of Scientists has not been consulted on the roadless area rules. The Forest Service should not proceed further with the roadless area rules until a Committee of Scientists reviews them: (1) to determine whether there is an objective biological need for a roadless area rulemaking of this magnitude; (2) to provide advice on whether broader exceptions from the roadless area policy should be allowed to protect forest health; and (3) to remove or minimize the conflicts between the roadless area and planning rules.
LACK OF SITE-SPECIFIC ANALYSIS. Other sections of the proposed planning rules require site-specific environmental and economic analysis in plan amendments before changing the direction of the forest plan. SEE 64 Fed. Reg. 54098-109 (Oct. 5, 1999), proposed [sections] 219.3-219.10, 219.20, 219.21, 219.30, 219.31. The lack of site-specific analysis of the effects of the roadless area rules on forest health and other resource values is another way in which the roadless area rulemaking is inconsistent with the Forest Service's own proposed planning rules. The Forest Service should resolve all of these inconsistencies in approach before proceeding further with the roadless area approach. (Timber Association, Eugene, OR - #15879.72210)

The roadless area rulemaking is inconsistent with the planning rules' requirements that all land use direction be incorporated into the forest plan. Though the roadless area rulemaking would prohibit certain land uses in 28% of the National Forest System (the acreage in inventoried roadless areas), the rulemaking proposes to not incorporate this land use direction into the forest plans through a plan amendment or revision. As a result, when the public consults the forest plan that is the controlling document under the NFMA, the public will have inaccurate information on the allowed uses on at least 33.8 million acres of the National Forest System. (Timber Association, Kalispell, MT - #53304.72210)

I believe the Forest Service must modify its current proposal and support Prohibition Alternative 1 and Procedural Alternative A because the preferred alternative would undermine its own planning and decision making processes and essentially render forest plans meaningless. The tens of millions of taxpayer dollars spent in developing forest plans and in encouraging public input on land allocations in a particular national forest will be wasted if any Administration may freely disregard forest plans by adopting a politically expedient rulemaking. The rulemaking sends a message to the public that it is worthless to expend their energy in helping to develop an acceptable forest plan, because the agency can alter the agreed-upon forest plan on a whim through rulemaking. It would reduce the integrity of the forest planning process and reward extremist, anti-timber groups and their willingness to compromise. (Individual, Isle La Motte, VT - #50619.72100)

The NFMA [National Forest Management Act] requires that, once the governing forest plan has been prepared at great public expense, all "resource plans... and other instruments for the use and occupancy of National Forest System lands shall be consistent with the land management plans," 16 U.S.C. [section] 1604(i). This proposed rule fits squarely within the meaning of [section] 1604(i) because it provides a long-term "resource plan" (no roads) for over 50 million acres of inventoried roadless areas in the National Forest System. The proposal also is subject to the [section] 1604(i) "consistency" requirement because it would control the "use and occupancy" of roadless areas. 16 U.S.C. [section] 1604(i).
Thus, under the plain language of [section] 1604(i), the roadless area rulemaking could take effect immediately only where it is "consistent" with the 124 forest plans the Forest Service has formally adopted. The rulemaking is INCONSISTENT with the governing forest plans because it would CHANGE MANAGEMENT DIRECTION on "33.8 million acres of inventoried roadless areas" - the acreage where the existing forest plans allow "road

building," but where the rulemaking would override the plans by prohibiting roads and road-dependent multiple uses. (Mining/Oil Company or Association, Washington, DC - #52224.72200)

RELATIONSHIP TO THE INTERIOR COLUMBIA BASIN ECOSYSTEM MANAGEMENT PROJECT

The effects of the Roadless DEIS and Proposed rule are in direct conflict with the science developed for the Interior Columbia Basin Ecosystem Management Project. The integrated scientific assessment for ecosystem management in the Interior Columbia Basin and portions of the Klamath and Great Basins (Quigley, Haynes, and Graham, 1996) and an assessment of ecosystem components in the Interior Columbia Basin and portion of the Klamath and Great Basins (Quigley and Arbelbide, 1997) concluded that there is a need to "aggressively restore ecosystem health through actively managing resources.... vegetation management to improve the likelihood of moving toward or maintaining ecosystem processes that function properly in the long-term. Vegetation management ... to reduce risks...that can result from large disturbance events"….One of the primary conditions identified was the overstocked condition of the forested land….(Integrated Scientific Assessment, p 138). (Individual, Colville, WA - #13519.23000)

RELATIONSHIP TO LOCAL HABITAT CONSERVATION PLANS

Efforts to maintain biodiversity should focus on identifiable ecoregions that are underprotected rather than make a blanket road ban in currently unroaded areas. This discussion (pp. 3-47 to 3-97) should be a reasoned process rather than simply locking up all lands considered "roadless." Currently, Nye County is developing a Multispecies Habitat Conservation Plan. Forest Service efforts should be coordinated with other efforts rather than be unilateral. (County Agency, Pahrump, NV - #16093.72230)

RELATIONSHIP TO MULTIPLE OTHER INITIATIVES

The Forest Service has failed to provide an understanding of how this Draft EIS and rulemaking relates to the proposed forest planning regulations or transportation system policy. It is premature to promulgate new direction and policy that are dependent on changes that cannot be implemented pursuant to current Agency regulations. The public must be made aware of how these proposed policy proposals relate to one another. We cannot expect the American public to comment on a part of an agency policy proposal. We have grave concerns for the number of administrative and legal challenges that these interrelationships between your agency's current and proposed policies potentially represent. Without clear and implementable administrative procedures, there will continue to be serious implications to the management of our National Forest System. (County Elected Official, Eugene, OR - #17252.72200)

We believe these 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 Nevada rulemakings are merely subparts of a single, major federal action led by the Forest Service. Our view is strongly supported by the unprecedented degree of linkage and overlap among the various proposals. Ironically, Mike Dombeck, Chief of the Forest Service, shares our view. In a letter dated June 30, 2000 to Forest Service employees, he stated, "Both the roads and roadless proposals dovetail with the proposed planning rules . . ." and, "These proposals and policies are reflected in our strategic plan and flow directly from the Forest Service Natural Resource Agenda. (Mining Association, Spokane, WA - #14725.72100)

A comprehensive evaluation and presentation of the complete agency management vision needs to be prepared and presented to the public that fully explains the potential cumulative impacts to the public of all of the major agency documents undergoing review and promulgation at this time. It is not possible at this time to fully understand the interaction and potential ramifications of the Roadless DEIS, Road Management Plan, Planning Rule, and Strategic Plan plus any future policy documents or rules that may arise while these documents are under review. It is unreasonable to expect the public to read and fully understand the overall management direction of the agency by looking at the individual documents in piecemeal. This approach leads to further erosion of trust when the public is surprised by changes resulting from this combination of administrative plans and rules. (Recreational Organization, Los Alamos, NM - #5663.72100)

The NEPA procedures require EISs to discuss the authority for the proposed action and possible conflicts between that authority, the proposed action and the objectives of other federal, regional, state and local land use plans, policies and laws. The EIS must consider the statutory, regulatory and executive order procedural evaluation requirements for the promulgation of the roadless and other proposals affecting Forest Service roads. (Mining Association, Reno, NV - #15907.72000)

There are several recent Forest Service initiatives that are indirectly related to the proposed rule including: 1) Proposed Regulations for the Recovery of Costs for National Forest Permits, 64 Fed. Reg. 66341 (November 24, 1999); 2) Notice of Draft Forest Service Strategic Plan (2000 Revision) which would establish ecosystem preservation as the primary goal in national forest management, 64 Fed. Reg. 66874 (November 30, 1999); 3) Proposed Unified Policy for ensuring a Watershed Approach to Federal Land and Resource Management to Provide Special Protection to Watersheds in the National Forest System, 65 Fed. Reg. 8833 (February 22, 2000). Also, other Forest Service regulatory proposals are appearing which relate to the subjects of the proposed rule. For example, Region 3 of the Forest Service has proposed a supplement to the Forest Service Manual (Part 2540) to restrict groundwater development in national forests and to restrict access over national forest lands for groundwater development and production from other lands, 65 Fed. Reg. 14238 (March 16, 2000). We understand that the Forest Service Headquarters is preparing instructions to other Forest Service Regional Offices to prepare similar supplements to the Forest Service Manual. It is within the setting of that multitude of Forest service access, land and water use restriction proposals that the impacts of this proposal must be considered. (Mining Association, Reno, NV - #15907.72100)

SPECIFIC FOREST PLANS

Please disclose how you will achieve the Medicine Bow National Forest forest plan objectives as described in the "Tie Camp timber sale" EIS if you adopt your proposed policy. The Tie Camp project proposed to enter areas adjacent to the Coon Creek and Encampment River "roadless areas" noted above. As the Medicine Bow National Forest disclosed in the "Tie Camp Timber Sale" EIS, mortality is exceeding growth in many of the stands in the analysis area….To achieve forest plan objectives the Medicine Bow needs to be able to manage the stands within areas included in your proposal. (Business, Laramie, WY - #27809.72230)

What is the maintenance backlog for roads on the CNNF [Chequamegon-Nicolet National Forest] both in dollar value and in miles of roads? How will this proposed rule impact those areas being considered for special management designation in the forest plan revision? (8.e, 8.f, 8.g) Will RNA's, SMA's and old growth be in 'competition' with roadless areas? Which will take precedence? (Individual, No Address - #17279.72200)

Public Concern: The Forest Service should complete the concurrent national rulemakings in a logical sequence.

…the proposed transportation policy will have an impact on the roadless initiative, and vice versa. The transportation policy proposes to emphasize the de-commissioning of old roads and making the approval of new roads much more difficult. It emphasizes a "minimum transportation system" in and through the national forests. With a minimum system in one part of the national forest and a complete ban on roads in most of the rest, it is easy to assume that access to and through national forests will be severely restricted.
Finally, both the roadless initiative and the transportation policy proposal will impact the regional proposals. Yet the development of these regional land management proposals continues as if these two road proposals did not exist. There are two consequences of this concurrent, disjointed approach to rulemaking. The draft EIS mentions the first of these--that some or all of these proposals may have to be changed to integrate the policies from the others. Thus, changes in the final planning amendments (if indeed they become finalized and withstand the inevitable court challenges) would affect the substance of the roadless initiative or the transportation policy. Likewise, changes in either of the road policies would affect the regional plans. By floating these proposals concurrently, instead of in logical sequence, the agency is wasting considerable time and money on developing proposals that may have to be changed. (Business, Bozeman, MT - #43196.72220)

BY ADOPTING THE PLANNING RULES FIRST

THE PROPOSED ROADLESS AREA RULES ARE INCONSISTENT WITH THE PROPOSED PLANNING RULES. The proposed rules regarding future management of roadless areas in the National Forest System (65 Fed. Reg. 30276, May 10, 2000) are inconsistent with the proposed rules regarding forest planning in the National Forest System (64 Fed. Reg. 54074 (Oct. 5, 1999). As will be developed below, the two sets of rules are fundamentally incompatible and are inconsistent in several important ways. It would be arbitrary for the Forest Service to simultaneously adopt the divergent approaches of the two rulemakings. The Forest Service should follow a rational order in deciding which rules to publish first, and should follow a hierarchy among the Forest Service's many proposed rulemakings. The most rational approach would seem to be: (1) to first decide the overall system for forest planning and multiple use decision making in final 36 C.F.R. Part 219 planning regulations; (2) only then should the agency consider adopting rules for specific areas (such as roadless areas); and (3) the agency should ensure that the specific area rules are consistent with the framework and approach of the final forest planning rules. Thus, we urge that the roadless area rulemaking be abandoned or postponed for now, and considered only if and when final Part 219 rules have been adopted. (Timber Company or Association, Eugene, OR - #15879.72210)

CONFUSION OF MULTIPLE EFFORTS. The document, due to representing a national scale effort, multiple substantive and procedural alternatives, and multiple rule making proposals is confusing and difficult to understand. Each of these efforts should be taken in a sequence that simplifies the process. For example, the document identifies the Forest Planning Rule Revision as the umbrella by stating that ". . . the final planning rule would provide the overarching framework for implementing the final road management rule and the final roadless area conservation rule." If this is the case, then the Forest Planning Rules should be decided upon first. Then a proposal should be released on the "process alternatives" for the Roadless conservation rule that would address issues and criteria. A final rule would then direct local forest managers to decide on the criteria needed to manage, protect, or preserve certain areas through the forest planning process. Even the Forest Service admits on Page 3-240 that the combination of rules may have a cumulative effect but cannot anticipate what they may be. In the next paragraph on page 3-240, the statement is made that the proposed planning rule does not specify criteria for roadless other than those for wilderness. If this is the case, it would be more prudent to "fix" the planning rule to include this criteria. (County Elected Official, Sheridan, WY - #51045.72210)

The Forest Service has recently proposed two other regulations and policies that address the management of the road and transportation system within the National Forest System. These other two proposed policies are the Proposed Land and Resource Management Planning Rule and the Proposed Road Management Rule and Policy. Without these proposed rules and policies in final status, none of what is proposed in the Preferred Alternative of the DEIS, or in the proposed rule to amend 36 CFR, can be considered for comment in appropriate context.
These proposed policies are inter-dependent and you continue to put the cart before the horse in proposing one policy after another that depends on the finalization of the preceding Proposed Land and Resource Management Planning Rule. We formally request, once again, that there be a withdrawal of all new policy proposals until after the new Forest Planning regulations are final and a 60 day public comment period regarding that final rule is accomplished.
None of the subsequent policy proposals regarding Roads Management and Transportation Planning, as well as the Roadless Area Conservation proposed policy, can be implemented without new and final Land and Resource Management Planning Regulations. Even public comment is premature without the context of final new Planning Regulations in place and for reference. (Business Association, Beaverton, OR - #52230.72100)

PUBLIC CONCERN: BY WAITING UNTIL TERMS AND DEFINITIONS IN THE TRANSPORTATION POLICY ARE ADOPTED

The EIS adopts the definition of roads as classified and unclassified. This has been challenged [and] has not been resolved. These definitions have been appealed under the Interim Road Rule and until both of these issues are resolved the Forest Service should not use these definitions in the EIS. (Individual, Vanci, WA - #15246.32100)

Each pending rule depends on the others and needs to be analyzed in the context of those other proposals. However, since the other documents have not been completed, we can't know what they will ultimately decree. Simple changes in one could have sweeping impacts on the effects of the others. An example of this is the definition of a road. The initial Road Management Strategy and the Roadless Area Conservation DEIS define a road as "a motor vehicle travel way over 50 inches, unless classified and managed as a trail." Because trails, including motorized

trails, are exempted from the proposed definition of a road and because motorized recreation is not precluded in Roadless areas under the current DEIS, we anticipate that the radical anti-access groups will be pressing to amend the definition of a road. Since their input was used to formulate this initiative, it is entirely conceivable that the definition will be changed in the final version of the Road Management Strategy, having a significant impact on OHV recreation under this Roadless Area Conservation proposal. However, until these decisions are made, it is impossible to analyze and make comment on certain implications of the Roadless rulemaking. (Business/Business Association, Arlington, VA - #43882.72100)

Public Concern: The Forest Service should integrate the proposed Roadless Area Conservation Rule with other concurrent rulemaking initiatives.

WITH THE TRANSPORTATION POLICY

There is no consistency between the roadless area policy and the long-term transportation policy. We believe that proposed rule for a long term transportation policy eliminates any need for a separate policy on roadless areas. Again, forest managers already have the authority to not build roads. The transportation policy adequately covers road and roadless related issues, and inclusion of the procedural alternatives in this rule is redundant and confusing. The transportation policy directs the Forest Service to analyze a wide variety of issues regarding roads, including plant and animal effects, threatened and endangered species, dispersed recreation, the utility of roadless areas for research, etc. While we disagree with many aspects of the long term transportation policy, it does provide appropriate direction for natural resource professionals to consider roadless values as they contemplate building new roads. Philosophically, this seems like a sensible policy for every acre of national forest land, not just roadless areas, but the roadless values must be values that can be directly attributed to not having a road not generalities that may or may not pertain to having a road as described in your rule. Before a land manager makes a decision about building a road, they should ensure that they are making the right decision that most benefits the resource and the users of the national forests. We hope the transportation policy will be modified based on our comments, however, giving the local manager guidance and letting that manager make the best decision for that unique area is appropriate. We also hope that the Forest Service ensures that the transportation policy will take precedence over all road related initiatives. The philosophy, if not the substance, behind the transportation policy makes sense. (Professional Association, Anchorage, AK - #43416.72220)

WITH THE PLANNING RULES

A-7, OTHER REGULATORY INITIATIVES. The Draft EIS (Summary, page 46) estimates that the proposed Land and Resource Management Planning Rule and Proposed Road Management Rule and Policy would provide a comprehensive and consistent strategy for managing National Forest Lands. However, this set of proposed rules, in addition to the proposed Roadless Area Conservation Rule, can also be perceived to create additional layers of bureaucracy. The Draft EIS (page 1-14) states that the Forest Service may choose to integrate and clarify certain provisions within each rule to ensure consistency, clarity, and effectiveness. While this seems prudent, these principles could also be addressed through one proposed rule, such as the proposed Land and Resource Management Planning Rule, which already addresses requirements to consider some of the same issues which the USFS is attempting to address in the other proposed rules. (State Agency, Saint Paul, MN - #43999.72100)

WITH MULTIPLE OTHER RULES

The Forest Service has arbitrarily divided a set of inextricably intertwined policies concerning the same lands (currently unroaded lands in the National Forest System) and the same subject matter (providing future direction regarding road construction in such unroaded areas) into three separate proposals for separate analysis. The three interrelated and simultaneously-pending proposals are: (1) proposed rules for roadless areas of the National Forest System (65 Fed. Reg. 30276 (May 10, 2000)); (2) proposed rules and Forest Service Manual provisions on road management and road transportation policy in the same roadless areas (65 Fed. Reg. 11676 (March 3, 2000)); and (3) proposed rules on forest planning in the National Forest system (64 Fed. Reg. 654074 (Oct. 9, 1999)). (Timber Association, Eugene, OR - #15879.72100)

THE POLICIES ON ROADS IN UNROADED AREAS HAVE BEEN ARBITRARILY DIVIDED INTO THREE PROPOSALS - In one proposal, the Forest Service has proposed to maintain in perpetuity the roadless character of all inventoried roadless areas, 65 fed. Reg. 30276, 30288 (May 10, 2000), proposed 36 C.F.R. [section] 294.12. If that rulemaking had stopped there, it would have addressed a distinct subject. But the roadless area rulemaking goes on to require additional evaluations during the revision of each land use plan for UNINVENTORIED unroaded areas, 65 Fed. Reg. 30288, proposed [section] 294.13. If all three proposals are adopted, the regulations relevant to making decisions on uninventoried unroaded areas would be strewn across three different parts of the C.F.R., plus several sections of the Forest Service Manual. This would create chaos and confusion for those Forest Service employees and those members of the public who must try to figure out what studies are required, and what the decision making standards are, to construct a road in a currently-unroaded area in a national forest.
One logical question is: With respect to analyzing road and roadless issues during revision of forest plans, is all the relevant material in the forest planning regulations? The answer would be NO. If these proposals are adopted, the Forest Service and public must consult three different parts of the C.F.R., plus the Forest Service Manual, to understand what types of evaluations of uninventoried unroaded areas will be conducted during revision of a forest plan. (Timber Association, Medford, OR 13658.50000)

Public Concern: The Forest Service should evaluate the current forest plan direction for 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 [forest plan directions for each specific roadless area] identified in this Roadless Area Conservation Proposed Rulemaking change. (Timber Company, Montrose, CO - #13091.70000)

8.2 Cumulative Effects

This section presents public concerns over the cumulative effects of the proposed rule. Section 8.2.1 addresses concerns over the cumulative effects of the proposed rule in combination with other policies, plans, and existing environmental legislation. Section 8.2.2 addresses concerns over the adequacy of the cumulative effects analysis in the Draft EIS.

8.2.1 Cumulative Effects with Policies, Plans, and Programs

Many respondents believe the Forest Service should conduct a comprehensive cumulative effects analysis of the proposed rule with other policies, plans, and existing environmental legislation. In particular, respondents note the need for such an analysis with respect to a particular initiative of concern to them, such as the Road Management Rule or the Unified Federal Policy for Ensuring a Watershed Approach to Federal Land and Resource Management. Most who comment on this topic, however, assert the need for a cumulative effects analysis for the proposed rule in combination with a list of multiple other initiatives. As one writer puts it, “The cumulative effect of the proposed forest planning regulations, road management policy and roadless area conservation rule should be analyzed, revealing to the American people what the cumulative impacts of the major changes in policy mean.” Other writers mention the Sierra Nevada Framework, the Clean Water Action Plan, and regional wilderness plans.

A number of writers also point to the need for a cumulative effects analysis of the proposed rule with existing environmental legislation, such as the Threatened and Endangered Species Act and

the Clean Water Act. Additionally, some respondents wonder what the impacts of the proposed rule will be "with other withdrawals of National Forest lands including those for National Monuments, wilderness areas, wild and scenic river areas, Forest Service natural areas and others."

Finally, a number of writers believe that site-specific analyses should be conducted for each roadless area with respect to various factors. Because these concerns are identified elsewhere in this document according to the resource at issue, they are not repeated here. It should be noted, however, that requests for site-specific analyses are common and some writers list a number of specific areas for which they would like to see such analyses conducted.

Public Concern: The Forest Service should analyze the cumulative effect of the proposed rule with concurrent proposed rulemaking initiatives and current environmental legislation.

WITH THE ROAD MANAGEMENT RULE

The cumulative intent of these rules is not being clearly disclosed to the public by going about things in this fashion. The cumulative effects analysis in the DEIS on pages 3-240 to 3-243 is very inadequate. The analysis underplays the effects of the emphasis placed on road closures, prohibitions on road building, new requirements for analysis and special emphasis on the maintenance of roadless characteristics in the road rule and the cumulative effect this will have when coupled with the roadless rule. (Individual, Kalispell, MT - #30418.70000)

Table 3-1 on page 3-3 identifies 5.827 million acres of inventoried roadless areas in Montana. The cumulative impact of the additional "unroaded" acres, which (in accordance with Federal Register, Vol. 65, No. 43, Friday, March 3, 2000, Notices, page 11691, item 2(a) would require "a compelling need to propose construction/reconstruction of roads in the following roadless and 'unroaded' areas," was never analyzed nor even identified. (State Elected Official, Helena, MT - #19289.72220)

WITH THE UNIFIED FEDERAL POLICY FOR ENSURING A WATERSHED APPROACH TO FEDERAL LAND AND RESOURCE MANAGEMENT

The Unified Federal Policy for Ensuring a Watershed Approach to Federal Land and Resource Management proposed policy in the February 22, 2000, Federal Register is commendable. It announces the intention of the Department of Agriculture and the Interior to develop a unified Federal policy for watershed management in consultation with other Federal agencies, States, Tribes and interested stockholders. As the proposed roadless rule deals directly with public watersheds. I see relationships coming forth out of the roadless rulemaking proposal presenting problems, particularly in restoring watersheds without access and expanding collaboration among States, Tribes and interested stockholders. (Individual, Annabella, UT - #43212.72200)

WITH BOTH CONCURRENT NATIONAL RULEMAKINGS

The cumulative effects analysis is completely inadequate. Before a final EIS is issued, the cumulative effect of the proposed forest planning regulations, road management policy and roadless area conservation rule should be analyzed in further detail, revealing to the American people what the cumulative impacts of these major changes in policy truly are, including economic effects. A significant problem is the failure to provide the public with a basis for evaluating the impact of the proposal. The data, scientific methods, and other information relied upon have not been adequately identified -- maps and other necessary documents to help analyze the proposal are still not available and/or adequate. The level of detail with regard to specific roadless areas is obviously missing. (Timber Company or Association, Coeur D'Alene, ID - #15899.72100)

Management of roadless areas in the National Forest System is addressed in three interrelated and simultaneous Forest Service proposals: roadless area protection (65 Fed. Reg. 30276), road management and road transportation policy (65 Fed. Reg. 11676), and forest planning (64 Fed. Reg. 54074). These three rulemakings concern the same National Forest System lands and the same subject matter (providing future direction on roads in the National Forest System). The Forest Service has admitted this proposed roadless area rule, together with these other proposed rules, might have a cumulative impact in final form. As a result, the impacts of these interrelated proposals cannot be considered in isolation in separate NEPA documents; the cumulative impacts must be assessed. (Individual, Anchorage, AK - #52495.72200)

WITH MULTIPLE OTHER INITIATIVES

Prepare a report of the cumulative effects of this roadless proposal when combined with the Sierra Nevada Forest Plan Amendment, Transportation system regulations, planning regulations, implementation of the Clean Water Action Plan, the Strategic Plan 2000 and any other regulations to be advanced in 2000. (Business, Sacramento, CA - #2831.72100)

The cumulative impact would be unacceptable under the cloud of these nine (9) major forest revisions currently under consideration by your agency, as well as the Environmental Protection Agency, and the National Marine Fisheries Service. As you know, since late 1999 the Forest Service has released a total of seven major nationwide and regional regulatory proposals - which individually, each would dramatically alter Oregon national forest management. Additionally, two other major federal rulemakings were concurrently proposed to regulate Oregon forest lands - the EPA draft water quality TMDL/NPDES forestry rules, and the NMFS draft 4(d) salmon rules. (Timber Company, Salem, OR - #15915.72200)

The DEIS for these regulations should be combined with other environmental documents on the roadless proposal, FEMAT option 9 and the Aquatic Conservation Strategy, clean water action plan regulations, planning regulations, strategic plan 2000 regulations and the Sierra Nevada Framework for Conservation and Collaboration. The agency is failing in its responsibility to consider cumulative impacts of these initiatives to its charge of multiple use. The cumulative effect seems to be that the entire mission of the forest service is being deliberately changed from the production of goods and services for use by people and adjacent communities to one that limits or excludes all human use and access to our national forests. (Business, Yreka, CA - #43494.72100)

WITH EXISTING ENVIRONMENTAL LEGISLATION

The Roadless Initiative is yet another way to limit timber harvest in the National Forests. The DEIS does not report the cumulative effect of the Roadless Initiative in combination with other environmental legislation in regards to limiting timber harvest in the national forests. The Threatened and Endangered Species Act, the Clean Water Act, Wilderness areas, and land within wild and scenic rivers have already limited timber harvest in the national forests. The Roadless Initiative adds yet another 3% of the Chequamegon-Nicolet National Forests into the limited timber harvest areas. Piecemeal legislation and government action is locking up the national forests. This action negatively affects both the health of the national forests and the economic conditions of the surrounding areas. (Individual, Stratford, WI - #11336.93300)

I oppose the Clinton Roadless Plan for the following reasons: The cumulative effects analysis (3-240) is extremely inadequate. No mention of effects on Air, Water, and Endangered Species Acts. (Individual, Plains, MT - #13665.70000)

WITH PAST WITHDRAWALS OF NATIONAL FOREST SYSTEM LANDS FOR ENVIRONMENTAL PROTECTION

In addition to the inadequate consideration of the cumulative impacts of the various Forest Service pending environmental initiatives, there is no recognition of the cumulative impact of the proposed roadless program with other withdrawals of National Forest lands including those for National Monuments, wilderness areas, wild and scenic river areas, Forest Service natural areas and others. Over the past few decades, countless acres of federal lands have already been dedicated to special categories for environmental preservation. (Mining Association, Washington, DC - #52224.71110)

Public Concern: The Forest Service should address the site specific cumulative effects of concurrent rulemaking initiatives on individual national forests.

The cumulative impact of the proposed roadless rule, together with a number of other Forest Service proposals impacting our local forests, has not been sufficiently addressed. The Road Maintenance Policy, the Sierra Nevada Framework, the Roadless Initiative, regional wilderness plans, and other federal plans, policies, and rules will all have a yet to be determined cumulative impact on our local forests. (County Elected Official, No Address - #17289.72100)

8.2.2 Adequacy of the Cumulative Effects Analysis in the Draft EIS

A number of writers claim that the comparison of cumulative effects by alternative presented in the Draft EIS is inadequate. According to one writer, "The Cumulative Effects section is simply a reiteration of the direct and indirect effects. Both are so general that they are little help to the reader in evaluating alternatives. Mitigation measures are not even discussed." Notes another, "There is nothing at all about other actions (public or private) and how those land practices interact with this proposal." Others charge that the discussion of the differing effects of Alternatives 2, 3, and 4 has been wholly skipped over. "That the Forest Service sees no difference," remarks one respondent, "between an active cutting program and a no-cut alternative boggles the mind and challenges one's sensibility."

Finally, while there is abundant concern over the need for more adequate cumulative effects analyses, some comment that such analyses should not be incorporated into baseline data. Notes one individual, "Cumulative actions are often inappropriately integrated into the baseline description in an attempt to mask their impact and to minimize the incremental impacts related to this proposal."

Public Concern: The Forest Service should prepare a meaningful cumulative effects analysis for the Final EIS.

The cumulative effects ignores the biology and ecology of forests and is inadequate. Not enough information is presented to the reader to analyze the true consequences of the proposals for any area. And, that's the best I can say! (Individual, No Address - #8442.70000)

This entire section [ecological factors] is so biased against roads and timber harvesting that one cannot begin to identify all the discrepancies. The entire section focuses on the negative aspects of roads and timber harvest and rarely addresses the benefit of these activities, such as increased water for municipal use, irrigation, providing access for water related recreational activities, access for fire suppression activities and fuel management, vegetative management, etc.
Cumulative effects are rarely quantified. Subjective conclusions are provided, such as small increments, most benefits, lowers the likelihood, increased incidence, slightly increasing, sharp reductions, minimizing, measurable, lower risk, etc. that are essentially meaningless. What do these mean? The Forest Service cannot make a reasonable decision on effects using these subjective conclusions and determine what effects they may have within their jurisdictions. This provides even more reason for these decisions to be made at the local level where cumulative effects can be quantified.
RELIEF: The Forest Service must completely rewrite these sections in an objective manner, provide a specific quantitative analysis of impacts, and replace subjective evaluations with quantitative evidence.
(County Elected Officials, Kalispell, MT - #16102.70000)

DISTINGUISH DIRECT AND INDIRECT EFFECTS FROM CUMULATIVE EFFECTS

Comments: Page 3-35, third and fourth paragraphs-- The Cumulative Effects section is simply a reiteration of the direct and indirect effects. Both are so general that they are little help to the reader in evaluating alternatives. Mitigation measures are not even discussed. Relief: The Forest Service must address real cumulative effects and not reiterate the direct and indirect effects of the alternatives. (County Elected Official, Worland, WY - #16185.83210)

The EA very briefly looked at some things called "cumulative impacts" but these were actually indirect impacts and nothing but "cookbook" analysis at that. There is nothing at all about other actions (public or private) and how those land practices interact with this proposal. "Cumulative impacts" are not the things that happen later or some distance from this proposal, such as downstream sedimentation 5 years from now. Those are called "indirect impacts," which NEPA also requires the agency to consider. However, the Forest Service cannot forego its legally mandated consideration of cumulative impacts by mislabeling indirect impacts as "cumulative." (Environmental/Preservation Organization, Plymouth, MN - #51067.70000)

COMPARISON OF THE ALTERNATIVES.

"Given that the changes in timber harvest between the action alternatives are not substantial, the cumulative effects of Alternatives 2, 3, and 4 would be substantially the same" (DEIS p. 3-87). While this statement emphasizes the need for other alternatives, it also illustrates the lack of analysis concerning cumulative effects. "[Alternative 3] Cumulative Effects: Effects of this alternative provide incremental benefits when compared to those gained in Alternative 2...Alternative 4 Cumulative Effects: Effects would not be substantially different than those of Alternative 3 (DEIS p 3-26). That the Forest Service sees no difference between an active cutting program and a no-cut alternative boggles the mind and challenges one's sensibility. And yet, this is a common refrain whether the Forest Service is discussing the impacts to drinking water, wildlife, air quality, etc. The same language is used time and time again. (Environmental/Preservation Organization, Plymouth, MN - #51067.93610)

Public Concern: The Forest Service should avoid incorporating cumulative effects into baseline data.

Cumulative actions are often inappropriately integrated into the baseline description in an attempt to mask their impact and to minimize the incremental impacts related to this proposal. (State Elected Official, Fallon, NV - #17290.70000)

Chapter 9 Technical and Editorial Concerns

This chapter covers the public comment concerning perceived technical and editorial shortcomings in the proposed rule. These disparate comments are divided into seven sections: 9.1 General Comments; 9.2 Clarity of Terminology; 9.3 Contradictory Concepts; 9.4 Identification of Specific Terms; and Concepts; 9.5 Requested Changes; 9.6 Definitions; and 9.7 Adequacy of Maps, Tables, and Appendices.

9.1 General Comments

The clarity and size of the proposed rule elicits many diverse comments. Numerous citizens believe that the Forest Service should make its Environmental Impact Statements shorter and less complicated. Eliminating repetition in the Draft EIS is one suggestion offered to accomplish this goal. Another respondent, believing the proposed rule doesn't go far enough in protecting national forests, suggests that the Forest Service should begin using the term "National Tree Farms" to describe Forest System Lands. Decrying the lack of clarity of the overall proposal, one person writes, "I think it [the proposed rule] is an extreme response to a problem that has not even been clearly explained or described."

Public Concern: The Forest Service should make its Environmental Impact Statements shorter and less complicated.

Please do not send me any EIS volumes. They are too long and too complicated to read and understand. (Individual, Longview, WA - #803.30000)

I can't understand why the government has adopted the passive voice as their official language. A great deal could be cleared up if "legalese" could be replaced with clear, concise, writing. (Individual, Olympia, WA - #538.31100)

Public Concern: The Forest Service should eliminate repetition in the Draft EIS.

In my years of reading Technical Specifications and Contracts for DOD contractors this document ranks as one of the worst written documents I have seen. There are large portions of the document that are unnecessarily repeated verbatim several times. This appears to be done for no purpose other than to confuse the reader and make analyzing the document problematic. (Recreational Organization, Huntsville, AL - #10130.31000)

Public Concern: The Forest Service should use clear and honest language.

If your agency is not going to protect our forests, then please at least let the public know exactly and precisely what the public owns: National Tree Farms, not National Forests. This simple change in wording would go far toward exhibiting an honest approach with the public. (Individual, Florence, OR - #3618.42000)

Public Concern: The proposed rule is vague and short on reasoning.

I think it is an extreme response to a problem that has not even been clearly explained or described. Why is this being done??? Why not manage the problem versus eliminate the usage??? Again, this proposal is way too vague in description and short on reasoning. (Individual, No Address - #2707.31100)

9.2 Clarity of Terminology

Numerous terms used throughout the Draft EIS need to be modified or clarified according to various respondents. One respondent would like the Forest Service to make a distinction between conservation and preservation. The phrase "the roaded portion of the inventoried roadless area" prompts one citizen to question why the area is called "roadless" when it contains a "roaded portion." Another individual wonders whether all roadless areas will be protected when the Draft EIS contains the statement that the proposed rule would "prohibit construction and reconstruction in *most* inventoried roadless areas."

Citing another potentially confusing term, a constituent requests that the Forest Service clarify the phrasing of the proposed rule's alternatives. The No Action Alternative may be misinterpreted by the public as a "No Logging" Alternative, according to this respondent. Tangentially, one citizen exhorts the Forest Service to strengthen the language of the proposed rule by removing the word "whether" from all the alternatives in the Draft EIS. Some respondents would like the Forest Service to evaluate the use of the word "natural" in describing roadless areas.

Public Concern: The Forest Service should clearly distinguish the difference between conservation and preservation.

The document repeatedly references the "Conservation" of roadless areas. In reality, the discussions in all chapters refer to protection and preservation of roadless areas. The proposal, alternatives, and discussion all lead to the concept of "preservation" and not "conservation." Conservation is more appropriately defined as the "wise use" of resources--not withdrawing them from use. The Summary, Page S-2, defines the importance of roadless areas for watershed and ecosystem health only. The resources in roadless areas must be identified as being important to community health in regard to stability, dependency, jobs, income, payments to states, etc. The proposed action leaves little discretion for management of resources in roadless areas. (County Elected Official, Sheridan, WY - #51045.31000)

Public Concern: The Forest Service should clarify the use of the phrase, "the roaded portion of the inventoried roadless area."

"The roaded portion of the inventoried roadless area?" Give me a break….why call it roadless if it is not physically? Those trails are often to the same standard as an mtc. Level 2 road. (Individual, No Address - #1602.32000)

Public Concern: The Forest Service should clarify the statement in the booklet of questions and answers that this proposal would "prohibit construction and reconstruction in most inventoried roadless areas."

From the Questions and Answers booklet, the proposed rule: Page 9--this proposal will "prohibit construction and reconstruction in most inventoried roadless areas." So it really does not cover all areas. (Individual, No Address - #1203.64150)

Public Concern: The Forest Service should clarify the phrasing of the proposed rule's alternatives.

After reading the information on your web page, I have the following comments on your specific proposals and alternatives. First, your phrasing of the alternatives to your preferred plan was unclear at several points, perhaps leading to confusion among the public. I presume that your "Do Nothing" alternative means to not change policy; however, some may be misled into thinking that it means "Do Not Log" - I hope that you take this into account when reviewing public comments. (Individual, Mystic, CT - #8132.31000)

Public Concern: The Forest Service should remove the word "whether" from all the alternatives in the Draft EIS.

I applaud the effort to let local land managers have authority in evaluating roadless area characteristics. However, I believe that the word "whether" should be removed from all alternatives. For example, "…decide whether and how to protect them…" should be changed to "…decide how to protect them." (Individual, Pleasant Ridge, MI - #2235.31100)

Public Concern: The Forest Service should evaluate the use of the word "natural" in describing roadless areas.

To describe such areas as "natural," in the sense that they are uninfluenced by modern civilization, is factually incorrect. Roadless areas do continue to produce higher quality water than most roaded areas, but from a vegetation or wildlife viewpoint they have been completely transformed. Though they may be "wild," most roadless areas are far from natural. (University Society, Arlington, VA - #43983.31100)

9.3 Contradictory Concepts

Many people who have perused the Draft EIS believe it contains certain statements and concepts that are contradicted elsewhere in the document. Citing the section on decommissioning roads, one elected official notes that these new unroaded areas will be evaluated for roadless characteristics and values. This public servant points out that elsewhere in the document it is stated that "the proposed prohibition on road construction would reduce roadless caused irreversible and irretrievable commitments to dispersed recreation activities in roadless areas." If these commitments are irreversible, this official wonders, then how can the Forest Service evaluate these areas for roadless values? This person would like the Forest Service to address this contradiction.

The Forest Service should reconcile the difference between the issues identified in the abstract and those cited throughout the rest of the Draft EIS, according to another elected official. Others believe that the Forest Service should clarify the difference between responses and comments. Citing the 360,000 responses and 119,000 public comments received by the Forest Service, one person posits, "the Forest Service needs to either fix the number or define the difference between 'responses' and 'comments.'"

Some respondents cite the contradiction between the proposed rule's exception to no new roads granted by the 1872 mining law and the summary table's statement that exploration costs would increase because no roads would be allowed. These people would like to know whether roads will be allowed for the purpose of mineral exploration. Additionally, one Nevada resident believes the Civil Justice Reform Act section of the Draft EIS "appears to be a blanket policy whereby your regulations will usurp our rights and laws at all levels." This person believes the paragraph should be reworded so there is no question that the USFS intends to comply with other laws. Others believe the Forest Service should address inconsistent mileage estimates of road construction in the Draft EIS. A timber association proposes discrepancies between the Interior Columbia Basin Ecosystem Management Project's estimate of impaired streams and those contained in the Draft EIS be corrected. The association believes initiatives suffer from a general lack of coordination and inconsistent data and should be cleared up in the Draft EIS to properly disclose the effects of the rule.

Public Concern: The Forest Service should address contradictions in the cumulative effects analysis.

P72 Cumulative Effects Third Paragraph. It is premature to state that physical and biological resources would benefit, especially since this statement appears to contradict the previous paragraph. P72 Cumulative Effects Third Paragraph "Adverse recreational and social and economic impacts could occur as a result of decreased motorized recreational opportunities..." (Individual, Beaumont, TX - #50613.31300)

Public Concern: The Forest Service should address contradictions in the Draft EIS regarding the evaluation of roadless characteristics and values.

In one statement the Forest Service says that "As roads are decommissioned, the resulting unroaded areas will be evaluated for roadless characteristics and values." In another section, they state that "the proposed prohibition on road construction would reduce roadless caused irreversible and irretrievable commitments to dispersed recreation activities in roadless areas." You can't have it both ways--Irreversible means you can't go back to the way it was. The first statement severely contradicts the second statement which is a legal conclusion of the agency. (County Elected Official, Elko, NV - #17274.31300)

Public Concern: The Forest Service should reconcile the differences between the issues identified in the abstract and those cited throughout the rest of the Draft EIS.

Page 1-6, issues discussion--The issues identified (public access, identification of unroaded areas, exemptions, local involvement, etc.) are inconsistent and extremely different from the opening-page Abstract (protecting clean water, biological diversity, dispersed recreation, wildlife habitat, etc.). Relief: The Forest Service must clarify why the issues are different between the two sections of the document. (County Elected Official, Worland, WY - #16185.33100)

Public Concern: The Forest Service should clarify the difference between responses and comments.

Page 1-5, 4th paragraph--States that "...the Forest Service received over 360,000 responses…" On the previous page it states that "The agency received approximately 119,000 public comments..." That's a difference of 222,000 responses or comments. Relief: The Forest Service needs to either fix the number or define the difference between "responses" and "comments." (County Elected Official, Worland, WY - #16185.44410)

Public Concern: The Forest Service should reconcile contradictory statements in the proposed rule regarding the right to build mining exploration roads.

The proposed rule says that certain limited exceptions to no new roads would include rights granted by the 1872 mining law. In the summary tables, however, it is stated that exploration costs would increase because no roads would be allowed. Without the right to build exploration roads, mining is essentially banned. Additional language within the document is also contradictory. (Individual, Elko, NV - #8087.93500)

Public Concern: The Forest Service should reword the Civil Justice Reform Act section of the Draft EIS.

Another item of real concern, in line with the above, can be found in your Civil Justice Reform Act on page A-24. This appears to be a blanket policy whereby your regulations will usurp our rights and laws at all levels. I'm sorry, but America is still a republic made up of 50 self-governing states with a binding Constitution. I don't believe it is or should be the intent of regulatory policy to circumvent established law. This paragraph should be reworded so there is no question that the USFS intends to stay within our laws. (Individual, Ely, NV - #10563.51000)

Public Concern: The Forest Service should address inconsistent estimates of road construction in the Draft EIS.

Pages 3-16 and 3-17 have inconsistent estimates of the amount of road construction in inventoried areas under the "no action" alternative--300 miles on page 3-16 and 1,444 miles on page 3-17. Please clarify in the FEIS. (Environmental/Preservation Organization, Eugene, OR - #43410.31200)

FIVE YEAR ESTIMATES FOR ROAD CONSTRUCTION AND RECONSTRUCTION IN INVENTORIED ROADLESS AREAS

Also, a correction may be warranted on page 3-16 where prohibition alternatives are discussed. Under Alternative 1 on page 3-16, the DEIS states that approximately 300 MILES of road construction and reconstruction is planned in inventoried roadless areas over the next five years. On page 3-17, a large figure, 1,444 MILES, is used to describe the same activity. Subsequent tables 3-4 and 3-5 support the larger figure. (State Agency, Olympia, WA - #17285.33300)

Public Concern: The Forest Service should clarify the discrepancy between the Interior Columbia Basin Ecosystem Management Project's estimate of impaired streams and that contained in the Draft EIS.

The ICBEMP project states that eight percent of stream miles within the project area are water quality limited as defined by the Clean Water Act. And yet, the roadless proposal map on page 3-30 of the DEIS describes a much different water quality situation. Most of the ICBEMP area is shown as having 11 to 25 or greater percent impairment. Of course, all of this seems inconsistent with a recent report we have produced with the National Association of State Foresters, which demonstrates that water quality impairments due to forestry are drastically overestimated. Again, these initiatives suffer from a general lack of coordination and inconsistent data. Inconsistencies must be cleared up if the DEIS is to properly disclose the effects of the rule. (Timber Association, No Address - #52501.33300)

9.4 Identification of Specific Terms and Concepts

Several terms and concepts, while comprehensible, are not specifically delineated to the satisfaction of many readers. For example, the Draft EIS's effects analysis should specify what types of uses will be prohibited in uninventoried roadless areas and other unroaded areas, according to one respondent. Another believes that the Forest Service should specify whether the word "treaty," as used in the Draft EIS, refers to agreements with Native American Tribes or with international bodies.

Other concepts that need to be specifically identified, according to various citizens, are "controversial issues," "threats to wilderness character," "characteristics," and "A-7 special designations." However, one respondent, citing several undefined phrases on page S-14 of the Draft EIS, does not seek clarification but rather requests that the Forest Service delete these statements outright. One respondent believes that there are other categories that the Forest Service should consider under the Recreation Opportunity Spectrum.

Public Concern: The effects analysis in the Draft EIS should specify what types of uses will be prohibited in uninventoried roadless areas and other unroaded areas.

Prohibited uses in uninventoried roadless areas and other unroaded areas are not fully outlined in the effects analysis on 3-223 of the DEIS. (Individual, Kalispell, MT - #9973.70000)

Public Concern: The Forest Service should specify the referent of the word "treaty" in the Draft EIS.

Please specify when you use the word treaty whether you are referring to native American treaties or U.N. treaties such as the 1992 Biodiversity Treaty. (Individual, Sovey, MI - #670.31100)

Public Concern: The Forest Service should identify the controversial issues mentioned in the Draft EIS.

Quoting from the document, it was further stated that "the controversy surrounding roadless area management" would make the transaction costs high. Please explain what are the controversial issues surrounding the management of the roadless rule? Your EIS and the Summary did not offer any information on the subject or nature of what was the controversy. (Individual, Klamath Falls, OR - #10231.31100)

Public Concern: The Forest Service should specifically identify the "threats to wilderness character" mentioned on page 3-138 of the Draft EIS.

Page 3-138, second paragraph-- The discussion references threats to wilderness character. What are they? They are not specifically identified but simply identified as threats. Relief: The Forest Service must identify and disclose what these effects are. (County Elected Officials, Worland, WY - #16185.90240)

Public Concern: The Forest Service should identify A-7 special designations.

A-7 "Special designations" - what might these be? Their purpose? Will they be developed to complement other protected areas and enhance biodiversity protection? A spectrum of land use designations are needed to truly preserve biodiversity. (Individual, Leavenworth, WA - #15897.83400)

Public Concern: The Forest Service should delete undefined phrases on page S-14 of the Draft EIS.

Page S-14; In smaller unroaded areas, the local manager would determine if he would be reasonably able to conserve its roadless characteristics. Since the definition of "sensitive species that need their habitat protected," "sensitive species that are different from threatened, endangered, and proposed candidate species with their habitat threatened," are not defined, delete them. Delete "Landscape character and scenic integrity". (Individual, Twain Harte, CA - #1632.32000)

Public Concern: The Interdisciplinary Team should consider addressing the effects of the proposed rule on subcategories of the Recreation Opportunity Spectrum

There are additional categories and subcategories under the ROS classification that may be appropriate for consideration during the review of roadless and unroaded areas. (Environmental/Preservation Organization, Asheville, NC - #43412.91200)

9.5 Requested Changes

Various individuals, groups, and government agencies offer specific Draft EIS wording and numerical changes for the Forest Service's consideration. Such changes are offered to eliminate subjectivity, to be consistent with the language of the action alternatives, to reconcile perceived contradictions, or to provide better detail, according to these respondents. Several citizens seek clarity regarding information found in the Draft EIS, in tables and also on specific pages. Corrections to spelling and word usage in the text are also described here.

One individual requests that stock use be added to the list of allowed dispersed recreation activities. Respondents also state concern over appendices, suggesting that Appendix A be withdrawn from the DEIS. Suggestions for changes to definitions can be found in Section 9.6.

Public Concern: The terms "classified" and "unclassified" roads should be changed to "maintained" and "unmaintained."

It is also very misleading to call roads "classified," and "unclassified." They should be called as they are, maintained, and unmaintained roads. (Wise Use Organization, Big Pine, CA - #6694.32000)

Public Concern: The Forest Service should replace the phrase "ensure consideration" with "ensure compliance with the rule" in item 2 of the proposed rule.

In item #2 of the proposed rule, I suggest replacing the phrase "ensure consideration" with "ensure compliance with the rule." This helps eliminate subjectivity. (Individual, No Address - #3557.31100)

Public Concern: The Forest Service should replace the wording of "most restrictive" with "most protective" when describing Alternative 4.

Sometimes the DEIS says that alternative 4 is "most restrictive." This is accurate but casts this alternative in a negative light. It would be better to say "most protective." (Environmental/Preservation Organization, Eugene, OR - #43410.31100)

Public Concern: The Forest Service should change the statement "the proposed action would prohibit road construction and reconstruction in inventoried roadless areas" to "prohibit road construction and reconstruction in unroaded portions of inventoried roadless areas" in the Draft EIS.

The DEIS abstract states that the proposed action would prohibit road construction and reconstruction in inventoried roadless areas. Based on the language defining the action alternatives, however, we assume this is a misstatement, and should read "prohibit road construction and reconstruction in unroaded portions of inventoried roadless areas…" to be consistent with the language of the action alternatives and the intent of this initiative. (State Agency, Santa Fe, NM - #17300.31100)

Public Concern: The Forest Service should change the statement "no roads or trails would be closed because of the prohibitions" to "no classified roads would be closed because of these prohibitions" on page S-1 of the Draft EIS.

Another major contradiction occurs on page S-1, which states that no roads or trails would be closed because of the prohibitions. This statement should be changed to state that no "classified" roads would be closed because of these prohibitions. (State Agency, Santa Fe, NM - #17300.31100)

Public Concern: The Forest Service should change the phrase "of considerable length" to "of meaningful length" in Section 294.13(B)(2) of the proposed rule.

Section 294.13(B)(2) also calls for consideration of unroaded areas with a common boundary "of considerable length" with inventoried roadless areas, wild and scenic rivers, etc. Rather than of "considerable" length, it appears that a better description would be of "meaningful" length. Even a narrow common boundary may be critical where it is along a migration corridor or near a stream. (State Elected Official, Salem, OR - #18661.31100)

Public Concern: The Forest Service should combine the discussions of timber harvest on pages 3-112 and 3-182.

Why is the discussion of timber harvest split into two sections 70 pages apart starting on pages 3-112 and 3-182. (Environmental/Preservation Organization, Eugene, OR - #43410.31200)

Public Concern: The Forest Service should use the terms "scheduled" and "unscheduled" harvest when discussing the alternatives.

In discussing the alternatives that relate to "commercial timber harvest" we suggest you reference the term "scheduled" harvest to distinguish between "unscheduled" harvest and other activities. (County Agency, No Address - #16087.32100)

Public Concern: The Forest Service should modify the language of 36 CFR.

294.12

DEFINITION OF "UNROADED PORTION OF INVENTORIED ROADLESS AREA' MUST BE AMMENDED The definition of "unroaded portion of an inventoried roadless area" should be changed to read: "a portion of an inventoried roadless area in which no classified road has been constructed since the area was inventoried." EXCLUSION IN SECTION (294.12(b)(3) MUST BE REVISED. Section 294.12(b)(3) should be revised to read: "A road is needed pursuant to reserved or outstanding rights or as permitted by statute, treaty or other authorities: or". ADDITIONAL EXCLUSION MUST BE ADDED TO SECTION 294.12(b). The following item should be inserted after Section 294.12(b)(4): "(5) A road is needed to carry out the multiple uses provided for in the authorities cited for these regulations." (Mining Organization, Reno, NV - #15907.31100)

294.13

We therefore ask the USFS to include the following language (or comparable language) in Section 294.13 of the final Roadless Area Conservation Rule:
36 CFR 294.13 (Consideration of roadless area conservation during forest plan revision AND IMPLEMENTATION).
294.13(b)(3): At any time, a person may petition the Forest Service to classify lands in the NFS as "roadless" or "unroaded" under these regulations. Any such petition must be submitted to the Supervisor(s) of the NFS units in which the petitioned lands reside. The petition must include, at the minimum, the following information:
(i) The name and address of the petitioner,
(ii) A detailed map showing the boundaries of the petitioned area,
(iii) A description of the area that informs the responsible official of the petitioned area's important characteristics, such as those listed in Section 294.13(a) of these regulations, and
(iv) A map or maps showing any "roadless" or "unroaded" area boundaries identified in previous inventories that may overlap with or otherwise have relevance to the petitioned area, and The petition should also include, when appropriate, photographs or other supporting documentation to show that features (e.g., unmaintained roads) previously believed to disqualify the petitioned area from "roadless" or "unroaded" status may not disqualify the area for such status.

294.13(b)(4): When a responsible Forest Service official receives a petition submitted pursuant to Section 294.13(b)(3) of this rule, that official shall review the petition and supporting materials and make a determination on the "roadless" or "unroaded" status of the area. To assist the determination, the agency official may elect to visit the petitioned area or seek further information from the petitioner. Within 160 days of receiving a petition, the official shall then issue a written response to the petition explaining the official's determination. The response shall either grant the petition in whole, grant the petition in part, or deny the petition.
294.13(b)(5): Any determination on a petition submitted pursuant to Section 294.13(b)(3) of these rules shall constitute a finding of fact concerning the on-the-ground conditions of an area. As such, the determination on a petition shall not commit the agency to undertake any ground-disturbing activities that would have an adverse environmental impact or otherwise be subject to assessment under the National Environmental Policy Act or its implementing regulations. (Environmental/Preservation Organization, Laramie, WY - #43697.31000)

RESPONSIBLE OFFICER MUST CONSIDER COMMODITY RESOURCE SUPPLY POTENTIAL DURING FOREST PLAN REVISION. The following item should be inserted after Section 294.13(a)(9): "(10) Commodity resource supply potential" to ensure that the responsible official takes into account all potential uses of the land in question. (Mining Organization, Reno, NV - #15907.31100)

Public Concern: The Forest Service should address the grammar and clarity of paragraph 294.13(a) in the Draft EIS.

The language under proposed par. 294.13 (a) does not appear grammatically correct and is not clear. How, for example, is soil a characteristic in itself? How can a "responsible official" evaluate just soil? Or "water" or "air"? What data and information will be needed in order to know, for example, the nature of "diversity of plant and animal communities?" And "habitat..."? And "landscape character and scenic integrity"? These "characteristics" also have to be evaluated for unroaded areas that may have non-classified roads; how can this be understood by responsible officials and done in a reasonable manner? This language does not explain exactly what is to be evaluated in the consideration of quality and importance of the "characteristics" ...This language does not follow proper syntax and semantics; it is ambiguous, elusive and impossible to accomplish with any degree of legal certainty. (County Elected Official, Yreka, CA - #13551.31100)

Public Concern: The Forest Service should use a hierarchical numbering system for the pages of Chapter 3.

Chapter 3 is long and would be improved by a hierarchical numbering system. (Individual, Oak Ridge, TN - #53014.33000)

Public Concern: The Final EIS should replace the term "dispersed recreation" with the more appropriate term "recreation setting."

Primitive, semi-primitive non-motorized, and semi-primitive motorized classes of dispersed recreation: Comment: Within the recreation opportunity spectrum, "Recreation Setting" is the appropriate term instead of "Dispersed Recreation." (Environmental/Preservation Organization, Asheville, NC - #43412.91200)

Public Concern: The Forest Service should clarify page S-36 of the Draft EIS.

S-36 Paragraph five is confusing and roughly worded. This needs to be put in plain language for the public. (Individual, Leavenworth, WA - #15987.31200)

Public Concern: The Forest Service should change "eliminating" to "eliminate" in the last paragraph of page 3-31.

3-31 Last paragraph. "...would completely ELIMINATING timber offering." Grammatical error. (Individual, Leavenworth, WA - #15987.31200)

Public Concern: The Forest Service should clarify the heading of table 3-9 on page 3-51.

3-51 Table 3-9. Heading is confusing and should be clarified. The last column heading needs a comma after "wilderness," or more work if that is not what is being expressed. (Individual, Leavenworth, WA - #15987.31200)

Public Concern: The Forest Service should reword "The largest would increase occurs in…" in the third paragraph of page 3-53.

3-53 Paragraph three. "The largest WOULD INCREASE occurs in the..." Reword. (Individual, Leavenworth, WA - #15987.31200)

Public Concern: The Forest Service should reword "precise estimates" on page 3-57 of the Draft EIS.

3-57 Paragraph three. "Precise estimates..." Oxymoron; should be reworded. (Individual, Leavenworth, WA - #15987.31200)

Public Concern: The Forest Service should use more than one example of beneficial stewardship activities on page 3-66 of the Draft EIS.

3-66 More than one example of beneficial stewardship activities need to be presented. This example is used five or six times; hopefully the agency has other programs such as this to use as examples. (Individual, Leavenworth, WA - #15987.31200)

Public Concern: The Forest Service should address typographical errors in paragraph two of page 3-137.

3-137 Paragraph two. "...to the NPWS; however..." Typographical error. (Individual, Leavenworth, WA - #15987.31200)

Public Concern: The forest service should reword the first sentence of paragraph five on page 3-141.

3-141 Paragraph five. This section is difficult to understand and should be reworded. The first sentence has grammatical errors that can be reworded. Replacing "result" and/or "from" may resolve this problem. (Individual, Leavenworth, WA - #15987.31200)

Public Concern: The Forest Service should reword or insert modifiers to the last sentence of the last paragraph on page 3-217.

3-217 Last paragraph. Last sentence of this paragraph needs rewording or the insertion of modifiers such as “most reasonable” and “that.” (Individual, Leavenworth, WA - #15987.31200)

Public Concern: The Forest Service should add “harvest” to the end of “…which do not prohibit roading and timber” on page 3-325.

3-235 Paragraph five [(middle of page)]. “...which do not prohibit roading and timber [[harvest].]” Add word. (Individual, Leavenworth, WA - #15987.31200)

Public Concern: The Forest Service should correct the spelling of “old growth dependant” on page 3-236.

3-236 Paragraph five “...old growth DEPENDANT...” misspelling. (Individual, Leavenworth, WA - #15987.31200)

Public Concern: The Forest service should replace “certainty” with “certainly” on page 3-237.

3-237 Paragraph one. “Certainty, with...” Replace with “certainly.” (Individual, Leavenworth, WA - #15987.31200)

Public Concern: The Forest Service should correct Table 3-19 with regard to fire statistics.

Managing fire in areas without roads is significantly more costly and less likely to be effective than in roaded areas. In the west, my experience indicates that your Table 3-19 is incorrect (possibly due to lack of site specificity). Many roadless areas with which I am familiar are at High Risk from catastrophic fire. (Individual, McCall, ID - #19994.84200)

Public Concern: The Forest Service should add “recreation stock use” to the list of dispersed recreation activities.

I also note in the wording of the proposed rule which deals with the various opportunity classes and gives examples of the type of recreation activities that could take place within the inventoried roadless and other unroaded areas that there is no mention of horseback riding or other forms of recreational pack and saddle stock use. This apparent oversight should be corrected by adding recreation stock use to the list of dispersed recreation activities. (Individual, Eden, UT - 17735.31100)

Public Concern: The Forest Service should withdraw Appendix A from the Draft EIS.

We request that appendix A of this proposal be withdrawn. (Individual, Rock Springs, WY - #21756.33510)

9.6 Definitions

Numerous definitions contained in the Draft EIS require clarification or modification according to many respondents. Such concerns are contained in this section, which is divided into three subsections: 9.6.1 Road Definitions and Classifications; 9.6.2 Miscellaneous Definitions; and 9.6.3 Additional Definitions.

9.6.1 Road Definitions and Classifications

Several respondents feel that the Forest Service should reevaluate and clarify its definition of a road. Some people even go so far as to suggest that the definition is purposefully misleading. "If someone were to be skeptical they might think that it was to make it appear that there were far too many roads on the forest to maintain," asserts one citizen. Others wish to have the 50-inch rule clarified. "What happens if it is 49 inches wide in one spot but much wider in most of the road?" queries one person. One respondent ponders on the meaning of "existing road." Still others wonder why the Forest Service has ostensibly changed the definition of the term "road" from the one contained in the Wilderness Act. Tangentially, one Oregon resident believes that the Forest Service should reassess the use of the term "Forest Service Roads." "These are not Forest Service Roads. These roads were built with public and private monies and managed by the Forest Service for the benefit and use of the American people," proclaims this individual.

The distinction between "roads" and "trails" is blurred for many readers of the Draft EIS. Citing the definition of a road contained in the Forest Service Manual, one recreational organization proffers, "a horse trail could be a road." Another respondent maintains that the definition of a road should be changed from 50-inches wide to 72-inches wide so that popular trails will not be decommissioned. "Many of the trails I have ridden are more than 50 inches wide yet are impassable for any vehicle other than a motorcycle or ATV," this person contends.

Such recreational concerns are common. Many citizens believe that the Forest Service should clarify various road levels and trail designations. Citing the fact that there are multiple levels of trails and roads, one respondent recommends that "there needs to be some mention of the differences." Yet another recreational forest user proposes that the Forest Service consider snowmobile trails as "winter roads." Conversely, others are concerned that the Forest Service definition of "other vehicle travelways" may lead to a ban on snowmobile access. One California resident believes the Forest Service should expand the definition of road to include any travelway used by horses, bikes, vehicles, or pedestrians.

In addition to the definition of the term "road," the definition of the classification "roadless" also elicits numerous requests for clarification and suggestions for improvement. Much like the road definition, some respondents believe the definition of roadless areas is purposefully misleading. "I believe that the word 'Roadless' has been redefined in such a way as to so confuse the general public with the result being that opinion polls have falsely indicated a favorable reaction to the proposed Roadless Initiative," charges one individual. Others recommend that the Forest Service not use the term "roadless" for areas that contain existing roads. "If the roads aren't maintained (which they aren't) that doesn't mean the road doesn't exist," observes one citizen. "If the roads exist the area isn't roadless." A County Official maintains that new definitions of "roadless"

conflict with guidelines applied in previous inventories and must be corrected. Other agencies state the definition of roads and roadless should comply with state and county definitions. One individual states that clearly defining boundary definitions of inventoried roadless areas could prevent the closing of areas which contain four-wheel drive roads. "Irreversible loss of roadless character" is another phrase in need of definition according to one respondent from Alaska. An environmental group from Wyoming suggests a very specific change to the definition of "roadless areas."

Like the term "roadless," "other unroaded areas" needs to be clarified, according to several respondents. "Designating other areas as 'unroaded' without defining them in regards to size, attributes, and other features should be dropped," asserts one constituent. In addition, this respondent believes such a loosely defined term will only lead to more litigation. "Classified" and "unclassified" roads need to be better defined as well, many people contend. One self-identified outdoorsman believes that the Forest Service should determine whether the redefinition of many existing recreational roads and trails as "unclassified" will result in the closure of campgrounds and other recreational facilities.

The definition of "reconstruction" is unacceptable to some respondents who believe the current "wording will prevent repair and rerouting of trails and roads that is actually better for the environment." In addition, the distinction between the "construction" and "reconstruction" of a road needs to be addressed in many respondents' minds. In a slightly different twist, one citizen feels that the Forest Service should clarify the difference between rebuilding a road and road reconstruction. "Could rebuilding, to restore the road to its original condition, be classed as reconstruction?" ponders this person. Still other respondents question what "new" road construction entails. Several people also question the exact measures the Forest Service would consider "maintenance," especially with regard to the actions the agency would classify as "reconstruction." Additionally, some respondents request a definition of "decommission."

Public Concern: The Forest Service should reevaluate and clarify its definition of a road.

Using the definition of a "road" as any throughway over 50 inches in width automatically excludes existing trails from consideration as "throughways" in these areas. (Individual, Valley Park, MO - #2201.32000)

I find the Forest Service roadless area proposal unacceptable. The definition of a road makes it sound like areas that have roads do not have roads. (Individual, Auburn, WA - #39.32100)

The current proposed definition of a road is, "a motor vehicle travelway over 50 inches wide, unless classified and managed as a trail." The AMA has objected numerous times to this imprecise definition. Nearly every route, regardless if its travel type will at some point in its course broaden to more than 50 inches. A strict rule interpretation may mandate that some motorized trails be defined as roads, or more specifically, "unclassified" roads. Though not currently classified as trails these "unclassified" routes may in fact be important access routes to motorized trails. "Decommissioning" these routes would be a de facto closing of "classified" motorized trails. I demand the Forest Service clarify and publish all definitions, and consider each route based on its traditional and historic use. (Individual, Canon City, CO - #1103.32100)

The agency should abandon the unique and confusing definition of the term "road" and use the more reasonable and universal definition which already enjoys widespread acceptance. "Any way, travel way, two track, trail, path or

other means of approach, except those whose purpose is for foot traffic only as evidenced by NEPA documentation." (i.e. the Appalachian Trail is a formally designated walking-only way). This publicly accepted definition is much more clearly understood by the 1.7 million visitors (and growing) who use these roads everyday. This definition was proposed within the out of court settlement agreement between the United Four Wheel Drive Association and the Forest Service in reference to this DEIS's companion document, the NATIONAL FOREST SYSTEM ROAD MANAGEMENT STRATEGY, ENVIRONMENTAL ASSESSMENT and Civil Rights Impact Analysis, Dated February 9, 2000 which also restricted the use of the terminology and definitions of road, classified road, unclassified road, or unroaded in forest planning, project implementation outside roadless areas, or for road obliteration or closure purposes until the Forest Service subjects the definitions to public comment. The correct definition of a "road" is critical to the success of this management plan and the liberal definition applied appears to conflict with other management documents which is sure to cause more confusion and controversy. (Individual, San Diego, CA - #2876.32100)

THE DEFINITION IS MISLEADING

This proposed rule contains no definition for road, thus it is misleading and deceptive. This proposal will close existing roads, thus it is misleading and deceptive. (Individual, Cortez, CO - #10533.43000)

For some reason the Forest Service has decided to shrink a road to 50 inches. So how did this new definition come about and why? If someone were to be skeptical they might think that it was to make it appear that there were far too many roads on the forest to maintain. But we know that no one in the government would ever try to mislead the people. I don't think that its quite that devious but I do think that it's misleading at best and down right shameful that a term like road has been redefined. (Individual, Hayward, WI - #13914.42000)

CLARIFY THE 50-INCH RULE

The so-called "50 inch" rule, which distinguishes a motorized "road," which is defined as over 50" and a motorized "trail," which is under 50" wide, is a distinction without a difference. What part of the road do you measure? What happens if it is 49 inches wide in one spot but much wider in most of the road? What happens if excessive use makes a 40" trail wider than 50"? These questions are not addressed at all by the rule. (Environmental/Preservation Organization, Brookport, IL - #1505.32100)

Public Concern: The Forest Service should clarify the term "existing road."

The Forest Service must clarify what is meant by the term "existing lease." The DEIS states "construction and reconstruction of roads, considered reasonable and necessary for energy or mineral development on EXISTING LEASES, would also be allowed under the [proposed rule] as access necessary to fulfill the terms of the lease." DEIS at S-39. NWMA [Northwest Mining Association] strongly agrees that existing leases should not be impacted by this rulemaking, but confirmation is necessary as to what constitutes an existing lease. Legally, the lease should be considered "existing" upon lease issuance, as that is the time when a contract between the United States and the lessee is entered into. This is in contrast to an existing operation, which is any activity after mining is approved to commence. Such a distinction is vitally important. First, at the time of lease issuance, the lessee could not have anticipated anything as outrageous as this roadless initiative. And second, it would be patently unfair to impose such new conditions on the contract at the time mining operations commence. Failure to acknowledge these facts could expose the USFS to costly litigation. (Mining Company, Spokane, WA - #16091.31100)

Public Concern: The Forest Service has changed the definition of the term "road" from the one contained in the Wilderness Act.

There are roads now in so-called roadless areas and you are changing the definition of a road under the one you have applied in the past under the Wilderness Act. (Individual, No Address - #8554.32100)

Public Concern: The Forest Service should reassess the use of the term "Forest Service Roads."

I am concerned about the philosophical shift reflected in the proposal to adopt the term "Forest Service Roads". These are not Forest Service Roads. These roads were built with public and private monies and managed by the Forest Service for the benefit and use of the American people. (Individual, Klamath Falls, OR - #13672.93610)

Public Concern: The Forest Service should recognize that any travelway used by horses, bikes, vehicles, or pedestrians is a "road."

Any travelway used by horses, bikes vehicles or pedestrians is a road. (Individual, Spring Valley, CA - #9729.32100)

Public Concern: The Forest Service should define "trail."

The proposed definition of "road" in section 294.11 defines it as a motor vehicle travel-way over 50 inches wide, unless classified and managed as a trail. The proposed rule contains no definition of a trail. Is that reference meant to refer to a forest development trail as defined in 36CFR #261.2? (Individual, Denver, CO - #29016.32200)

Public Concern: The Forest Service should clarify the distinction between "roads" and "trails."

Roads versus trails definitions need help for us all in management. (Individual, Grand Rapids, MN - #671.32000)

We need to have a trail-whether developed from a single-track footpath or from an old logging road. By your own definition in The U.S. Forest Service Forestry Handbook, Second Edition a road is "an open way for passage of vehicles, persons and animals, a path, course." Therefore, a horse trail could be a road. (Recreational Organization, Knoxville, TN - #6914.71300)

Public Concern: The definition of a road should be changed from 50-inches wide to 72-inches wide so that popular trails will not be decommissioned.

I am also concerned about the stated definition of road. 50 inches is not wide enough. Many of the trails I have ridden are more than 50 inches wide yet are impassable for any vehicle other than a motorcycle or ATV. I have assisted the Forest Service in the past with trail maintenance. The blade on the trail tractor used is very close to this measurement. It is my concern that many of the trails I ride would be defined as roads and subject to decommission. I would suggest a path greater than 72 inches be considered a road. (Individual, Chatsworth, CA - #6329.32100)

Public Concern: The Forest Service should clarify various road levels and trail designations.

Where will the "unclassified" trails for four wheeling fall? And also for motorcycles? … Can RS2477 be used for existing "unclassified" roads? Motorcycle trails are not so wide, where do they fall? Some people like difficult roads (four wheeling) and (motorcycles) for a challenge, where do these roads fall? (Individual, Tucson, AZ - #1394.32000)

There are multiple levels of roads; from hiking trails to single track, to unimproved dirt roads, to paved roads. There needs to be some mention of the differences. The terminology should reflect the true meaning and in plain, understandable English. (Individual, Arvada, CO - #5669.32000)

Public Concern: The Forest Service should consider snowmobile trails as winter "roads."

Please also consider snowmobile trails as winter "roads." (Individual, Salt Lake City, UT - #6740.32100)

Public Concern: The Forest Service should clarify the definition of "other vehicle travelways."

Another definition of road is, Other Vehicle Travelway--A travel route for NON-standard passenger vehicles which has not been mechanically constructed or improved and is not maintained. This designation may also apply to those older routes, where because of the passage of time, man's work is no longer substantially noticeable. "Other vehicle travelways" typically have been developed over time through use, and are described as "ghost roads." Snowmobiles and Sno-Cats may be banned due to this definition and no mention of emergency off highway vehicle use is applied. This definition also brings to bear Revised Statute 2477. (Wise Use/Land Rights Organization, Rock Springs, WY - #2866.32000)

Public Concern: The Forest Service should clarify the definition of the classification "roadless."

The classification 'roadless area' means that there is no well-maintained road in the area. It does not mean that there should be no roads or trails in the area. (Individual, No Address - #5673.71300)

By looking at maps and whatnot on the roadless web site, I can only hold my breath. In regards to the confusion whether roadless does mean "vehicles prohibited" or to mean, no further maintenance available…is quite confusing to the reader. (Individual, Dover, MN - #7663.32100)

I took a look at the proposed maps. At first glance, the whole "roadless" proposal looks harmless enough. However, when we as a Nation can't decide what the definition of "is" is, how are we to know what the definition of "roadless" is. Are "roads" considered to be something covered with asphalt or at least gravel? Are they something maintained and 20 feet wide? I read that "provisions for firefighting will be maintained." To me, that reads, "Yes there will be two track Forestry Roads, but you, the proletariat, will be locked out." Is this the bottom line? If it is, then say so. Is Government Double-speak in use? (Individual, No Address - #2066.31300)

THE DEFINITION IS MISLEADING

I believe that the word "Roadless" has been redefined in such a way as to so confuse the general public with the result being that opinion polls have falsely indicated a favorable reaction to the proposed Roadless Initiative. (Individual, Challis, ID - #8518.32000)

INVENTORIED ROADLESS AREAS, UNROADED AREAS, AND CLASSIFIED ROADS

The Forest Service needs to clear up the confusion over the relationship between inventoried roadless areas, unroaded areas, and classified roads. Roadless areas should be defined to include: all previously inventoried roadless areas except those that have subsequently been deliberately roaded by the Forest Service; and similarly undeveloped lands (including small areas adjacent to designated wilderness and inventoried roadless areas) that were passed over in prior inventories or have subsequently been added to the National Forest System. Additionally, unroaded areas should be defined as tracts with more than 1,000 acres of contiguous land that is generally free of

roads suitable for standard (2-wheel-drive/low-clearance) highway vehicles. Further, the definition of "road" must clearly differentiate a road from a motorized or non-motorized trail "on-the-ground." In other words, anyone should be able to look at a route and know if it is a road, a motorized route or a non-motorized trail. The old definition of a road was: "a general term denoting a way for purposes of travel by vehicles greater than 50 inches in width." This definition comes from FSH 7709.54 and does not refer to trails, which are defined separately. It is intended for identifying roads on the ground. The new definition is: "a motor vehicle travelway over 50 inches wide, unless classified and managed as a trail. A road may be classified or unclassified." The key difference here is that in the new definition, the Forest Service has changed from a travelway for VEHICLES greater than 50 inches, to a TRAVELWAY greater than 50 inches. (Recreation Organization, Missoula, MT - #17896.32000)

Public Concern: The Forest Service should not use the term "roadless" for areas with existing roads.

Please stop using the term "roadless" to describe areas that contain my family's recreational roads and trails. (Individual, Lakewood, CA - #105.32100)

I have used the trails in Cache National Forest for 60 years. I can't see how the area can now be termed "Roadless". If the roads aren't maintained (which they aren't) that doesn't mean the road doesn't exist. If the roads exist the area isn't roadless. (Individual, Logan, UT - #5638.32100)

Public Concern: The Forest Service should address conflicts between the proposed definition of roadless and the guidelines used for previous inventories.

New definitions of "roadless" are proposed which conflict with the guidelines applied in the previous inventory process. This has led to much confusion about the proposal and the DEIS publicly, on a local ranger district level, and in regional forest service offices. A process for correcting these inadequacies must be provided. (County Elected Official, Markleeville, CA - #16277.31300)

Public Concern: The Forest Service definition of roads and roadless should comply with state and county definitions.

The general public at large has not experienced first hand the phenomenon of the redefinition of road by the USFS. This definition flies in the face of State and County governments. Wyoming Statute 24-3-201 (attached), in part says that the legislature finds that due to inaccurate and inconsistent records, there exists roads which are seldom used, not maintained and are not identified as or believed by the public to be county roads but are, in fact, county roads. The USFS in site-specific occasions may not be consistent with some State law in reference to the term "roadless." (Wise Use/Land Rights Organization, Rock Springs, WY - #2866.32100)

Public Concern: The Forest Service should set clear boundary definitions for inventoried roadless areas.

I feel that the boundary definitions of the inventoried roadless areas are not being set in a very practical way. At least here in Arizona, my impression is that "sort of roadless" is being called "roadless" with the results that 4WD trails in that area are being closed. (Individual, Tucson, AZ - #13317.32100)

Public Concern: The Forest Service should define "irreversible loss of roadless character."

In chapter 3, page 11, the Forest Service needs to define “irreversible loss of roadless character”. (Professional Association, Anchorage, AK - #43416.33300)

Public Concern: The Forest Service should modify its definition of inventoried roadless areas in Section 294.11 of the proposed rule.

We request that the agency change definition of “Inventoried roadless area” in Section 294.11 of the Rule to read as follows: “Inventoried roadless areas: Undeveloped areas that were classified or inventoried as “roadless” in the Forest Service's Roadless Area Review and Evaluation (RARE II) process, forest planning, or subsequent assessments or Forest Service determinations. Roadless areas shall typically be at least 1,000 acres in size, though smaller areas may be classified as “roadless” under this Rule where the Forest Service determines such areas have important values that warrant such classification. For a given unit of the National Forest System, the locations of these areas shall be identified in a set of maps maintained in the Supervisor's office of the unit in question.” (Environmental/Preservation Organization, Laramie, WY - #43735.32000)

Public Concern: The Forest Service should define the terms “unroaded” and “other unroaded areas.”

All “other unroaded areas” are not defined and make decision making difficult. I feel these areas may be a major part and should not be included. (Individual, Flagstaff, AZ - #917.32000)

To add to the level of misunderstanding, the Forest Service is also using three differing definitions of “unroaded” within the three rule proposals. The definitions provided in the Roadless EIS and the Road EA each differ and vary from the overarching Forest Service Manual definition. We question whether all of these “unroaded” areas, depending on the definition, will eventually be considered in the Roadless proposal. Under the rule proposals of ICBEMP and the EA, additional lands will be ruled “unroaded” and roadless in the future, thus drastically increasing the amount of lands that are presently not considered under the Roadless proposal. The Forest Service apparently recognizes this effect, as it understands generally that the three proposals are “closely related.” (State Elected Official, Helena, MT - #19289.31300)

The Agency needs to clearly define “unroaded characteristics.” (Professional Association, Bethesda, MD - #51146.32100)

CUMULATIVE IMPACTS OF THE NATIONAL ROAD MANAGEMENT STRATEGY We have concern over the impacts of additional “unroaded” areas as defined in the National Forest system Road Management Strategy which were not fully analyzed as part of the DEIS. Forest Service Manual (FSM) 7710-Transportation Atlas, Records, and Analysis-Federal Register, Vol. 65.No 43, Friday, March 3, 2000, Notices, page 11691, Item 2 (a) (2 & 3) defines “unroaded” areas. In accordance with the proposed revision: “Unroaded portions of roadless areas identified in existing land and resource management plans that lie one-quarter mile or more beyond any existing classified road, and”... “ Unroaded areas of more than 1000 acres that are contiguous to remaining unroaded portions of RARE II inventoried roadless areas or contiguous to areas inventoried in land and resource management plans, contiguous to congressionally designated wilderness areas or Federally-administered components of National Wild and Scenic River System classified as Wild, or contiguous to unroaded areas of 5000 acres or more on other Federal lands. These areas of 1000 acres or more must have a common boundary of considerable length, at least one-quarter miles width, and provide important corridors for wildlife movement or extend a unique ecological value of the established inventoried area. Road construction in roadless and “unroaded” areas and generally reconstruction in those areas will constitute a significant environmental effect and will require the preparation of an environmental impact statement.” Page 2-2 of the Roadless Area Conservation DEIS defines “unroaded” areas as “areas without the presence of classified roads, which are of a size and configuration sufficient to protect the inherent characteristics association with their unroaded condition. These areas have not been inventoried and are therefore separate from inventoried roadless areas” (emphasis added) (State Elected Official, Helena, MT - #19289.72220)

THE DEFINITION WILL INCREASE LITIGATION COSTS

Designating other areas as “unroaded” with out defining them in regards to size, attributes, and other features should be dropped. The loosely defined “unroaded” will be a nightmare for managers to define, and requires additional needless analysis. Present F.S. NEPA analysis and all of the ESA requirements are more than adequate to protect these areas. Making “unroaded” areas will only increase the expensive litigation. The idea that if roads are decommissioned into an area that the area becomes “unroaded” is ridiculous. This will only discourage managers from decommissioning roads for fear that extra constraints will be put on the area. (Individual, McCall, ID - #7575.71100)

Public Concern: The Forest Service should clarify the definition of the term “classified road.”

I believe you have gone too far with your roadless proposal. The definition of what is classified as a road is too ambiguous. Roads that have been open for 30+ years could be closed. I do not support this initiative. (Individual, Phoenix, AZ - #1763.32100)

The definition of a classified road under 294.11(1) should specifically include RS2477 roads. The definition should be expanded to roads that are PLANNED OR MANAGED, OR USED for motor vehicle access. (County Elected Official, Fallon, NV - #17290.32100)

Public Concern: The Forest Service should determine whether the redefinition of many existing recreational roads and trails as “unclassified” would result in the closure of campgrounds and other recreational facilities.

As an outdoorsman and long time Idaho resident, I am deeply troubled by the Forest Service’s proposed set of rules regulating roadless areas. These proposed rules redefine many existing recreational roads and trails as “unclassified” roads. This means that such areas can be designated as roadless, and that many public campgrounds and other recreational related facilities accessible by these unclassified roads will suddenly become roadless areas. (Individual, Boise, ID - #6948.32100)

Public Concern: The Forest Service should reevaluate its definition of “reconstruction.”

The definition of reconstruction is unacceptable. The wording will prevent repair and rerouting of trails and roads that is actually better for the environment. The intent may not be so but anti-access groups will use the way these are worded to stop multi-use trail projects. (Individual, Auburn, WA - #39.32100)

Section 294.11 (3) REBUILDING This Section is unduly restrictive. It appears that it would apply to a classified road that is currently being utilized below its service level. The definition makes no distinction between classified and unclassified roads. The proposed rule needs to make clear that the definition of ROAD CONSTRUCTION, ROAD MAINTENANCE, AND ROAD RECONSTRUCTION do not apply to classified roads other than Forest Service Roads. (County Elected Official, Fallon, NV - #17290.32100)

Public Concern: The Forest Service should clarify the distinction between "construction" and "reconstruction."

There has to be a clear definition between "construction" and "reconstruction" of roads. …I hope the Forest Service takes these considerations into account and the communities this will affect. (Individual, Spokane, WA - #5481.32000)

Public Concern: The Forest Service should clearly define "new" road construction.

When I read that the Draft Roadless Plan calls for no new road construction within inventoried roadless areas of 5,000 acres or more, I wonder what this means. It really depends on what the meaning of the word "new" is. (Individual, Billings, MT - #16957.31300)

Public Concern: The Forest Service should clarify the difference between rebuilding a road and road reconstruction.

On page S-7, you have defined "construction & reconstruction" (ending with the catchall phrase "but not limited to,"). Could rebuilding, to restore the road to its original condition, be classed as reconstruction? You need to change reconstruction to "altering". (Individual, Arvada, CO - #5669.32000)

Public Concern: The Forest Service should clarify the definitions of "reconstruction" and "maintenance."

The DEIS does not provide a clear definition as to the maintenance of these existing roads which are allowed to continue supporting existing activities. The definitions of "reconstruction" and "maintenance" are ambiguous and lead to confusion as to the intent of the proposed rule. The "…act of keeping fixed assets in acceptable condition…" which is an acceptable maintenance activity is easily construed to be a "rebuilding" activity which is prohibited. (Individual, San Diego, CA - #2876.32100)

Public Concern: The Forest Service should clarify the definition of the term "maintenance."

You acknowledge the existence of roads within the "roadless areas," and under alternative #2, that they will remain open. How will you define maintenance of these existing roads and trails? (Individual, Arvada, CO - #5669.32000)

Public Concern: The term "decommission" should be defined in the document.

What does "decommissioned" mean? It's not listed in the glossary of the Roadless Area Conservation Guide. If you "decommission" a "classified road", does it become an "unclassified road"? Or does it become a road that prohibits travel by off-highway vehicles? (Individual, Tijeras, NM - #2993.32100)

9.6.2 Miscellaneous Definitions

A few of the definitions respondents wish to have clarified pertain only to their usage within the context of the proposed rule. For example, an individual requests that the Forest Service define the term "valid" as it pertains to access to public or private land within roadless areas. Some respondents would like the Forest Service to define "valid existing rights" and others would like a definition of "existing lease." A similar request is made by a resident of Washington State. This person asks the Forest Service to define what "essential management" means in terms of exceptions to roadless area incursions. Yet another respondent requests a definition of "stewardship" in the context of the proposed rule's prohibition of timber harvest except for stewardship purposes. An individual believes the Forest Service should define "impairment" as it relates to watersheds. Another respondent would like to see the definition of "huge" as it relates to the quote on page 3-126 of the Draft EIS, "HUGE numbers of people who hike the Appalachian Trail." Three hundred hikers a year does not fit this respondents definition of huge. Conversely, a county official believes the Forest Service should define threatened, endangered, proposed, and sensitive species.

Others wish to add criteria to existing definitions in the proposed rule. One person feels that the Forest Service should include recreational and timber harvest access in the proposed rule's definition of "vital access." A wise use organization suggests the Forest Service define "protect," as it is used numerous times throughout the Draft EIS. A timber association observes various definitions of "protection" can render many of the public comments meaningless or at least open to various subjective determinations as to their meaning. Similarly, another respondent asks that the Forest Service include people who use paper or live in wooden houses in its definition of "stakeholders." Additionally, one person wishes to see the Draft EIS rewritten to recognize and identify small entities as having the same meaning as small business, small organization, and small governmental jurisdiction pursuant to the Regulatory Flexibility Act.

On an unrelated note, a wise use organization requests a clarification of the concept of a standard passenger vehicle. "The definition of standard passenger vehicle could in the future preclude service utility companies' access on or across lands necessary for energy and communication distribution that allows our county to function and prosper," this group ventures. "The ability to fight fires also would appear to enter into this designation as would search and rescue crews' ability to effect their role in our forests." Along the same lines, other respondents seek clarity regarding "off-road" and "off-highway" vehicles.

Public Concern: The Forest Service should define the term "valid" regarding access to public or private land within roadless areas.

Please define the term VALID when used to describe access to public or private land within roadless areas. (Individual, Sovey, MI - #670.32000)

Public Concern: The Forest Service should clarify the definition of "valid existing rights."

The term "valid existing rights" is not clearly defined. The DEIS discussion on pages 3-140 and 3-141 is so broad and general that there can be no meaningful comment. Litigation over R.S. 2477 road designations and access to easements for ditches, canals, and pipelines is bound to result from this grossly inadequate analysis. (Business, Dillon, MT - #29016.32000)

Public Concern: The Forest Service should modify its definition of "existing lease" in the Final EIS.

The Forest Service did not adequately define the term "existing lease." A lease is considered "existing" at the time of its issuance as opposed to the time when activity is approved to commence. (Business, No Address - #52032.32000)

Public Concern: The Forest Service should define what "essential management" means in terms of exceptions to the roadless areas.

What does "essential management" mean in terms of exceptions to the roadless areas? (Individual, Bellingham, WA - #3971.32000)

Public Concern: The Forest Service should define the term "stewardship."

In reference to the question that asks how does prohibition of timber harvest except for stewardship purposes under alternative 3 differ from prohibition of all timber harvest under Alternative 4? I have a number of comments. First of all, it would be helpful to define "stewardship" as used in this context. (Individual, Moses Lake, WA - #718.64000)

Public Concern: The Forest Service should define the term "impairment" as it is used to describe watersheds.

The statement is made that "the percentages of impaired stream miles within the watersheds are noted, but this does not imply that the impairments were the result of activities on NFS lands within the watersheds. Of the 533 watersheds with impaired waters, 356 have between 1% and 10% impairment, 146 have between 11% and 25% impairment, and 31 have greater than a 25% impairment." It is impossible to say what this paragraph actually means. "Impairment" is not defined anywhere, nor how much stream impairment is actually tolerable within watersheds. (Individual, No Address - #52489.33300)

Public Concern: The Forest Service should define the term "huge."

I'd like to see your definition of "huge." Reference page 3-126, HUGE numbers of people who hike the Appalachian Trail. Only 5300 people have hiked the entire AT since its inception in 1968. I believe about 300 people a year currently hike the AT. This is certainly not my definition of huge. (Individual, Summerdale, PA - #29543.33300)

Public Concern: The Forest Service should define threatened, endangered, proposed and sensitive species.

Page 3-92, second paragraph--Threatened, Endangered, Proposed, and Sensitive Species need to be defined. None of these terms can be found in the glossary. In addition, there is no reference where the species in Appendix C reside locally--identification of Forest Service regions is lacking specificity. RELIEF: The Forest Service must define these terms and include them in the glossary. Also, Appendix C must disclose the counties where these species may be found. (County Elected Official, Basin, WY - #43980.32000)

Public Concern: The Forest Service should include recreational and timber harvest access in the definition of "vital access."

There is language in the DEIS allowing for evaluation of road 'decommissioning' and prohibition of reconstruction where vital access is not a factor. Vital access, however, is not adequately defined, and should include recreational access (including OHV use) and timbering access for reduction of fire hazard and disease control. (Individual, Littleton, CO - #134.32000)

Public Concern: The Forest Service should define the word "protect."

The term "protect" is widely used in the DEIS yet is not defined. An elevation of the full range of protection implications is required. Protection from fire, insect disease is not sufficiently addressed. Therefore USA-ALL recommends the adoption of Alternative I, the No Action alternative. (Wise Use Organization, Salt Lake, City, UT - #16190.32000)

The Forest Service left an important term undefined. While a list of definitions was distributed to the public at the "listening sessions" and other public meetings, the term "protection" remained undefined. This is an important omission, since to some people the active management techniques generally associated with commercial timber production are "protective" activities with respect to insect and disease control and fire management. The point could also be made that all areas within the National Forest System are "protected" by virtue of their inclusion in the NFS (i.e., they are protected for multiple use forest purposes and cannot be converted to non-forest land use). Thus, in the absence of a definition of "protection," the Forest Service cannot know with any degree of certainty what a particular commenter might mean by saying he or she wants roadless areas "protected." Without a definition of the term "protection" many of the public comments received by the agency were rendered meaningless or at least are open to various subjective determinations as to their meaning. (Timber Association, Ketchikan, AK - #43609.32000)

Public Concern: The Forest Service should include people who use paper or live in wooden houses in the definition of "stakeholders" on page S-39 of the Draft EIS.

Page S-39; "Stakeholders" are defined as those with the strongest interests on NFS lands. Add people who use paper and/or live in wooden houses to "stakeholders" with the strong interests in NFS lands. (Individual, Twain Harte, CA - #1632.90000)

Public Concern: The Draft EIS should include all definitions of small entities contained in the Regulatory Flexibility Act.

The DEIS must be rewritten to recognize and identify small entities as having the same meaning as small business, small organization and small governmental jurisdiction pursuant to the Regulatory Flexibility Act of the Small Business Regulatory Flexibility Enforcement Fairness Act. Small governmental jurisdiction means governments of cities, counties, towns, townships, villages, school districts or special districts, with a population of less than 50,000. Almost all of the communities, towns, cities and counties in the affected area of this proposed Roadless Conservation Area policy meet his definition. (Business Association, Beaverton, OR - #52230.55400)

Public Concern: The Forest Service should clarify the definition of user vehicles.

STANDARD PASSENGER VEHICLE

According to the USFS, "Roadless area" is literally an area without any "improved" roads maintained for travel by standard passenger type vehicles. This seems to meet the intent of the Service to further their quest of de facto wilderness area extensions. It is interesting to note the Draft Criteria (June 16, 1999) for the Intermountain Region, used by the USFS in Region 4, for the definition of standard passenger vehicles, is contradictory at best. It states, "A standard non-modified, street legal vehicle greater than 50 inches in width which is designed for travel on paved or maintained gravel surfaces. Typically envisioned are four-door sedans, station wagons, minivans and other vehicles found on city streets and highways, which have not been modified for off road travel or extreme road conditions. Because vehicle types have changed over time," (and this is the contradiction), "sport-utility vehicles, light trucks and regular trucks would also be considered standard passenger vehicles. The presence or absence of 4-wheel drive should not be an indicator of whether a vehicle is a standard passenger vehicle due to the prevalence of this feature on most vehicles of all types." Industry standard for light-truck parts sales carries the size of the vehicle through the 1-ton category, including the new ford Superduty 4x4 class of light-truck. The question then remains what is the definition of "regular trucks"? This definition is contrary to Original Equipment Manufacturers (OEM) designs of 4-wheel drive vehicles which are not modified but are originally equipped to also navigate under extreme conditions. Interstate and intrastate paved roads at times experience extreme road conditions. The definition of standard passenger vehicle could in the future preclude service utility companies access on or across lands necessary for energy and communication distribution that allows our county to function and prosper. The ability to fight fires also would appear to enter into this designation as would search and rescue crew's ability to affect their role in our forests. (Wise Use/Land Rights Organization, Rock Springs, WY - #2866.32000)

OFF-ROAD/OFF-HIGHWAY VEHICLE

The terminology of "Off-road vehicle" must be better defined. Specifically, differences between OHVs, ORVs, and ATVs needs to be clarified. (Individual, Chapel Hill, NC - #52231.91612)

Just the definition of what is or is not a road is not adequate. The term "off-highway" for travel and vehicles is mixed with "off-road". The term off-highway should be every established trail or road, many of which are not "maintained". (Individual, Tucson, AZ - #25227.32100)

9.6.3 Additional Definitions

Several terms used throughout the document are not familiar to certain respondents. The terms "non-attainment," "even-aged," "shelterwood," "potentially isolated," and "seed tree" should all be defined in the Final EIS, according to some. Additionally, one citizen feels that the Forest Service should include "recreation" in the glossary. Similarly, one elected official exhorts the Forest Service to define all the acronyms used in the Draft EIS and include them in the glossary.

Respondents also request definitions for terms dealing with hazardous situations, such as "wildland" and "imminent".

Public Concern: The Forest Service should define the term "non-attainment" in the Draft EIS.

Comment: Page 3-44, fifth paragraph-- It is certainly not apparent to most readers what a "non-attainment" area is. A definition is not provided in the text or in the glossary. Relief: The Forest Service must define these terms and add them to the glossary. (County Elected Official, Worland, WY - #16185.32000)

Public Concern: The Forest Service should define the terms "even-aged," "shelterwood," and "seed tree."

Comment: Page 3-114, last paragraph-- Terms such as "even-aged, shelterwood, and seed tree" need to be defined for the reader. They should also be included in the glossary. Relief: The Forest Service must include these terms in the glossary. (County Elected Official, Worland, WY - #16185.32000)

Public Concern: The Forest Service should include "recreation" in the glossary of the Draft EIS.

Glossary of Road Terms does not cover or include recreation as a definite term. (Individual, Tucson, AZ - #1394.32000)

Public Concern: The Forest Service should clearly define "potentially isolated" areas.

"Potentially isolated" areas; what is this referring to? It is quite unclear as written. In addition, they represent a very small proportion of the ITAs. Is this important enough to discuss in such painful detail? (Individual, Leavenworth WA - #15897.31100)

Public Concern: The Forest Service should define all acronyms used in the Draft EIS.

Comment: Page 3-31, first and fourth paragraphs-- The average reader will have no idea what TMDL's are. These bureaucratic acronyms and abbreviations need to be defined in the glossary as well as defined the first time they are used in each section of the document. Relief: The Forest Service must define these terms and include them in the glossary. (County Elected Official, Worland, WY - #16185.32000)

Public Concern: The Forest Service should remove the term "wildland" from the Draft EIS.

The term "wildland" is referenced many times throughout the DEIS. Yet, there is no definition for this term, even in the DEIS glossary, this term should be removed not only from the DEIS but also from any other support documents. (Mining Organization, Reno, NV - #15907.31100)

Public Concern: The Forest Service should clarify what constitutes "imminent".

A road is needed to protect public health and safety in cases of an imminent threat of flood, fire, or other catastrophic event that, without intervention, would cause the loss of life or property; Comment: There should be clarification about what constitutes "imminent". Does this mean the fire is actually burning, or only a high fire condition index? (Environmental/Preservation Organization, Ashville, NC - #43412.31100)

9.7 Adequacy of Maps, Tables, Figures, and Appendices

Numerous respondents exhort the Forest Service to make its maps clear and accurate in the document and on the web. The maps lack sufficient detail to accurately determine the boundaries of roadless areas, according to one recreational organization. The Forest Service should update maps to include uninventoried unroaded areas and wilderness areas. Others believe the Forest Service should provide legible maps with a larger scale. Proclaiming that the maps in Volume 2 of the Draft EIS "are impossible to review," a business representative attests that such a lack of clarity is "probably deliberate to further obfuscate the damage you are doing to the people and land of the western United States." While not insinuating a conspiracy, one person does point out that the maps provided on the internet do not match the Forest Service's GIS coverage.

Questioning the veracity of current maps, other respondents request that the Forest Service create accurate, up-to-date maps and acreage calculations of the unroaded portions of inventoried roadless areas. Additionally, several people ask that the Forest Service map the location and size of every roadless and unroaded area before proceeding with the proposed rule.

One Utah resident, citing a similar concern to the aforementioned internet maps, requests that the Forest Service reconcile the large discrepancy in the number of acres of inventoried roadless areas on the Intermountain Region web site with that on national forest maps. The accuracy of the Inyo National Forest maps in Volume 2 of the Draft EIS is also called into question by some. The Forest Service should also clarify the table of contents for Volume 2 of the Draft EIS. Another specific question of clarification involves the northern-most portion of the Badger-Two Medicine area of the Lewis and Clark National Forest. One respondent wishes to know whether this area is considered an "inventoried roadless area" on the roadless Draft EIS map. An individual requests the forest Service improve the shading in figure 3-17 so the map and legends match. The Forest Service should make the graphics in the Draft EIS easier to read.

A related concern for some respondents is the determination of mining permissive tracts in the Draft EIS maps. "Using a single map of an entire geographic region of multiple states showing permissive tracts of undiscovered mineral deposits combined with a similar scale map of

roadless areas results in a gross misunderstanding of the effects of the proposal upon minerals production and economics," an individual proffers.

The tables designed to elucidate the Draft EIS's proposals elicits comments from some readers of the document. Since many tables contain wording such as "may cause" and "could increase," some respondents suggest that the tables should exclude such terms and include scientifically based, definitive language. Citing a similar concern, one elected official believes that the Forest Service should modify tables 2-2 and 2-3 to include all information disclosed in Chapter 3 of the Draft EIS. "The table comparing the alternatives and environmental consequences provide an incomplete comparison by omitting certain sections analyzed in Chapter 3, Environmental Consequences. This leads to potential errors in interpreting the full effects of each alternative," this individual asserts. Additionally, there is some confusion over Table 3-20 regarding percentages of areas at risk to wildfires.

This same official also proposes that the Forest Service clarify discrepancies between table 2-2 and page 3-76 of the Draft EIS. "On Page 3-76, a reference is made to a 33% reduction in timber harvest levels over other alternatives. A review of Table 2-2 indicates this reduction is 66%," this person posits. "This represents a 50% increase in harvest level reductions."

Citing a recently published forest plan revision for the Medicine Bow National Forest, one timber association representative requests that the Forest Service reconcile the discrepancy between the number of roadless area acres stated in the plan revision with the number presented in Appendix B. "Our conclusion is that even though the proposed rule is supposed to apply to only the 'unroaded portions of inventoried Roadless Areas,' in fact, the acreages in Appendix B include 'roaded portions of inventoried roadless areas' as well."

Public Concern: The Forest Service should make its maps clear and accurate.

Your maps in Volume 2 are impossible to review. Poorly presented and probably deliberate to further obfuscate the damage you are doing to the people and the land of the western United States. Be sure to change your Project Website Maps so as to better inform the public of your onerous intentions. (Business, Boise, ID - #75.44210)

The adobe maps you have for download do not match your GIS coverages. The Oregon sand dunes area in the Siuslaw has very little protection, and shouldn't be left out of the adobe maps…it's in the roadless coverage. Also the adobe maps of the Maiden peak/Waldo lake roadless areas are not matching. The adobe maps don't represent all of the areas, they leave out sections which the GIS roadless coverages shows. Please fix these areas. (Individual, Portland, OR - #404.44230)

Given the significant number of acres, the disparate types of terrain, tract sizes and locations involved, the maps included with the DEIS lack sufficient detail to accurately determine the boundaries of the previously identified "inventoried roadless" areas and the inclusion (or proximity) of existing roads. The generic maps provided a pictorial display of areas and do not adequately identify all of the existing roads and landmarks to accurately determine the boundaries. For example, were you aware that the state of New Mexico operates a state highway through one of these cartoon areas? You wouldn't if you relied on your provided maps. Not being intimately familiar with all 40 to 60 million acres, I find it difficult to intelligently comment under these conditions. (Recreational Organization, Los Alamos, NM - #5663.30000)

The map "Inventoried Roadless Areas on National Forest System Lands" has a dark green color to designate some areas. The code for that color indicates it includes "wilderness areas, wild and scenic rivers and national monuments." That makes the color uninformative as to roadless areas because it includes both roadless areas and areas containing roads. Therefore the dark green areas should be broken down to show which parts are roadless and which are not. The same problem applies to a map of Arizona. (Individual, Tucson, AZ - #13128.33600)

I have looked at the US Forest Service map of roadless areas in the Ozark National Forest, including the Dismal Creek "inventoried special interest area". The map shows a road going up the Dismal Creek drainage marked "Forest Service Road 1458A" No such road exist. I have hiked all the way down Dismal Creek from the Glory Hole near Arkansas Highway 16 to our place where Dismal Creek joins Walnut Creek. There is no road there, nothing resembling a road, and there has not been one since we bought the place in about 1993. You have to bushwhack the whole way down that drainage. If there ever was an old logging road, it has totally disappeared. If this "phantom road" is typical of Forest service mapping in other parts of the Ozark and Ouachita National Forests, then there is a serious problem. (Individual, Fayetteville, AR - #15439.32100)

CORRECT INACCURACIES OF MAPS ON THE WEB.

I will comment on the maps and associated databases provided as part of the DEIS. I found these maps to be a great resource for the public. However, they have numerous errors and inconsistencies that should be corrected in the final EIS. This is true of both the PDF files and the shape files, but the shape files seem to be especially "raw". I have included three annotated maps that delineate some of these errors on the Stanislaus and Toiyabe National Forest in California (Individual, Albany, CA - #26866.33600)

The recommended Hoover additions (both Congressionally-mandated and Forest Plan-derived) are a source of error in the inventory. The western addition is in the PDF file, but not the SHAPE file. The eastern proposed addition is in neither file. This error needs to be corrected. (Individual, Albany, CA - #26866.33600)

I have been unable to view the downloadable maps on the roadless.fs.fed.us web site. The scale and detail of the maps make specific information unobtainable without many hours of effort, effectively preventing detailed public comment. The "roadless" areas defined for the Ottawa National Forest have been logged for many years, and roads through the forest are numerous. The maps and information to define the roadless area is incorrect. (Individual, Tustin, CA - #15501.34100)

Public Concern: The maps included with the Draft EIS should provide sufficient detail.

Given the significant number of acres involved, the maps included with the DEIS lack sufficient detail to determine the boundaries of the identified "inventoried roadless" areas and the inclusion (or proximity) of existing roads. The generic maps provided a pictorial display of areas and do not identify existing roads and landmarks to determine the boundaries. (Individual, San Diego, CA - #2876.34000)

Using a GIS overlay at a national scale is meaningless. (Individual, McCall, ID - #19994.33600)

UPDATE MAPS TO INCLUDE UNINVENTORIED UNROADED AREAS AND WILDERNESS AREAS

The DEIS separates currently unroaded areas into a variety of categories. One of those categories is uninventoried unroaded areas. The DEIS does not contain maps of these uninventoried unroaded areas for the Panhandle National Forest in Region 1 of the Forest Service. We are requesting a current map of the Panhandle National Forest that specifically identifies the uninventoried unroaded areas within that National Forest's boundaries. (County Elected Official, Bonners Ferry, ID - #16104.44240)

Maps and texts do not accurately identify wilderness areas. Therefore, the public is not well informed of the true nature of the environments. (Individual, Ford, CA - #15244.33000)

Have all existing Forest Routes been included in the Inventory of Roadless Areas?
Have all Roads and 4 Wheel Drive Routes shown on most recent USG Topographical maps been included in the Inventory of Roadless Areas? (Individual, No Address - #6301.71300)

INCREASE SCALE

With only small scale maps of the roadless areas for our review it is difficult to know where the proposed boundaries are located. (Recreational Organization, Bozeman, MT - #7512.34000)

There have not been any detailed (1 inch = 1 mile) maps available on which to base reasonable decisions. It is impossible to determine exactly what areas are encompassed by this DEIS based on the maps supplied. (Individual, Thousand Oaks, CA - #15923.33600)

Please provide a separate mailing of maps of all Counties in the State of Idaho to a scale of 1:150000. Copies of these maps, colored so as to exhibit the damage you intend to do, should be available to all public meetings as well as mailed to all persons requesting and receiving your hastily and poorly prepared Volume 2. (Business/Business Association, Boise, ID - #75.44240)

Public Concern: The Forest Service should create accurate, up-to-date maps and acreage calculations of the unroaded portions of inventoried roadless areas.

Finally, we are very confused about the actual acres and areas that will be affected by the proposed rule. For example, the Medicine Bow NF recently published an updated inventory of Roadless Areas as part of the revision of their forest plan. That inventory showed 319,738 acres of inventoried roadless areas on the Medicine Bow NF. However, Appendix B indicates that there are 378,000 acres of “Inventoried Roadless Areas” on the Medicine Bow NF. An example of one reason for this discrepancy is the East Fork Encampment Roadless Ares, which was calculated in the new inventory as 7,429 acres; that compares to 11,330 acres for the Coon Creek Roadless Area, as this area was previously named. Similar discrepancies are evident fore the White River National Forest, the Arapaho Roosevelt National Forest, and the Nebraska National Grasslands. For example, the DEIS for the revision of the White River National Forest, LRMP states on p 3-379 - “There are 37 roadless areas on the WRNF, totaling approximately 298,000 acres; yet the Roadless DEIS Appendix B shows 642,000 acres of “Inventoried Roadless Areas.” Our conclusion is that even though the proposed rule is supposed to apply to only the “unroaded portions of inventoried Roadless Areas”, in fact, the acreages in Appendix B include “roaded portions of inventoried roadless areas” as well. Additionally, it appears that despite the footnote on page B-11, i.e., “Inventoried Roadless Areas are based on forest plans, forest plan revisions in progress where the agency has established an inventory, or other assessments that are completed or adopted by the agency. RARE II information is used if a forest does not have a more recent inventory based on RARE II”, that forest plan revision inventories have been incorporated into this process. These discrepancies are unacceptable for a proposal of this significance. Because of these discrepancies and the confusion associated with the differences, we believe that it is absolutely essential that the Forest Service produce an accurate, up-to-date, and consistently calculated acreage and maps of the “unroaded portions of inventoried Roadless Areas” for public review and comment prior to a decision on this proposal. (Timber Company, Rapid City, SD - #15900.33520)

Public Concern: The Forest Service should map the location and size of every roadless and unroaded area before making any rules.

Before making such rules the Forest Service should first map location/size of every supposed roadless and unroaded areas. (Timber Company, Winston, OR - #2138.33600)

If the Forest Service insists on going forward, a new NOI should be developed that includes: A detailed list of areas being considered, including maps. (Individual, Titusville, PA - #905.33520)

Public Concern: The Forest Service should reconcile the large discrepancy in the number of acres of inventoried roadless areas on the Intermountain Region web site with that on national forest maps.

[The Intermountain Regional Forester] wrote that "In the 32 million-acre Intermountain Region (includes Nevada, Utah, western Wyoming and southern Idaho), this proposal would apply to about 16 million acres of inventoried roadless areas. In Utah, with 8 million acres of national forest land, the inventoried roadless areas total more than 4 million acres." Please look up the roadless area maps (www.fs.fed.us/r4), compare them with forest maps, which show thousands of miles of inventoried forest roads within these areas, and request [the regional forester] to reconcile the discrepancies. (Individual, Roy, UT - #2133.64421)

Public Concern: The Forest Service should provide accurate maps of the Inyo National Forest in Volume 2 of the Draft EIS.

There is confusion and misinformation pertaining to the maps that are provided at Volume 2 of the current form of the Draft Environmental Impact statement (DEIS) being circulated. This is particularly true of the information that has been provided for the INF [Inyo National Forest]. The areas allocated to a particular prescription that does not allow road construction or reconstruction is incorrect. (Individual, Mammoth Lakes, CA - #13994.33600)

Public Concern: The Forest Service should clarify the table of contents for Volume 2 of the Draft EIS.

Table of contents for Volume II needs clarification—Are these only maps?? (Individual, No Address - #72.44210)

Public Concern: The Forest Service should clarify whether the farthest-north portion of the Badger-Two Medicine area of the Lewis and Clark National Forest is considered an "inventoried roadless area" on the roadless Draft EIS map.

Recently I noticed that an area thought to be included under "inventoried roadless areas" actually is not mapped as such. The farthest-north portion of the Badger-Two Medicine area of the Rocky Mountain Division of Montana's Lewis & Clark National Forest is not considered an "inventoried roadless area" on the Roadless DEIS map. I'm not sure why that is so, because much of that portion contains no roads. (Individual, Choteau, MT - #2094.33600)

Public Concern: The Forest Service should improve the shading of Figure 3-17 on page 3-50 of the Draft EIS.

The shading of Fig. 3-17 on page 3-50 needs improvement; the legend doesn't seem to match the map. (Individual, Oak Ridge, TN - #53014.33000)

Public Concern: The Forest Service should correct the graphics in the Draft EIS.

Some graphics in the DEIS are blackened (e.g., top graphic, header and portions of tables of alternatives, etc.). (Individual, No Address - #72.44210)

Public Concern: The Forest Service should provide a better representation of mining permissive tracts in the Draft EIS maps.

In contrast to the detailed quantitative minerals analyses undertaken in compliance with the Wilderness Act of 1964, the DEIS "analyzes" the impacts to minerals exploration, development, and production activities on a general nationwide basis. This was necessary due to the limited time frame imposed by senior policy makers in the Administration, including President Clinton, resulting in the fast track of the rulemaking/EIS effort. It was also necessary due to the paucity of information used in the mineral analysis. The Forest Service relied upon USGS maps of geographic provinces identifying areas conducive to existence of undiscovered minerals (so-called permissive tracts). Socioeconomic specialist Report, Energy and Non-energy Minerals at G-12 to G-15. These digital maps were overlain with maps showing the inventoried roadless areas. The Forest Service then displayed the gross value of minerals estimated to be contained in these areas in which roadless areas coincided with permissive tracts…Using a single map of an entire geographic region of multiple states showing permissive tracts of undiscovered mineral deposits combined with a similar scale map of roadless areas results in a GROSS MISUNDERSTANDING of the effects of the proposal upon minerals production and economics. (Individual, Purcellville, VA - #15876.33600)

Public Concern: The tables in the Draft EIS should be scientifically based.

Many tables of comparison of effects contain wording such as "may cause, could increase, and decrease likely." Simply conjectures, and a matter of opinion, not science based. (Individual, Carson City, NV - #669.31000)

Public Concern: The Forest Service should address inaccuracies in tables of the Draft EIS

Tables 2-2 and 2-3-- The table comparing the alternatives and environmental consequences provide an incomplete comparison by omitting certain sections analyzed in Chapter 3, Environmental Consequences. This leads to potential errors in interpreting the full effects of each alternative. RELIEF: The Forest Service must rewrite Tables 2-2 and 2-3 to include all the information disclosed in Chapter 3. (County Elected Official, Basin, WY - #43980.33200)

Table 3-54 is misleading in that it fails to list a number of national forests and communities that will be directly affected by the proposed action. To insure that the public has the opportunity to fully understand the impacts of the proposed action and in turn knowingly comment, a supplemental DEIS should be prepared that discusses all of the affected national forests and communities. The absence of this information in Table 3-54, raises the specter that these communities and forests were not considered in developing the DEIS. (County Agency, John Day, OR - #16087.33300)

Table 3-19 needs to be consistent with Table 3-4. How many miles of planned road construction are reconstruction activities by region? (County Elected Official, Fallon, NV - #17290.31300)

Public Concern: The Forest Service should clarify the data presented in Table 3-20 of the Draft EIS.

Yet another oddity is that the Forest Service claims that 100 percent of the roadless areas in South Dakota are in need of treatment to reduce wildfire threats, and that 71 percent of those acres are at high risk from wildfire. They claim that only five percent of the acres in Montana need to be treated, and that 67 percent are at risk from wildfire. This analysis is extremely confusing. We do not understand how they generated these numbers. It is impossible to provide complete comments on this document in its present form. (Timber Association, No Address - #52501.33300)

Public Concern: The Forest Service should clarify discrepancies between Table 2-2 and page 3-76 of the Draft EIS

In addition, errors occur in calculating the level of timber harvest reductions to assess impacts. On Page 3-76, a reference is made to a 33% reduction in timber harvest levels over other alternatives. A review of Table 2-2 indicates this reduction is 66%. This represents a 50% increase in harvest level reductions. (County Elected Official, Worland, WY - #16185.33300)

Public Concern: The Forest Service should address the data presented in Appendix B.

We are also very confused about the actual acres and areas that will be affected by the proposed rule. For example, the Medicine Bow NF recently published an updated inventory of Roadless Areas as part of the revision of their forest plan. That inventory showed 319,738 acres of inventoried roadless areas on the Medicine Bow NF. However, Appendix B indicates that there are 378,000 acres of "Inventoried Roadless Areas" on the Medicine Bow NF. An example of one reason for this discrepancy is the East Fork Encampment Roadless Area, which was calculated in the new inventory as 7,429 acres; that compares to 11,330 acres for the Coon Creek Roadless Area, as this area was previously named. Our conclusion is that even though the proposed rule is supposed to apply to only the "unroaded portions of inventoried Roadless Areas", in fact, the acreages in Appendix B include "roaded portions of inventoried roadless areas" as well. (Timber Association, Laramie, WY - #15894.33520)

Appendix A Glossary of Acronyms

The following acronyms are used throughout this document. The full titles are listed below for reference purposes.

ADA – Americans with Disabilities Act

AMA – American Motorcycle Association

ANILCA – Alaska National Interest Land Conservation Act

ANCSA – Alaska Native Claims Settlement Act

APA – Administrative Procedures Act

API – Animal Protection Institute

ATV – All Terrain Vehicle

AUM – Animal Unit Month

BLM – Bureau of Land Management

BMP – Best Management Practices

BWCAW – Boundary Waters Canoe Area Wilderness

CAA – Clean Air Act

CARA – Conservation and Reinvestment Act

CBA – Cost–Benefit Analysis

CBD – Convention on Biological Diversity

CEQ – Council on Environmental Quality

CEQA – California Environmental Quality Act

CERCLA – Comprehensive Environmental Response, Compensation and Liability Act

CFR – Code of Federal Regulations (Example: 40 CFR sec.1500)

CFS – Cubic Feet per Second

CITES – Convention on Trade in Endangered Species

COGA – Colorado Oil and Gas Association

COS – Committee of Scientists

CSU – Conservation System Unit

CWA – Clean Water Act

CWAP – Clean Water Action Plan

DEIS – Draft Environmental Impact Statement

DHPA – Division of Historic Preservation and Archaeology

DOD – Department of Defense

DOI – Department of the Interior

EA – Environmental Assessment

EIS – Environmental Impact Statement

EO – Executive Order

EPA – Environmental Protection Agency

ESA – Endangered Species Act

FACA – Federal Advisory Committee Act

FCLAA – Federal Coal Leasing Amendments Act

FEIS – Final Environmental Impact Statement

FEMAT – Forest Ecosystem Management Assessment Team

FLPMA – Federal Land Policy and Management Act

FOIA – Freedom of Information Act

FONSI – Finding of No Significant Impact

FRN – Federal Register Notice

FS – Forest Service

FSM – Forest Service Manual

FWS – Fish and Wildlife Service

FY – Fiscal Year

GAO – General Accounting Office

GCC – Global Climate Change

GIS – Geographic Information Systems

GPS – Global Positioning System

GW – Global Warming

HR – House Resolution (Example: HR 1488, House Resolution 1488)

ICA – Intergovernmental Cooperation Act

ICBEMP – Interior Columbia Basin Ecosystem Management Project

IPCC – Intergovernmental Panel on Climate Change

IR – Interim Rule

IRA – Inventoried Roadless Area

IRFA – Initial Regulatory Flexibility Analysis

IUNC – International Union for the Conservation of Nature and Natural Resources

KIC – Ketchikan Indian Corporation

LRMP – Land Resource Management Plan

LWD – Large Woody Debris

MMBF – Million Board Feet

MMSA – Mammoth Mountain Ski Area

MOU – Memorandum of Understanding

MUSYA – Multiple Use and Sustained Yield Act

NCLUCB – Northern Counties Land Use Coordination Board

NEPA – National Environmental Policy Act

NF – National Forest

NFMA – National Forest Management Act

NFRTA – National Forest Roads and Trails Act

NFS – National Forest System

NGO – Non-Governmental Organization

NHPA – National Historic Preservation Act

NMDA – New Mexico Department of Agriculture

NMFS – National Marine Fisheries Service

NOI – Notice of Intent

NOX – Nitrogen Oxide

NPDES – National Pollution Discharge Elimination System

NPRM – Notice of Proposed Rulemaking

NPS – National Park Service

NRA – National Recreation Area

NRCS – Natural Resources Conservation Service

NTFP – Non-Timber Forest Products

NWMA – Northwest Mining Association

OCRA – Oregon Cascade Recreation Area

OHM – Off-Highway Motorcycle

OHMVR – Off Highway Motor Vehicle Recreation

OHV – Off Highway Vehicle

OMB – Office of Management and Budget

ORV – Off Road Vehicle

OSB – Oriented Strand Board

OWA – Oregon Wilderness Act

PGE – Platinum Group Element

PILT – Payment in Lieu of Taxes

PRA – Paperwork Reduction Act

PRCP – Purchaser Road Credit Program

PTS – Payment to the States

PU – Passive Use

PVOA – Petersburg Vessel Owners Association

QLG – Quincy Library Group

RA – Roadless Area

RAC – Range Advisory Council

RAC – Roadless Area Conservation

RARE I and II – Roadless Area Review and Evaluation

RCIP – Riverside County Integrated Project

RFA – Regulatory Flexibility Act

RFA – Regulatory Flexibility Analysis

RIF – Reduction in Force

RIM – Recreation Information Management

RMR – Road Management Rule

RNA – Research Natural Area

ROD – Record of Decision

ROG – Reactive Organic Gases

ROS – Recreation Opportunity Spectrum

RPA – Resources Planning Act

RS – Revised Statute

RV – Recreational Vehicle

SAF – Society of American Foresters

SB – Senate Bill

SBA – Small Business Administration

SBREFA – Small Business Regulatory Enforcement Fairness Act

SDEIS – Supplemental Draft Environmental Impact Statement

SMA – Special Management Area

SMCRA – Surface Mining Control and Reclamation Act

SMS – Scenic Management System

SNRA – Sawtooth National Recreation Area

SNOTEL – Snow pack Telemetry

SPB – Southern Pine Beetle

SRNRA – Smith River National Recreation Area

SUD – Surface Use Determination

SUP – Special Use Permit

SUV – Sports Utility Vehicle

SVRA – State Vehicular Recreation Area

TBNG – Thunder Basin National Grassland

TCP – Traditional Cultural Places

T&E – Threatened and Endangered

TLMP – Tongass Land Management Plan

TMDL – Total Maximum Daily Load

TSPIRS – Timber Sales Program Information and Reporting Service

TTRA – Tongass Timber Reform Act

UMRA – Unfunded Mandates Reform Act

UNEP – United Nations Environmental Program

USC – United States Code

USDA – United States Department of Agriculture

USDC – United States District Court

USFS – United States Forest Service

USGS – United States Geological Survey

VDOT – Virginia Department of Transportation

VER – Valid Existing Right

VQO – Visual Quality Objective

WINI – Watershed Improvement Needs Inventory

WPSA – White Pass Ski Area

WRAP – Western Regional Air Partnership

WSA – Wilderness Study Area

WSGS – Wyoming State Geological Survey

W/UI – Wild/Urban Interface

WWA – Washington Wilderness Act

WWA – Wyoming Wilderness Act

WYDOT – Wyoming Department of Transportation

Appendix B Requests for Inclusion or Exemption of Specific Areas

Table B-1. Requested Inclusions Under the Proposed Rulemaking.

Region 1 Northern

AREA	NATIONAL FOREST OR GRASSLAND	STATE
The state of Idaho (Individual, Boise, ID - #6033.10200)	Multiple	ID
Roadless areas in Idaho (Individual, Olga, WA - #16638.10110)	Multiple	ID
Inventoried and uninventoried roadless areas (including those encompassed in the Northern Rockies Ecosystem Protection Act) (Individual, Bemidji, MN - #7964.64351)	Multiple	ID, MT
Roadless areas in Montana (Individual, Olga, WA - #16638.10110)	Multiple	MT
Pioneer Scenic Byway in southwest Montana (Individual, Butte, MT - #50515.64351)	Beaverhead	MT
West Big Hole area (Individual, Minneapolis, MN - #2892.83000)	Beaverhead	MT
Selway-Bitterroot Wilderness, along the Selway River, and the Anaconda-Pintler Wilderness, at Johnson lake, the Pioneer Mountains in the Beaverhead-Deerlodge National Forest and the Great Bear Wilderness (Individual, Missoula, MT - #16940.90200)	Beaverhead-Deerlodge, Bitterroot	MT
CLEARWATER NATIONAL FOREST: NORTH FORK COUNTRY- MALLARD-LARKINS--1300 (also on the Idaho Panhandle National Forest)….encompasses most of the high country between the St. Joe and North Fork Clearwater Rivers….a low elevation section of the North Fork Clearwater….Logging sales (Lower Salmon and Dworshak Blowdown) …a potential wild and scenic river section of the North Fork... THE GREAT BURN--1301 (or Hoodoo also on the Lolo National Forest) … harbors the incomparable Kelly Creek and includes its confluence with Cayuse Creek. This area forms a major headwaters for the North Fork of the Clearwater. …Fish Lake… the Jap, Siam, Goose and Shell Creek drainages WEITAS CREEK--1306 (Bighorn-Weitas)…Weitas Creek…North Fork Clearwater. Upper Cayuse Creek … POT MOUNTAIN--1304 SIWASH--1303 MOOSE MOUNTAIN--1305 MEADOW CREEK/VANDERBILT AND RAWHIDE--1302 and 1313 (also Idaho Panhandle and Lolo National Forests) This is wild headwaters of both the North Fork proper and the St. Joe Rivers with isolated mountain lakes like Trail, Oregon,	Bighorn, Clearwater, Idaho Panhandle, Lolo	ID, MT, WY

AREA	NATIONAL FOREST OR GRASSLAND	STATE
and St. Joe Lakes. Closure of unneeded and deteriorating road 5428 was suggested to unite this area with the Rawhide roadless area in the Clearwater Forest Plan…. ELDORADO CREEK--1312 SELWAY-MIDDLE FORK CLEARWATER These roadless areas drain into the Selway and Middle Fork Clearwater…. O'HARA FALLS--1226. O'Hara Creek. GODDARD CREEK-1843…between O'Hara Falls and Middle Fork Face. … MIDDLE FORK FACE --1842. …The Middle Fork sale … CLEAR CREEK-1844 LOWER SALMON These areas drain into the Salmon River…They form a transition between the Salmon River country to the east and the Blue Mountains to the west….The Slate Creek road NORTH FORK SLATE-1850. Slate Creek LITTLE SLATE-1851...tributaries to Slate Creek…lake in Nut Basin and an RNA in No Business Creek… JOHN DAY-1852….John Day and Allison Creeks…. KELLY MOUNTAIN-1857. This area drains into the Salmon east of Riggins…. IDAHO PANHANDLE NATIONAL FOREST: (only portions in the greater Salmon Selway Ecosystem, mainly the upper St. Joe River drainage are listed--others should be protected) MOSQUITO FLY--1150 MIDGET PEAK--1151. This area borders the St. Joe River….Simmons Creek SHEEP MOUNTAIN/STATE LINE (ALSO LOLO NATIONAL FOREST)--1799 …near the headwaters of the St. Joe River. …Many higher peaks dot the landscape, on and off the Bitterroot Crest. GRANDMOTHER MOUNTAIN-1148. …Widow Mountain. Much of the area is managed by the BLM and a corner of it drains into the St. Maries River. (Environmental/Preservation Organization, Moscow, ID - #28913.64351)		
SELWAY-BITTERROOT ADDITIONS WHITE SAND CREEK, NORTH FORK--1309… important buffer zone to Beaver Creek as the forest plan roadless boundary goes right to the Creek….in the upper Lochsa… SNEAKFOOT--1314…Along with White Sand and part of the Lochsa Face… LOCHSA FACE--1311. This is the steep face of the Lochsa River adjacent to the Selway-Bitterroot Wilderness. It contains the famous Jerry Johnson Hot Springs and important tributaries to the Lochsa River… RACKCLIFF-GEDNEY LOLO--1805 … encompasses the north flank of Lolo Peak, the northern boundary of the Selway-Bitterroot Wilderness.	Bitterroot, Clearwater, Lolo, Nez Perce	ID, MT

AREA	NATIONAL FOREST OR GRASSLAND	STATE
SECTION 16 ROADLESS--1310…adjacent to the Selway-Bitterroot Wilderness and just south of the Lolo Creek area. SELWAY-BITTERROOT ADDITIONS These are all logical additions to the Selway Bitterroot Wilderness. A portion of Meadow Creek was previously included in the old Selway Primitive Area…. MEADOW CREEK--1845.…Meadow Creek is the major tributary to the Selway River… RACKCLIFF-GEDNEY--1841.…occupies the divide between the Lochsa and Selway Rivers…. UPPER BEAR CREEK.…the headwaters of Bear Creek, contiguous to the Selway Bitterroot Wilderness and at the top of Lost Horse Canyon. It should be part of the Selway-Bitterroot Wilderness…. SILVER CREEK-PILOT KNOB--1849…Pilot Rock… DIXIE SUMMIT/NUT HILL--1235 LICK POINT--1227. This is the headwaters of the American River… (Environmental/Preservation Organization, Moscow, ID - #28913.64411)		
HELLS CANYON ADDITIONS KLOPTON CREEK/CORRAL CREEK AND BIG CANYON A-1854 AND 1853 (Hells Canyon NRA). … they are inventoried roadless areas under the jurisdiction of the HCNRA, managed by the Wallowa-Whitman National Forest. … SALMON FACE-1855. …adjacent to the Hells Canyon Wilderness. RAPID RIVER-1922 (also Payette National Forest) (Environmental/Preservation Organization, Moscow, ID - #28913.64411)	Bitterroot, Clearwater, Nez Perce, Payette, Wallowa-Whitman	ID, MT, OR
Sapphires Wilderness Study Area (Environmental/Preservation Organization, Bozeman, MT - #15895.91612)	Bitterroot	MT
Sapphires, Big Hole, Pioneers and Badger Two Medicine. (Environmental/Preservation Organization, Bozeman, MT - #15895.91612)	Bitterroot, Flathead, Gallatin, Lewis and Clark	MT
NORTH LOCHSA COUNTRY This is the northern flank of the scenic Lochsa River… Indian Post Office, high above the Lochsa…. FISH AND HUNGRY CREEK--1307 (also called North Lochsa Slope).…north central Idaho and crucial wildlands north of Highway 12, the Lochsa River corridor. It also contains the only unroaded section of the Lewis and Clark Trail remaining in the entire country WEIR/POST OFFICE--1308….Ashpile Peak and Weir Creek Hot springs and is adjacent to Indian Post Office. (Environmental/Preservation Organization, Moscow, ID - #28913.64411)	Clearwater, Lewis and Clark	ID, MT
Lost Water Canyon in the Pryor Mountains (Individual, Billings, MT - #940.64350)	Custer	MT
Fred Burr/Discovery Roadless Area (Individual, Boulder, MT - #27142.64353)	Deerlodge	MT

AREA	NATIONAL FOREST OR GRASSLAND	STATE
Whitetail, Haystack, and O'Neil Creek Roadless areas (Individual, Boulder, MT - #4857.10100)	Deerlodge	MT
Tuchuck Mountain, Mt. Thoma and Hefty, Mt. Thompson Seton, Nasukoin, Crinkle Horn, Krag Peak, and Mt. Lock, Montana (Individual, Sandpoint, ID - #8896.64411)	Flathead	MT
Swan Range, the Badger-Two Medicine, and LeBear (Individual, Whitefish, MT - #10221.90200)	Flathead, Lewis and Clark	MT
Gallatin National Forest (Recreational Organization, Duluth, MT - #28930.91610)	Gallatin	MT
Crazy Mountains of south-central MT (Individual, Bozeman, MT - #2782.64350)	Gallatin	MT
Land received from Big Sky Lumber Company in the Gallatin National Forest (Environmental/Preservation Organization, Bozeman, MT - #16097.64354)	Gallatin	MT
Hyalite-Porcupine-Buffalo Horn Wilderness Study Area bordering Yellowstone National Park (Gallatin National Forest) …Rock Creek Trail #178 (Livingston Ranger District) (Environmental/Preservation Organization, Bozeman, MT - #15895.91612)	Gallatin	MT
Black Mountain Roadless Area near Helena, Montana (Individual, Helena, MT - #26881.90200)	Helena	MT
Devil's Tower, Gates of the Mountains, and Silver King Falls Creek…Lewis and Clark County, Montana (County Agency, Helena, MT - #10109.83000)	Helena, Lewis and Clark	MT
Panhandle National Forest (Individual, Chattaroy, WA - #5248.83100)	Idaho Panhandle	ID
East Fork of Big Creek [in the Coeur d'Alene mining district] (Individual, Osburn, ID - #2887.10100)	Idaho Panhandle	ID
Long Canyon in the Bonners Ferry District (Individual, Morro bay, CA - #19486.10100)	Idaho Panhandle	ID
Upper St. Joe River area (Individual, Hayden Lake, ID - #8885.92300)	Idaho Panhandle	ID
Long Canyon in the American Selkirks and the peaks and lakes of Selkirk Crest (Recreational Organization, Bonners Ferry, ID - #10182.64351)	Idaho Panhandle	ID
Kootenai National Forest (Individual, Heron, MT - #18002.90200)	Kootenai	MT
The Yaak in northwestern Montana (Individual, Belgrade, MT - #5624.10100)	Kootenai	MT
Yaak Valley, Montana (Individual, No Address, - #7819.64351)	Kootenai	MT
Northwest Peaks, Mount Henry, Roderick, Gold Hill, Scotchman Peaks, Trout Creek, Galena, Caterak, Cubiron, Mount Bushnel (Individual, Kalispell, MT - #25391.64351)	Kootenai	MT
Elk Calf Mountain, South Fork Two Medicine, Mt. Pablo, upper Hyde Creek, Kiyo Crag, Half dome (Individual, Choteau, MT - #2094.64351)	Lewis and Clark	MT
Big Snowies, the Middle Fork of the Judith, Teton Peaks, and Badger Two Medicine	Lewis and Clark, Flathead	MT

AREA	NATIONAL FOREST OR GRASSLAND	STATE
(Individual, Ft. Shaw, MT - #2774.10100)		
NEZ PERCE NATIONAL FOREST: RIVER OF NO RETURN/GOSPEL HUMP ADDITIONS These roadless areas are contiguous to the River of No Return and Gospel Hump Wilderness Areas…the closure of the unneeded Magruder Road would unite this largest wildland in the lower 48 with the Selway-Bitterroot and surrounding wildlands. COVE AND MALLARD--1921 and 1847….site of the infamous Cove/Mallard timber sales.…part of the Salmon River country… GOSPEL HUMP ADDITIONS …site of the Wing Creek/Twentymile Roadless Area (South Fork Clearwater drainage)…Tenmile and Johns Creeks….Otter-Wing and Mackey Day Timber…include Indian Creek (southeast portion) which is a crucial tributary to the Salmon River, Boulder Creek (west), and the remaining roadless portion of the upper Crooked River (northeast). Furthermore, a roadless portion of upper Twentymile Creek (Lost Lake and Twentymile Butte) was assumed to be in the Gospel Hump Wilderness in the RARE II final EIS. (Environmental/Preservation Organization, Moscow, ID - #28913.64411)	Nez Perce	ID
Include Hells Canyon west rim at Lord Flat. (Individual, Idaho Falls, ID - #15427.91610)	Nez Pierce, Payette, Wallowa- Whitman	ID, OR

Region 2 Rocky Mountain

AREA	NATIONAL FOREST OR GRASSLAND	STATE
The state of Idaho (Individual, Boise, ID - #6033.10200)	Multiple	ID
Routt, Rio Grande, and Arapaho-Roosevelt National Forests -- as well as the Black Hills National Forest in South Dakota and Wyoming …[Protect from] Timber sales that will invade the Bushy Creek, Morrison Creek, and South Fork Roadless Areas on the Routt, and the Beaver Park Roadless Area in the Black Hills… (Environmental/Preservation Organization, Nevada City, CA - #50392.64352)	Arapaho-Roosevelt, Black Hills, Rio Grande, Routt	CO, SD, WY
Sand Creek, Inyan Kara, and Beaver Park (Individual, Belle Fourche, SD - #6756.10110)	Black Hills	SD
Add six areas to Black Hills National Forest inventoried roadless area: Black Elk Additions, Black Fox, Castle Creek, Pilger Mountain, Stagebarn Canyons and Crow Peak. (Environmental/Preservation Organization, Rapid City, SD - #10681.21200)	Black Hills	SD
The Black Elk Addition in the Black Hills particularly needs this help.…areas in the National Grasslands, including Conata	Black Hills	SD

AREA	NATIONAL FOREST OR GRASSLAND	STATE
East and West be inventoried and protected. (Individual, Piedmont, SD - #25885.64351)		
Sand Creek, an area in northeastern Wyoming, has 9,948 acres of inventoried roadless area in the Black Hills (Environmental/Preservation Organization, No Address, - #22030.64150)	Black Hills	WY
Thunder Basin, Grand River, Cedar River, and Cheyenne National Grasslands, Nebraska National Forest (Individual, Laramie, WY - #25484.64351)	Cedar River, Thunder Basin, Grand River, and Cheyenne National Grasslands, Nebraska	ND, NE, SD, WY
ALL ROADLESS AREAS identified in Appendix C to the Northern Great Plains Management Plans Revision draft EIS (including 31,360 acres of the Grand River National Grassland, 38,920 acres of the Thunder Basin National Grassland, and 130,000 acres of the Nebraska National Forest) (Environmental/Preservation Organization, Rapid City, SD - #10681.21200)	Custer, Grand River and Thunder Basin National Grasslands, Nebraska, Medicine Bow-Routt	CO, NE, MT, SD, WY
The northern Wets, the west side of Spanish Peaks, and the Collegiates (Individual, Pueblo, CO - #605.64130)	Grand Mesa-Uncompahgre-Gunnison, Pike-San Isabel	CO
Dome Peak (White River National Forest), Salt Creek & Priest Mountain (Grand Mesa National Forest) and Morrison Creek & Troublesome (Routt National Forest). (Individual, Lakewood, CO - #7772.64351)	Grand Mesa, Routt, White River	CO, WY
The Laramie District…the area south of Libby Creek between Silver Run Lake on the west, the ridge above the junction of Elin Road, which is Forest Service 338, and Highway 130 on the east, and Gold Run Creek on the south….It lies within an even greater roadless area of about 10,500 acres when extended west to the Forest Service Road 336, the Libby Flats Road….It drains into Libby Creek either directly or via Silver Run Creek and Gold Run Creek….beginning under Medicine Bow Peak to Barber -- down to Barber Lake picnic areas (Individual, Laramie, WY - #21749.64351)	Medicine Bow	WY
Routt National Forest (Individual, Golden, CO - #12935.64350)	Routt	CO, WY
San Isabel National Forest (Individual, Nathrop, CO - #44175.10110)	San Isabel	CO
HD Mountains of the San Juan National Forest in southwestern Colorado (Individual, Durango, CO - #25789.93540)	San Juan	CO
Fish Creek, Hermosa, HD Mountains (Individual, Durango, CO - #25789.64420)	San Juan	CO
Hermosa Creek Roadless Area right outside of Durango (Individual, No Address - #21290.92300)	San Juan	CO
Sunlight Basin in the Shoshone National Forest (Individual, Powell, WY - #13653.10110)	Shoshone	WY
Copper and Beaver Creek in Colorado (Individual, Boulder, MT - #27142.64353)	White River	CO

Region 3 Southwestern

Also roadless areas in Arizona (Individual, Olga, WA - #16638.10110)	Multiple	AZ
All 1.5 M. acres of roadless acres in Arizona should be included, not just 1.1 M. inclusion of areas 4,900 - 1,000 A should be included or a certain date set to consider their inclusion; all non-inventoried areas should be required to be surveyed and, if qualifying, retroactively under this rule… (Environmental/Preservation Organization, Tempe, AZ - #18237.64351)	Multiple	AZ
The Blue Range Primitive Area on the Apache-Sitgreaves NF; areas around Mt. Graham on the Coronado NF; flanks of the Kaibab Plateau on the Kaibab NF; and the House Mountain south of Sedona on the Coconino NF (Individual, No Address - #2245.64150)	Apache-Sitgreaves, Coconino, Coronado, Kaibab	AZ
Latir Peak additions, Comales Creek, Sierra Negra, Canjilon Peak and the area north of Jicarita Peak (Individual, Santa Fe, NM - #13825.91000)	Carson	NM
Include San Francisco Peaks near Flagstaff, AZ (Individual, Scottsdale, AZ - #18481.92100)	Coconino, Kaibab	AZ
Peloncilo Mountains and the Mt. Graham roadless complex in the Coronado N.F., Jacko Canyon, Padre Canyon and House Mountain on the Coconino N.F., Willis Canyon, Burre Canne, Big Ridge, Red Point and the Coconino Rim in the Kaibab N.F., and the roadless lands contiguous and adjacent to the Blue Range Primitive Area. (Individual, Chandler, AZ - #17552.10100)	Coconino, Coronado, Kaibab	AZ
The Santa Rita Mountain Range of the Coronado NF (Individual, Green Valley, AZ - #2137.64420)	Coronado	AZ
Devil's Creek, New Mexico. (Individual, Albuquerque, NM - #14508.64422)	Gila	NM
Eagle Peak Roadless Area (Environmental/Preservation Organization or Association, Tucson, AZ - #13510.93300)	Gila	NM
Matzatzal Mountains, Sierra Ancha Mountains, White Mountains, Goldfield Mountains, Arizona (Individual, Mesa, AZ - #6784.64420)	Tonto	AZ
McDowell Sonoran Preserve corridor between Tonto National Forest and the McDowell Mountains and the County Regional Park near Scottsdale, Arizona (Town or Municipality, Scottsdale, AZ - #51129.64351)	Tonto	AZ
All along the road to Four Peaks The areas just west of First Water and east of the Apache Trail Areas south & west of Superior (Individual, Glendale, AZ - #18652.91610)	Tonto	AZ

Region 4 Intermountain

AREA	NATIONAL FOREST OR GRASSLAND	STATE
Roadless areas in Idaho (Individual, Olga, WA - #16638.10110)	Multiple	ID
Roadless areas in Utah (Individual, Olga, WA - #16638.10110)	Multiple	UT
Include the Southern Idaho Batholith. (Individual, Boise, ID - #16046.83400)	Multiple	ID
Include Congressionally-designated areas as the Hells Canyon National Recreation Area, the Newberry National Volcanic Monument, the Oregon Cascades Recreation Area, and federal lands within the Columbia River Gorge Scenic Area and Wild and Scenic River corridors. (State Elected Official, Salem, OR - #18661.64351)	Multiple	ID, OR, WA
114,000-acre inventoried roadless area at the headwaters of Lime Creek and other Boise River tributaries in the Soldier Mountains of southeastern Idaho (Environmental/Preservation Organization, Boise, ID - #13634.10100)	Boise, Sawtooth	ID
Boulder White Clouds, Lost River Range, Boise and Payette River Basins (Individual, Fullerton, CA - #725.10100)	Boise, Challis, Payette, Sawtooth	ID
Roadless areas in the Bridger-Teton National Forest (Recreational Organization, Jackson, WY - #10854.64351)	Bridger-Teton	WY
Areas in the Greater Yellowstone Ecosystem, especially in the Gallatin Range… (for example, Yellowstone National Park, Absaroka-Beartooth Wilderness, and Lee Metcalf Wilderness) and the neighboring important habitat areas of the Gallatin Range, the Tobacco Roots, and the Crazy Mountains. (Individual, Bozeman, MT - #7694.64351)	Bridger-Teton, Custer, Gallatin, Shoshone, Targhee	ID, MT, WY
Caribou City and Stump Creek Roadless areas …portions of the Big Belts and Continental Divide (Environmental/Preservation Organization, Bozeman, MT - #15895.91612)	Caribou	ID, WY
Boulder Mountain on the Dixie NF. La Sal and Abajo Mountains, on the Manti-La Sal. Black Mountain, Heliotrope, or Twelvemile Roadless Areas on the Manti-La Sal The White Pine, Mineral Fork/Days Fork, Mt. Olympus, and Mt. Aire Roadless Areas in the Wasatch-Cache NF The Lakes Roadless Area of the High Uintahs Wilderness (Individual, Salt Lake City, UT - #26836.64351)	Dixie, Manti La Sal, Wasatch-Cache, Uintah	UT
Humboldt-Toiyabe (Individual, Reno, NV - #13260.92200)	Humboldt- Toiyabe	NV
Jarbidge, NV (Individual, CA - #3732.71300)	Humboldt-Toiyabe	NV
Schell Creeks, the Toiyabe Crest, and the Excelsiors (Environmental/Preservation Organization, Reno, NV - #43946.90240)	Humboldt-Toiyabe	NV
Grant Range and Clement Mountains, Schell Creek (Environmental/Preservation Organization, Nevada City, CA -	Humboldt-Toiyabe	NV

AREA	NATIONAL FOREST OR GRASSLAND	STATE
#50392.64351)		
The White Rim/Ruin Canyon area in the Abajos Mountains (Individual, Chicago, IL - #5625.64150)	Manti La Sal	UT
The roads are so bad in Yellowstone Park, [that it seems that] perhaps that should be made into a roadless area [as well]. (Individual, Canby, OR - #14154.90000)	Yellowstone National Park	WY

Region 5 Pacific Southwest

AREA	NATIONAL FOREST OR GRASSLAND	STATE
Forests in northwestern California (Environmental/Preservation Organization, Davis, CA - #29925)	Multiple	CA
San Joaquin Roadless Area include: The spectacular San Joaquin Ridge, which forms the eastern border of the Ansel Adams Wilderness…the Ritter Range… Glass Creek Meadow, the largest subalpine meadow in the central Eastern Sierra. …. An extensive system of natural springs and seeps in the cirques below San Joaquin Ridge.….The hydrological system in the San Joaquin Roadless Area forms the headwaters of the Owens River, and may be connected to Big Springs. Protection of the Owens River headwaters is critical to protecting the integrity of the downstream fishery in the Upper Owens River. Glass Creek is also a candidate Wild & Scenic River, nominated by the Forest Service. White Wing Mountain, a Forest Service-recommended Research Natural Area (RNA)…. Yost Meadow and Yost Lake…White Mountains, 40 miles to the east…. and Fern Lake trails… (Environmental/Preservation Organization, Lee Vining, CA - #15878.80000)	Multiple	CA
In Eastern California--the White Mountains, San Joaquin Ridge, and the Hoover Additions in Mono County and the Freel Peak-Horsethief Area and the Carson Iceberg Additions in Alpine County. (Individual, Reno, NV - #43623.64351)	Multiple	CA
Yosemite… National Parks including Pacific Crest Trail, (Individual, Los Angeles, CA - #6722.92300)	Multiple	Multiple
National Forest just north of Los Angeles (Individual, Lancaster, CA - #14638.91500)	Angeles	CA
The Trabuco District…in Orange County and adjacent countries…Please protect the Cleveland National Forest… (Environmental/Preservation Organization, Costa Mesa, CA - #30393.83000)	Cleveland	CA
Cleveland NF, CA: (middle part) lands west and south. IRA not allowing roads; northern part) lands north & west of IRA not allowing roads…. (middle part) lands just east of Aqua Tibia Wilderness; (northern part) lands northeast of San Mateo Canyon Wilderness.	Cleveland, Inyo, Lake Tahoe Basin Management Unit, San Bernardino	CA, NV

AREA	NATIONAL FOREST OR GRASSLAND	STATE
Inyo NF, CA: (western part) all lands west of 395 between Lone Pine and the northern boundary; eastern part) all lands from east of Big Pine to White Mountain Lake Tahoe Basin, MU, CA: (western part) land between Granite Chief Wilderness and the word "Lake." And I urge that the following lands be shifted from IRA allowing or not allowing roads to wilderness…(western part) land between Granite Chief Wilderness and the words "Basin M.U."; (southern part) the land south of Hwy 89 San Bernardino NF, CA: (southern part) IRA allowing roads immediately adjacent to west of the Santa Rosa Wilderness lands southeast of San Jacinto Wilderness (Individual, Seattle, WA - #18206.64411)		
The American River Canyon Roadless Area (Individual, Gold River, CA - #13461.10110)	El Dorado	CA
As for western Granite Chief, this area physically connects the existing Granite Chief Wilderness to Duncan Canyon. Along the Western States Trail, this section includes the most magnificent vistas, where the trail clings to the ridge top separating the North and Middle Fork American River Canyons…. Additionally, the lower American River Canyons (El Dorado and North Fork of the Middle Fork) …These areas deserve protection not only for their scenery, but also their historical importance as the environment of the National Register-listed Last Chance to Michigan Bluff section of the Western States Trail. (Business, San Francisco, CA - #43354.64351)	El Dorado, Tahoe	CA
Mammoth Mountain and June Mountain (Individual, Mammoth Lakes, CA - #43478.93720)	Inyo	CA
Sherwin and Mammoth/June in California, and Snowbird in Utah. (Individual, Salt Lake City, UT - #18900.64353)	Inyo, Wasatch-Cache	CA, UT
The Sherwin Roadless Area The San Joaquin Roadless area …It contains the headwaters of the Owens River, which is the major source of water for the City of Los Angeles. (Individual, Mammoth Lakes, CA - #43478.90200)	Inyo, Sierra	CA
San Joaquin Ridge/Ansel Adams Wilderness (Inyo, Sierra), Mt. Eddy at headwater of Sacto River, Chinquapin and South Fork roadless areas along So. Fork Trinity River. (Individual, Carmel, CA - #3582.64240)	Inyo, Sierra	CA
Lake Tahoe Basin including Freel and Meiss roadless areas (Environmental/Preservation Organization, South Lake Tahoe, CA - #43604.64351)	Lake Tahoe Basin Management Unit, Tahoe	CA
Lassen National Forest….Thousand Lakes Wilderness and Lassen National Park…Prospect Peak area NE of Lassen…Lassen Peak area. (Individual, Arlington, VA - #13240.84610)	Lassen	CA
Ventanna Wilderness (Individual, Carmel, CA - #51956.64350)	Los Padres	CA
Three National Forests in California; Sierra, Mendocino, and	Mendocino, Sierra,	CA

AREA	NATIONAL FOREST OR GRASSLAND	STATE
Stanislaus (Individual, Tucson, AZ - #17850.90230)	Stanislaus	
Modoc National Forest. The remaining roadless areas on the flanks of Medicine Lake volcano should remain roadless, including those east of Lava Beds National Monument and all of the roadless area NW of Medicine Lake itself and that of the Burnt Lava Field area. (Individual, Arlington, VA - #13240.84610)	Modoc	CA
Oceano Dunes SVRA. (Individual, Nipomo, CA - #15947.91610)	Oceano Dunes State Vehicular Recreation Area	CA
Mt. Ashland [protect from] ski expansion, which threatens the McDonald Peak roadless area (Environmental/Preservation Organization, Ashland, OR - #13522.64353)	Rogue River	CA
The Rogue River (Individual, Jacksonville, OR - #1891.64150)	Rogue River, Siskiyou	OR
Giant Sequoia National Monument and the Rincon, Woodpecker, and South Sierra Roadless Areas, Kern River (Environmental/Preservation Organization, Tehachapi, CA - #51596.64351)	Sequoia	CA
Shasta-Trinity National Forest. The remaining small roadless areas adjacent to Mount Shasta Wilderness… (Individual, Arlington, VA - #13240.84610)	Shasta-Trinity	CA
Mt. Eddy (Individual, Mount Shasta, CA - #2117.64351)	Shasta-Trinity	CA
The Kalmiopsis, Siskiyou, and Grassy Knob-Copper Salmon wildlands (Individual, W. Islip, NY - #3999.64350)	Siskiyou	CA, OR
Rough and Ready Creek (Siskiyou National Forest), Copper Salmon (Siskiyou National Forest) (Environmental/Preservation Organization, Ashland, OR - #13106.64351)	Siskiyou	CA, OR
Eagle Roadless Area, Stanislaus National Forest. (Individual, Modesto, CA - #18987.64351)	Stanislaus	CA
In addition, the Tuolumne River Roadless area contains the lower canyon of the Clavey River, the Tuolumne's most pristine tributary and one of three undammed rivers in the Sierra Nevada. (Environmental/Preservation Organization, Twain Harte, CA - #44197.90200)	Stanislaus, Yosemite National Park, Bakersfield BLM	CA
Middle Fork Eel, Tuolomne, North Fork Kern, Kings, McCloud, Klamath, and Trinity Rivers. (Environmental/Preservation Organization, Sacramento, CA - #29262.91000)	Stanislaus, Yosemite National Park, Bakersfield BLM	CA
There are three inventoried roadless areas within the Tuolumne's watershed: Bell Meadow, North Mountain and Tuolumne River. (Environmental/Preservation Organization or Association, Twain Harte, CA - #44197.83000)	Stanislaus, Yosemite National Park, Bakersfield BLM	CA
Bell Meadow, Sonora Pass, North Mountain, and areas of the North Fork Stanislaus River Canyon (Individual, Bear Valley, CA - #6158.64351)	Stanislaus	CA

Region 6 Pacific Northwest

AREA	NATIONAL FOREST OR GRASSLAND	STATE
Oregon's Westside forests (Individual, Eugene, OR - #157.83520)	Multiple	OR
Also roadless areas in Oregon (Individual, Olga, WA - #16638.10110)	Multiple	OR
Protect National Forests east of Lowell, Oregon (Individual, Eugene, OR - #40073)	Multiple	OR
Roadless areas in the state of Washington (Individual, Seattle, WA - #10788.64351)	Multiple	WA
The east and west sides of the Cascades (Individual, Klamath Falls, OR - #59450.10100)	Multiple	OR, WA
The Pacific Northwest (Environmental/Preservation Organization, Davis, CA - #29925)	Multiple	OR, WA
Include Bull Run Roadless Areas, Oregon Dunes NRA, Hells Canyon NRA… (Environmental/Preservation Organization, Eugene, OR - #29922.64351)	Multiple	ID, OR
Colville and on all national Forests (Individual, Superior, WI - #1682.64352)	Colville	WA
Twin Sisters Roadless area (Environmental/Preservation Organization, Republic, WA - #29013.91612)	Colville	WA
Include Colville, Wallowa-Whitman, and Winema, Malheur, Ochoco, and Umatilla, Kangaroo roadless area on the Klamath, Rogue River and Siskiyou National Forests, and Sturgis Fork of Carberry Creek and Mt. Ashland ski area (Environmental/Preservation Organization, Williams, OR - #29923.64351)	Colville, Wallowa-Whitman, Winema, Malheur, Ochoco, Umatilla, Klamath, Rogue River and Siskiyou	OR, WA
Methow headwaters (Okanogan NF), Barclay and Eagle Lakes (Mt. Baker-Snoqualmie NF), the Entiat (Wenatchee NF), Dark Divide (Gifford Pinchot NF), Kettle Range (Colville NF), Upper Tucannon (Umatilla NF), and S. Quinalt Ridge area (Olympic NF). (Individual, Olga, WA - #16638.10110)	Colville, Gifford Pinchot, Okanogan, Mt. Baker-Snoqualmie, Olympic, Umatilla, Wenatchee	WA
Kettle River Range along Mad River, The Meadows Colville NF: Kettle River Range (Bald-Snow, Thirteenmile, Profanity, Hoodoo canyon) areas adjacent to the Salmo-Priest Wilderness, Abercrombie, Hooknose, Grassy Top, Harvey Creek, Dry Canyon Breaks, Kettle Crest Gifford Pinchot: Goat Rocks, Mt. Adams, William O. Douglas, Indian Heaven, Tatosh and Trapper Creek Wilderness Areas; Dark Divide, Siouxon, Big Lava Bed, Silver Star Mt., Pompey Peak Mt. Baker-Snoqualmie Alpine Lakes, Henry M. Jackson, Glacier Peak, Mt. Baker, Clearwater, Norse Peak, Boulder River, Noisy-Diosbud Wilderness Areas, Eagle Rock, Ragged Ridge, Mt. Dickerman,	Colville, Gifford Pinchot, Idaho Panhandle, Mt. Baker-Snoqualmie, Okanogan, Olympic, Umatilla, Wenatchee	WA, ID

AREA	NATIONAL FOREST OR GRASSLAND	STATE
Higgins Mountain, Pressentin Creek, Alpine Lakes Wilderness Area, Pratt River/Middle Fork Snoqualmie, Mt. Index/North Fork Tolt, Taylor River, Miller River, Maloney Ridge, and Mason Creek, land exchanges along I-90, Kelly Butte Okanogan NF: Pasayten, Lake Chelan-Sawtooth Wilderness Areas, along the North Cascades Scenic Highway corridor; Golden Horn, Foggy Dew, Tiffany Mountain, Long Swamp, The Meadows-Twentymile/Thirtymile, and Okanogan Highlands (Mt. Bonapart, Clackamas Mountain, Bodie Mountain, Jackson Creek), Cedar Creek Olympic NF: Buckhorn, The Brothers, Mt. Skokomish, Wonder Mountain, Colonel Bob Wilderness Areas and Olympic National Park, South Quinault Ridge and South Fork Skokomish River, Lena Lake, Mt Townsend, Mt. Zion and Jefferson Ridge Umatilla NF: Wenaha-Tucannon Wilderness Area, Tucannon River Wenatchee NF: Lake Chelan-Sawtooth, Glacier Peak, Alpine Lakes, Henry M. Jackson, William O. Douglas, Goat Rocks, Norse Peak, Devil's Gulch, Nason Ridge, Mad River-Chelan Mountains, Glacier Peak Wilderness, Teanaway River, Manastash Ridge) Idaho Panhandle NF: Salmo-Priest Wilderness Area, Grassy Top, South Fork Mountain, Hungry Mountain-North Baldy (Environmental/Preservation Organization, Seattle, WA - #48898.64351)		
Deschutes National Forest. The area around Bend including the Cascade Lakes highway …in the Tumalo Mountain roadless area north of Mount Bachelor and in the large roadless area west and south of the volcano …Mount Bachelor… the Bachelor-Kwol Butte volcanic chain…roadless area east of the Cascade crest north of Odell Lake should remain roadless to be compatible with the assignment on the other side of the crest in Willamette National Forest …crest of Cascade Range …Deschutes National Forest …The small roadless areas adjacent to Newberry Volcanic Monument …areas around Cultus Lake (Individual, Arlington, VA - #13240.84610)	Deschutes, Willamette	OR
Protect Gifford Pinchot National Forest (Environmental/Preservation Organization or Association, Olympia, WA - #43584.93000)	Gifford Pinchot	WA
The North Cascades and Mt. Rainier National Park (Individual, Tacoma, WA - #5567.41100)	Gifford Pinchot, Mt. Baker-Snoqualmie, Okanogan, Wenatchee,	WA
Mount St. Helens National Volcanic Monument. (Individual, No Address - #19758.64351)	Gifford Pinchot	WA
In the Gifford Pinchot National Forest the Sawtooth Roadless Complex (Individual, Mercer Island, WA - #25189.83421)	Gifford Pinchot	WA
In the Dark Divide Roadless area, Gifford Pinchot National	Gifford Pinchot	WA

AREA	NATIONAL FOREST OR GRASSLAND	STATE
Forest, the Randle District Ranger…Juniper and Langille Ridge…Cispus River Drainage… (Individual, Seattle, WA - #13029.64351)		
Gifford Pinchot National Forest. The Dixon Mountain roadless area is an important one to remain roadless due to its proximity to Mount Rainier and the Tatoosh Wilderness, as with the roadless area east of Backbone Ridge….The Goat Dike area should remain roadless to prevent deterioration of vistas along highway 12 on the approach to Rainier. Areas around Mount Adams should also remain roadless. The northern side of Adams…and the area on the north between road 5603 and the wilderness as well as the large roadless area in the Adams Creek area should remain so. The roadless areas on either side of Quartz Creek on the approach to Mount St. Helens National Monument… (Individual, Arlington, VA - #13240.84610)	Gifford Pinchot	WA
The Hogback area and the White Pass Ski Area (WPSA) in the Washington Cascades (Individual, Olympia, WA - #17516.93310)	Gifford Pinchot, Wenatchee	WA
Recreation areas for Puget Sound residents in the Wenatchee (Devil's Gulch, particularly popular with Seattle mountain bikers) and Gifford Pinchot (Dark Divide) National Forests (Town or Municipality, Seattle, WA - #28912.64351)	Gifford Pinchot, Wenatchee	WA
The Condrey Mountain roadless area…in the Klamath-Siskiyou region (Individual, Ashland, OR - #43732.83000)	Klamath, Siskiyou	OR
Monument Rock, Upper Catherine Creek, Boulder Park, North Mt. Emily, Mt. Emily (Individual, LaGrande, OR - #14838.9100)	Malheur, Wallowa-Whitman	OR
Trail to Lake Serene and the Mt. Index area in the Mt. Baker-Snoqualmie National Forest…areas near Annette Lake and the Middle Fork of the Snoqualmie River (Individual, Issaquah, WA - #53404.64351)	Mt. Baker-Snoqualmie	WA
White Chuck River between the Glacier Peak Wilderness and the south bank of the White Chuck River, the Cedar Creek drainage between the North Cascades Scenic Highway and the Lake Chelan Sawtooth Wilderness, the Entiat and Madd River drainages south of Glacier Peak Wilderness, and Noisy Eagle Wilderness between the Noisy-Diobsud Wilderness and the North Cascades National Park and the Baker River (Environmental/Preservation Organization, Seattle, WA - #52189.64351)	Mt. Baker-Snoqualmie, Okanogan, Wenatchee	WA
Trails (Mt. Baker-Snoqualmie): Mt. Pugh 644, Hidden Lake 745, Bald Eagle Lake 1050, Mt Dickerman 710, Barclay Lake 1056, Pacific Crest Trail 2000 Trails (Wenatchee): Devil's Gulch 1220, Red Hill 1223, Gold Creek 966, Nason Ridge 1583, Colchuck Lake 1599, Snow Lakes 1553, Hex Mountain 1343, Lost Lake 1421. (Individual, Seattle, WA - #86978.64351)	Mt. Baker-Snoqualmie, Wenatchee	
Mt. Baker-Snoqualmie N.F…. west of Mount Baker in the entire Groat Mountain roadless area, along the approaches north of Twin Sisters along the Middle Fork of the Nooksack,	Mt. Baker- Snoqualmie	WA

AREA	NATIONAL FOREST OR GRASSLAND	STATE
and adjacent to the Mount Baker Wilderness on the Baker Lake side….The area adjacent to Baker Lake on the Anderson Butte….Cascade Pass road and along either side of highway 20 on the approach to Ross Lake Recreation Area near Marblemount….the southern side of Higgins Mountain is a scenic approach to the Cascades and should not be roaded, as with the French Creek area on the south side of highway 530….to the Clearwater Wilderness and Mount Rainier….Mt. Rainier National Park along the Chenuis Creek (Individual, Arlington, VA - #13240.84610)		
The Skagit River Bald Eagle Natural Area (Preservation/Conservation Organization, Seattle, WA - #10733.83421)	Mt. Baker-Snoqualmie	WA
Blanca Lake (Individual, Seattle, WA - #6064.10100)	Mt. Baker-Snoqualmie	WA
Barclay Lake Roadless Area in the Mt. Baker/Snoqualmie National Forest (Town or Municipality/Municipal Association, Seattle, WA - #28912.90200)	Mt. Baker-Snoqualmie	WA
(Washington Cascades trails) Lookout Mt, Hidden Lakes trail, Mt Pugh, W Cady Ridge, Mt Forgotten, Mt Dickerman, Sun Top, Noble Knob, The Entiat River area, Nason Ridge, Rock Mt, Chatter Creek, the Teanway area (Ingalls, Bean Creek, Beverly Creek, Standup Creek, Iron Peak). (Individual, No Address - #19758.91000)	Mt. Baker-Snoqualmie	WA
Independence Lake in the Mt. Baker/Snoqualmie National Forest north of the Mountain Loop Highway northeast of Silverton, WA. I would encourage you to strengthen the plan to include this area adjacent to the Boulder River Wilderness. It should extend to capture Helena Peak, Helena Lake, Devils Peak, Devils Thumb, North Lake, Pass Lake, on to the east to Mt. Forgotten, south to Twin Peaks and Mt. Dickerman and back west to include Perry Creek. (Individual, Bothell, WA - #18334.64351)	Mt. Baker-Snoqualmie	WA
Annette Lake, Middle Fork Snoqualmie, Mt. Index. (Individual, Lakewood, WA - #17684.64252)	Mt. Baker-Snoqualmie	WA
Barclay Lake and Boardman Lake trails, Washington. (Individual, Seattle, WA - #13058.64351)	Mt. Baker-Snoqualmie	WA
Lookout Mountain, Granite Mountain, Alpine Lakes Wilderness (Recreational Organization, Seattle, WA - #29928.64351)	Mt. Baker-Snoqualmie, Wenatchee	WA
Mt. Hood National Forest (Individual, Mount Hood, OR - #43419.10110)	Mt. Hood	OR
Mt. Hood National Forest. All the small roadless areas adjacent to the Mount Hood Wilderness…Veda Butte segment adjacent to the Salmon-Huckleberry Wilderness should remain roadless to preserve vistas of Mount Hood. The Olallie Lake area north of the Mount Jefferson Wilderness… (Individual, Arlington, VA - #13240.84610)	Mt. Hood	OR
Okanogan National Forest. The area south of highway 20 adjacent to the Lake-Chelan-Sawtooth wilderness (Individual, Arlington, VA - #13240.84610)	Okanogan	WA

AREA	NATIONAL FOREST OR GRASSLAND	STATE
Jupiter Ridge, Quilcene, and South Quinault Ridge (Individual, Olympia, WA - #1649.10100)	Olympic	WA
Olympic National Forest…South Quinault Ridge and Upper Skokomish…upper Sams River and the Bogachiel-to-Calawah forests. (Individual, Bainbridge Island, WA - #13829.93300)	Olympic	WA
Olympic Peninsula (Individual, Sequim, WA - #8764.93200)	Olympic	WA
Olympic National Forest. The small roadless areas adjacent to the Colonel Bob Wilderness…The roadless areas on either side of the Hamma-Hamma River… (Individual, Arlington, VA - #13240.84610)	Olympic	WA
Mt. Jupiter, Duckabush River, Lena Lake, Red Mountain, Snow Lakes, Boulder, Cougar Mountain (Individual, Seattle, WA - #6063.92300)	Olympic	WA
Pelican Butte, Mount Ashland in Oregon (Individual, Gasquet, CA - #51069)	Rogue River, Winema	OR
Bald Mountain, North Kalmiopsis, Silver Creek, Hobson Horn, Shasta Costa, Canyon Creek, the Kangaroo Roadless Area, Sugarloaf, Copper-Salmon, Baldface Creek, South Kalmiopsis, Mt. Ashland, Rough and Ready Creek, and Quosatana (Individual, Cave Junction, OR - #1936.10100)	Rogue River, Siskiyou	OR
Include: Kalmiopsis (North and South), the Rough and Ready, the Siskiyous, and the Red Buttes-Kangaroo Roadless Areas. (Individual, Medford, OR - #8313.90200)	Siskiyou	OR
Umpqua National Forest. The entire roadless area north and west of Diamond …The roadless area west of The Boulder Creek Wilderness …the Cinnamon Butte-Thirsty Point-Kelsey Butte Roadless Area NNE of Diamond Lake… (Individual, Arlington, VA - #13240.84610)	Umpqua	OR
Oregon Cascade Recreation Area in Diamond Lake (Individual, Pine Bush, NY - #8988.64351)	Umpqua	OR
Protect proposed timber sales of old growth in the Brice Creek Watershed. (Individual, Cottage Grove, OR - #40074)	Umpqua	OR
The Wyatt/Blodgett area of the Brice Creek watershed area (Individual, Cottage Grove, OR - #760.64350)	Umpqua	OR
Paw Chopper timber sale, Mt. Bailey RARE II roadless area, Bear Paw timber sale, North Umpqua River, including Upper North, Warm Springs, and Lemolo timber sales, Kelsey Valley, White Mule Creek, or Upper Mountain Meadows, Oregon Cascade Roadless Area, Steamboat and Fairview watersheds (Environmental/Preservation Organization, Roseburg, OR - #50639.64351)	Umpqua	OR
Mt. Bailey roadless area, Oregon (Individual, Glide, OR - #3601.83000	Umpqua	OR
Thirsty Creek, Sherwood, Lonesome Meadow (Environmental/Preservation Organization, Roseburg, OR - #836464351)	Umpqua	OR
Wenatchee National Forest….areas on either side of highway 2 east of Stevens Pass and the checker-board areas near Kacheles Lake. The areas along highway 12 north of Rimrock Lake.	Wenatchee	WA

AREA	NATIONAL FOREST OR GRASSLAND	STATE
(Individual, Arlington, VA - #13240.84610)		
Areas adjacent to Alpine Lakes Wilderness and Snoqualmie Pass. (Individual, Forks, WA - #18696.64411)	Wenatchee	WA
Willamette National Forest. All small roadless areas adjacent to the Mount Jefferson Wilderness (including those on the NW, SW and south sides) …the Santiam Pass corridor…areas adjacent to the NW side of Mount Washington Wilderness… Sand Mountain volcanic field (Individual, Arlington, VA - #13240.84610)	Willamette	OR
Moose Creek (Individual, Corvallis, OR - #17672.10110)	Willamette	OR
ROADLESS AREAS IN THE OLD CASCADES/MIDDLE SANTIAM of the central Willamette National Forest: MOOSE LAKE RS, GORDON MEADOWS RA, JUMPOFF JOE RA, BROWDER RIDGE RA, ECHO MT. RA, THREE PYRAMIDS RA PYAMID CREEK RA AND BIG MEADOWS RA…BROWDER RIDGE RA IN THE WILLAMETTE NF. (Environmental/Preservation Organization, Albany, OR - #6506.64350)	Willamette	OR
Devil's Ridge area, Breitenbush Hot Springs, Mt Jefferson Wilderness Area, forests near Detroit, Oregon (Recreation Organization, Detroit, OR - #26127.64351)	Willamette	OR
Moose Timber Sale, Sweet Home District…between the Menagerie and Middle Santiam Wilderness Areas. Moose Creek…a major tributary to the South Santiam River South Pyramid Timber Sale, Sweet Home District…Three Pyramids unroaded area…South Pyramid Creek trail… Helldun Timber Sale, Middle Fork District…connects the Waldo Wilderness with the RARE II inventoried Cornpatch roadless area….Eugene to Crest Trail…Eagle Creek Special Interest Area… Coffin Timber Sale, Detroit District …the Coffin/Bachelor Mountain…located within the Mary's Creek Sub-basin of the Upper North Santiam watershed (Environmental/Preservation Organization, Nevada City, CA - #50392.64350)	Willamette	OR
Ski resorts in the roadless areas of the Winema NF (Individual, Klamath Falls, OR - #1266.64350)	Winema	OR
The Pelican Butte ski area (Individual, Klamath Falls, OR - #593.64353)	Winema	OR
Winema National Forest. The small roadless area south of Miller Lake…areas adjacent to Sky Lakes and Mountain Lakes Wildernesses…The north side of Brown Mountain west of Lake of the Woods… (Individual, Arlington, VA - #13240.84610)	Winema	OR

Region 8 Southern

AREA	NATIONAL FOREST OR GRASSLAND	STATE
Land east of the Mississippi	Multiple	MS
Areas identified in the Southern Appalachian Assessment (Individual, Ashland, OR - #527.64140)	Multiple	AL, SC, GA, TN, VA
Southern Appalachian Mountains (Individual, Sautee, GA - #3518.83000)	Multiple	Multiple
The Appalachian corridor (Individual, Toccoa, GA - #9217.64351)	Multiple	Multiple
Include Chattahoochee River Basin (Environmental/Preservation Organization, Gainesville, GA - #28952.64351)	Multiple	Multiple
In North Carolina, the Big Ivy/Craggy Mountain area is an uninventoried roadless area adjacent to the Craggy Mountain Wilderness Study Area. The area is a part of the Black Mountains biological hot spot identified in the Moriah Project…Also in North Carolina, Wasser Balk, Tellico Bald, and Split Whiteoak…of the Nantahala Bird Corridor... Virginia's White Top Mountain is an uninventoried roadless area that is a part of the very significant Mount Rogers biological hot spot area…. The uninventoried roadless extension to the Unaka Mountain Wilderness falls within the Unaka Mountains hotspot area in Tennessee….Also in Tennessee, Iron Mountain is an uninventoried roadless area that was inventoried as roadless during RARE II but was dropped in the Southern Appalachian Assessment inventory. It is a part of the Shady Valley hotspot area….the ridges of Iron Mountain provide an essential bear corridor between Tennessee and Virginia. Georgia's Blackwell Creek and Black Mountain…The uninventoried roadless extension to Rich Mountain Wilderness is part of the Rich Mountain hot spot area…. In South Carolina, the uninventoried Tamassee roadless area makes up a large portion of the White Rock/Tamassee hot spot area. (Environmental/Preservation Organization, Chapel Hill, NC - #52231.64351)	Multiple	NC, SC, TN, VA
WINDY GAP (RABUN BALD - WESTERN SECTION) - previously inventoried as roadless (Rabun Bald); over 5 miles of the Bartram National Recreation Trail are included in the core of this area… THREE FORKS…including the wild and scenic Chattooga River… MOCCASIN CREEK…Tray Mountain Wilderness and Kelley Ridge Roadless Area… HIGH SHOALS…next to Tray Mountain Wilderness, includes High Shoals Scenic Area; rugged and unique botanical area containing three important watersheds of the Hiawassee River…	Multiple	AL, SC, GA, TN, VA

AREA	NATIONAL FOREST OR GRASSLAND	STATE
MILL CREEK…in the Ed Jenkins NRA; includes both the Appalachian and Benton MacKaye Trails; includes the entire Mill Creek watershed… LICKLOG…contains Benton MacKaye and Duncan Ridge Trails… BLACKWELL CREEK…contains the Appalachian Trail and the entire Blackwell Creek watershed… GRASSY MOUNTAIN - includes entire western mountain-side of Grassy Mountain; next to Cohutta Wilderness and Lake Conasauga Recreation Area… HORSE GAP - includes the entire headwaters of the Etowah River and West Montgomery Creek… (Environmental/Preservation Organization, Chapel Hill, NC - #52231.64351)		
Briar Creek/Four Notch area in Sam Houston National Forest, Stark Area in Sabine Nation Forest, Big Slough Wilderness area, Davy Crockett National Forest, Alabama Creek area, Davy Crockett National Forest, South Caney Creek area in Sam Houston National Forest, Boggy Creek area in Angelina National Forest, Upland Island Wilderness area in Angelina National Forest, Indian Mounds Wilderness area in Sabine National Forest, Patroon Bayou area in Sabine National Forest, Nebletts Creek area in Sam Houston National Forest. (Environmental/Preservation Organization, Bellaire, TX - #13951.64421)	Angelina, Davy Crockett, Sabine, Sam Houston	TX
We support protection of the following Texas RA's: a. 671 acres adjacent to the west side of Little Lake Creek Wilderness Area in SHNF b. 6,767 acre Big Creek Scenic Area in SHNF c. 1,587 acre Winters Bayou Scenic Area in SHNF d. 1,020 acre Beech Ravines Scenic Area in Sabine National Forest (SNF) e. 230 acre Upper Colorow Creek Scenic Area in SNF f. 307 acre Mill Creek Cover Research Natural Area in SNF g. 665 acre Bear Creek Special Bottomland Area in SNF h. 1,200 acre Ayish Bayou Special Bottomland Area in Angelina National Forest (ANF) i. 3,500 Attoyac Bayou Special Bottomland Area in ANF j. 6,110 acre Upper Angelina River Special Bottomland Area in ANF k. Neches River Corridor, Segments 1-4, on the Davy Crockett National Forest (DCNF) and ANF l. 32,300 acre Longleaf Ridge Special Area in ANF m. 152 acre adjacent to the East side of the Turkey Creek Wilderness Area in ANF n. 1,335 acres south of FR 202 and east of FR 207 in the Big Woods Area in SHNF o. 1,960 acre Harmon Creek Area in SHNF p. 4,800 acre Briar Creek/Four Notch Area in SHNF q. 1,138 acres adjacent to the east side of the Big Slough Wilderness Area in DCNF r. 3,400 acre Star Area in SNF	Angelina, Davy Crockett, Sabine, Sam Houston	TX

AREA	NATIONAL FOREST OR GRASSLAND	STATE
s. 3,400 acre Alabama Creek Area in DCNF t. 2,600 acre South Caney Creek Area on SHNF u. 4,700 acre Chambers Ferry Area in SNF v. 5,000 acre Jordan Creek Area in ANF w. 1,897 acre Boggy Creek Area in ANF x. 1,492 acre Bounds Peninsula Area in ANF y. 1,280 acres Graham Creek Area adjacent to the Upland Island Wilderness Area in ANF z. 4, 862 acres adjacent to Indian Mounds Wilderness Area in SNF aa. 5,200 acres Patroon Bayou Area in SNF bb. 1,500 acre Nebletts Creek Area in SHNF cc. Uninventoried West Fork of the San Jacinto River Area in SHNF dd. Uninventoried East Fork of the San Hacinot River in SHNF ee. Uninventoried Lake Conroe Shoreline in SHNF ff. Uninventoried Tarkington Bayou Area in SHNF gg. Uninventoried Double Lake Branch and Henry Lake Branch Areas of SHNF hh. Univentoried LSHT Corridor of at least 300 feet wide and 130 miles long in SHNF …all RARE II areas in the National Forests in Texas in the Final Roadless Area EIS. (Environmental/Preservation Organization, Bellaire, TX - #13951.64351)		
National Forests in Florida (Environmental/Preservation Organization, Lake City, FL - #28999.64351)	Apalachicola, Osceola, Ocala	FL
a) Beech Creek National Scenic Area, designated under 16 USC Section 460vv-9. b) Kerr Memorial Botanical Area and Beech Creek botanical Area designated under 1 USC Section 460vv-7; c) …Winding Stair Mountain National Recreation and Wilderness Area, and adjacent lands…. 2. All of the 10 areas listed in the Appendix to the Ouachita National Forest Plan EIS for Reevaluation as Roadless… c) …Beech Creek, Black Fork Mt proposed addition, including legal description and topo map, Rich Mountain and the Upper Kiamichi…. a) The watershed of the Glover River b) Other areas included in the "land swap" lands 1) Ashford Peak (7,300 acres) and Bee Mountain (7,300 acres) on the east and west sides of Broken Bow Lake 2) Area immediately surrounding the Broken Bow Reservoir… 3) Area adjacent to state managed Broken Bow Wilderness… The watersheds of the Kiamichi and Mountain Fork. The Kiamichi and Mountain Fork Rivers… Oklahoma's National Grasslands… include the Black Kettle and Rita Blanca, totaling over 47,000 acres. (Environmental/Preservation Organization, Sapulpa, OK - #29844.64351)	Black Kettle and Rita Blanca National Grasslands, Ouachita	OK
Areas in the Chattahoochee National Forest	Chattahoochee	GA

AREA	NATIONAL FOREST OR GRASSLAND	STATE
(Individual, Duluth, GA - #50515.64351)		
Protect Tallulah Ranger District of the Chattahoochee National Forest Hickory Bottoms Timber Sale Rabun Bald Rare II area, Beaver Lakes Roadless Area (Preservation/Preservation Organization, Plymouth, MN - #51067.64351)	Chattahoochee	GA
Buzzard Knob, Anna Ruby Falls, Little Rock, Chattahoochee River Extensions, Blackwell, Andrews Cove, Wildcat, Nolichucky, Laurel Fork, Hickory Flat Branch, Mill Creek on the Jefferson NF Springer Mountain (Lance Creek) and Kelley Ridge (Chattahoochee NF) Southern Nantahala Wilderness Extension, Wesser Bald, Cheoah Bald Bald Mountain (Nantahala NF) Bald Mountain (Pisgah and Cherokee NF) Slide Hollow, Big Laurel Branch Wilderness Extension, Flint Mill Gap, Beaver Dam Creek (Cherokee and Jefferson NF) Lewis Fork Wilderness Extension, Little Wilson Creek Wilderness Extension, Racoon Branch, Crawfish Valley (Bear Creek), Beartwon Wilderness Extension, Garden Mountain, Hunting Camp-Little Wolf Creek, Brushy Mountain, Peters Mountain Wilderness Extension, Mountain Lake Wilderness Extension, Brush Mountain East, James River Face Wilderness Extension (Jefferson NF) Three Sisters, Mount Pleasant, The Priest, Three Ridges (George Washington NF) Tellico Bald, Paint Creek, Feathercamp, Lynn Camp Creek, Dismal Creek, Cove Mountain and White Oak Ridge-Terrapin Mountain (Environmental/Preservation Organization, Atlanta, GA - #25991.64351)	Chattahoochee, Cherokee, George Washington, Jefferson, Nantahala, Pisgah	GA, NC, TN, VA, WV
Areas north of Lake Burton (Individual, Woodstock, GA - #1805.64351)	Chattahoochee	GA
Roadless areas on Georgia's National Forests	Chattahoochee-Oconee	GA
Kelly Ridge and Patterson Gap near Lake Burton, Georgia…. Moccasin Creek and Three Forks area, Georgia. (Individual, No Address - #3236.83210)	Chattahoochee-Oconee	GA
Cherokee National Forest… Devil's Backbone and Coker Creek (Individual, Knoxville, TN - #11253.64351)	Cherokee	TN
Daniel Boone National Forest (Individual, Norman, OK - #25836.92300)	Daniel Boone	KY
Delta National Forest (Individual, Ridgeland, MS - #25475.10100)	Delta	MS
Devil's Fork and Hickory Flats Wilderness Study Areas on the Pisgah/Nantahala…Lost Cove, Harper Creek, Craggy Mountain, Snowbirds (Environmental/Preservation Organization, Ashville, NC - #43412.64420)	Jefferson, Pisgah, Nantahala	NC, WV
North mountain Roadless Area (Broad Run timber sale, Icy Hopper timber sale on the Thunder Ridge Wilderness Area on	Jefferson, George Washington	VA, WV

AREA	NATIONAL FOREST OR GRASSLAND	STATE
the Glenwood Ranger District, Sony Point Ridge, Potts Mountain, and Wilson Mountain, Crawford Mountain, Big Stony RA, Roaring Branch, Little Stony Creek Terrapin MTN, Arney Groups, Greasy Rocks, Little Mare Mountain, Chestnut Mountain 644A, Three Putt, Mud Run, Rocky-Anderson, Enterprise, Cripple Creek, Millenium, Tolliver Hollow-Rocklick, Grindstone, Hamilton Draft, Dowell's Draft, Short Ridge, Jehu Hollow, mulligan, Bear Trap, and Hiner Hollow Timber Sales Mt. Rodgers NRA - Jones Knob/Bournes Branch; Grave Mountain; Hurricane Mountain/Locust Ridge Clinch Ranger District- Big Flat Top; Pickem Mountain; Pine Mountain Wythe Ranger District - Six Valley Tract/Brown's Peak; Walker Mountain; Pond/Rich Mountains; Glade Mountain; Round Mountain Brushy Ridge Blacksburg Ranger District - Big Pond/Rocky Gap/ John's Creek Mountain; Flat Top Mountain; Sinking Creek Mountain/Huckleberry Knob New Castle Ranger District - Little Mountain/ Bald Mountain; Potts Knob/Nickolson Knob; Steel Bridge; Peters Mountain Bogs area Glenwood Ranger District - Spec Mines/Curry Creek/Harvey's Knob George Washington National Forest: Pedlar RD - White Peak/Coates Mountain/Irish Creek, Chimney Rock Mountain, Pedlar Gap area, Shady Mountain Cashaw Creek/Terrapin Creek, Little Piney River/Doefoot Mountain Deerfield RD - Shaws Ridge, Chestnut Oak Knob, Ramseys Draft Extension addition, Gwin Mountain/Benson Run/Reubuns Draft, Great North Mountain, Crawford Mountain And Elliot Knob RAs, Walker Mountain, Sideling Hill/Mill Mountain, Jerkemtight RA Warm Springs RD - Warm Springs Mountain/Bear Hole Run, Paddy Lick, Big Ridge, Black Knob/Sue Run, Back Creek Mountain, Little Allegheny RA addition James River RD - Middle Mountain, Fore Mountain, Snake Run Ridge/Peters Mountain, Slatey Mountain/Dameron Mountain, Potts Mountain Dry River RD- Grandaddy Knob/Marks Knob/Sugar Run, Shenandoah Mountain, Dunkle Knob/Shenandoah MountainWildcat Ridge/Laurel Run, Feedstone Mountain/Bald Knob, Stony Point Ridge/Cabin Ridge Lee Ranger District - Great North Mountain/Church Mountain/Laurel Run, Long Mountain/Bens Ridge, Jonnies Knob, Green Mountain/Menaka Peak/Powell Mountain, Waterfall Mountain/Duncan Knob, Big Mountain/ Browns Run, North Massanutten RA (Environmental/Preservation Organization, Staunton VA - #29919.64351)		
Cunningham Brake Inventoried Roadless Area	Kisatchie	LA

AREA	NATIONAL FOREST OR GRASSLAND	STATE
(Environmental/Preservation Organization, New Orleans, LA - #43807.64351)		
Ocala National Forest (Environmental/Preservation Organization, Lake City, FL - #28999.64350)	Ocala	FL
Winona/Flatside area and land adjacent to Lake Ouachita, Arkansas (Individual, Friendship, AR - #3240.80000)	Ouachita	AR
In the Ouachita National Forest Caddo Mountain Area, Hog Jaw Mountain, Bear Den Mountain, Crystal/Locust Mountain Area, Sharp Top Mountain, Gap Creek, Leader Mountain, Brush Heap, Fourche Mountain, Cossatot Mountain, Polk Creek Mountain and the Fodderstack Range, Bear Mountain, Blakely and Little Blakely Special Areas, Blue Ouachita Mountain Area, Sandlick Mountain Area, Dry Creek Wilderness Boundaries, Dutch Creek Mountain, Chinquapin Mountain Area, Middle Rich Mountain Area, Shutin Mountain, Cow Creek, Bee Mountain Area, Kiamichi Mountain Area, Winding Stair Boundary Area and Poteau Mountain. (Environmental/Preservation Organization, Hot Springs, AR - #43420.61300)	Ouachita	OK
Ozark and Ouachita National Forests (Individual, Little Rock, AR - #9845.10100)	Ouachita, Ozark	AR
Ozark National Forests Special Areas (Individual, Fayetteville, AR - #6991.92300)	Ozark	AR
In the Ozark-St. Francis National Forests Sugar Creek in the St. Francis District; Stack Rock, Hare Mountain, the Dismal Hollow Addition, Buzzard Roost Rocks, Spring Creek, Lower Graves Creek, Eagle Gap, Flat Rock Creek, the White Rock Addition and Mt. Magazine (Environmental/Preservation Organization, Hot Springs, AR - #43420.61300)	Ozark-St. Francis	AR
Big Creek Wilderness Area--Sam Houston NF, 1920 acres (Individual, No Address - #2811.64351)	Sam Houston	TX
I specifically support the areas proposed in Alabama; MOUNT CHEAHA, DUGGER MOUNTAIN, OAKEY MOUNTAIN, BLUE MAOUNTAIN AND REID BRAKE. (Individual, Birmingham, AL - #19787.92300)	Talladega	AL
Oakey Mountain and Blue Mountain, Talladega National Forest, Brushy Fork, Bankhead National Forest (Individual, No Address - #8489.64411)	Talladega, William B. Bankhead	AL
Uwharrie National Forest in Montgomery County, NC (Individual, No Address - #15025.64351)	Uwharrie	NC

Region 9 Eastern

AREA	NATIONAL FOREST OR GRASSLAND	STATE
Region 8, the Southern Region, and Region 9, the Eastern Region… For Example, some national forests in the region, include the Wayne in Ohio, and the Chippewa in Minnesota, have no areas designated into the program. In addition, the national forests in the entire state of Mississippi, which has 5 national forests containing 1.1 million acres, has only 6 thousand acres designated into the program, or one half of one percent. (Individual, Brookport, IL - #126.64351)	Multiple	Multiple
Preserve Northern Michigan (South Boardman, MI - #28344.93300)	Multiple	MI
Whisker Lake Area in Wisconsin	Chequamegon-Nicolet	WI
Chippewa National Forest. Furthermore, I would like the Forest Supervisor to identify additional unroaded areas. (Individual, Grand Rapids, MN - #13288.10100)	Chippewa	MN
Include Trout Lake Tract, the former Joyce Estate (Individual, Grand Rapids, MN - #13288.91610)	Chippewa	MN
Protect Chippewa and Superior National Forests (Individual, Minneapolis, MN - #22302.92300)	Chippewa, Superior	MN
Daniel Boone NF, Shawnee NF, Jefferson NF (Individual, Lexington, KY - #1697.83610)	Daniel Boone, Jefferson, Shawnee	KY, IL, KY, VA
Areas in Vermont (Individual, Hardwick, VT - #11294.64351)	Finger Lakes, Green Mountain	VT
The Adirondacks (Individual, Greenwich, CT - #1872.64351)	Finger Lakes, Green Mountain	NY
The Dolly Ann area in the George Washington NF (Individual, Washington, DC - #1699.64351)	George Washington	WV
200,000 acres in the Green Mountain and White Mountain NFs (Individual, No Address - #2971.64351)	Green Mountain, White Mountain	NY, NH
Lamb Brook, Glastonbury Mountain, Romance Mountain, Lye Brook, Breadloaf, Lincoln Ridge, and Philadelphia Peak. (Environmental Preservation Organization, Hanover, NH - #14659.10100)	Green Mountain	NY
Hiawatha National Forest. (Individual, Iron Mount, MI - #14625.92300)	Hiawatha	MI
The Trap Hills in the Ottawa NF and Scott's Marsh in the Hiawatha NF (Individual, Chicago, IL - #1336.64350)	Hiawatha, Ottawa	MI
Spring Creek area in the Willow Springs District which would be affected by the prohibition…the corridor of the Ridgerunner Trail (Individual, No Address - #13778.93300)	Mark Twain	MO
Big Spring in Carter County (Individual, Jackson, WY - #6504.64351)	Mark Twain	MO
Anderson Mountain, Lower Rock Creek Area, and Van East Mountain on the Fredricktown District, Spring Creek and North Fork River Area on the Willow Springs District, Swan Creek and Big Creek on the Ava District	Mark Twain	MO

AREA	NATIONAL FOREST OR GRASSLAND	STATE
Smith Creek on the Cedar Creek District (State Agency, Jefferson City, MO - #51127.64351)		
Roadless areas in the Mongahela N.F. (Individual, Fairmont, WV - #9095.64351)	Mongahela	WV
Dolly Sods North and Roaring Plains in Monongahela National Forest (Individual, Berkeley Springs, WV - #2767.10100)	Mongahela	WV
20,000 acres around the Forked River Mountains (Individual, No Address - #32.64351)	No National Forests	NJ
"TRAP HILLS" located in the western portion of the Ottawa National Forest. …It is east of and adjacent, geologically and biologically related to the "MICHIGAN PORCUPINE MOUNTAIN WILDERNESS STATE PARK"… The two timber sales, "High Country" and "Sandhill Creek" (Local Community/Civic Organization/Church, Ewen, MI - #43542.64423)	Ottowa	MI
Areas East of the 100th Meridian, streams in the Shawnee National Forest, Clear Creek and Hutchins Creek drainages in Union County (Individual, Boise, ID - #40983.64351)	Shawnee	IL
Areas in the Shawnee NF (Individual, No Address - #1327.64351)	Shawnee	IL
Bald Knob, Larue-Pine Hills, Clear Springs, Shawnee NF, Illinois. (Individual, Brookport, IL - #126.64351)	Shawnee	IL
Burke Ranch, Ripple Hollow, Camp Hutchins and Murray Bluff; streams: Lusk, Bay, Big, and Grand Pierre Creeks (Individual, Pleasant Plains, IL - #1499.61300)	Shawnee	IL
Camp Hutchins area….the Larue-Pine Hills ecological areas, the Bald Knob and Clear Springs wilderness areas, and the Trail of Tears State Forest (Individual, Brookport, IL - #126.64351)	Shawnee	IL
Seven Beavers/Big Lake area (Individual, Saint Paul, MN - #9977.64351)	Superior	MN
The Sandwich Range (Individual, University Park, MD - #2928.10100)	White Mountain	NH, ME
Wild River Watershed, Pemigewasset Wilderness, Caribou-Speckled Wilderness, West Branch of Pleasant River, Sandwich Range Wilderness, Presidential Range-Dry River Wilderness, Great Gulf Wilderness, Kilkenny area, Carr Mountain and Insman-Gordon Pond. (Individual, Lincoln, NH - #26015.64351)	White Mountain	NH, ME
Roadless lands to the north, east, and south of the current Pemigewasset Wilderness area, areas surrounding the Sandwich Range Wilderness and WH. Chocorou Scenic Area, Cerr Mountain, Kinsman Ridge, the lands surrounding Mt. Moosilavkee, the Wild River/Carter Range/East Branch Saco/Chandler Mountain/"Batcholder Grant" area, Mt. Kearsurge, including the Range and Pilot Range. (Individual, Keene, NH - #6702.64351)	White Mountain	NH, ME

Region 10 Alaska

AREA	NATIONAL FOREST OR GRASSLAND	STATE
Protect Alaska (Environmental/Preservation Organization, Davis, CA - #29925)	Multiple	AK
Alaska's Tongass and Chugach (Environmental/Preservation Organization, Juneau, AK - #29929)	Chugach, Tongass	AK
Native-owned lands of Southeast Alaska (Individual, Anchorage, AK - #13276.71130)	Chugach, Tongass	AK
Copper River Delta, Alaska (Individual, Kodak, TN - #6759.64411)	Chugach	AK
Denali National Park, Copper River Delta, and the Artic National Wildlife Refuge (Individual, Lees Summitt, MO - #19441.10100)	Chugach, Artic National Wildlife Refuge, Denali National Park	AK
Protect from the Fanshaw Timber Sale which considers building a road through the Port Houghton Special Interest Area and Port Houghton (Individual, Juneau, AK #52964.6420)	Tongass	AK
Cape Fanshaw and Farragut Bay near Petersburg: North Cholmondeley and Moira Sound areas on eastern Prince of Wales Island; Little Seal Bay near Tenakee Springs; baby Bear Bay near Sitla; Woewodski Island near Petersburg; Canal and Hoya Creeks neat to the Anan Bear Observatory; Whale's Tail on Etolin; Virginia Lake and Mill Creek near Wrangell; Bostwick Bay and Creek on Gravina Island, and Neka mountain near Hoonah. This area should be protected under the roadless policy. (Individual, Juneau, AK - #52964.64420)	Tongass	AK
Honker Divide, Cleveland Peninsula, East Kuiu, Port Houghton, Poison Cove, Deep Bay, Ushk Bay, Chicken Creek, Upper Tenakee Inlet, Cape Fanshaw, Farragut Bay, Chomondeley Sound, Moira Sound, Little Seal Bay, St. James Bay, Davies Creek, Cowee Creek, Point Couverden, Saltery Bay, Baby Bear Bay, Woewodoski Island, Canal Creek, Hoya Creek, Whale's Tail, Bostwick Bay and Creek (Environmental/Preservation Organization, Port Alexander, AK - #52943.64351)	Tongass	AK
The entirety of Sweetwater-Honker Divide, and Upper Duncan Canal, East Kuiu Island, portions of Tenakee Inlet (including areas between Goose Flats and Long Bay as well as Saltery Bay), Cape Fanshaw, Farragut Bay, North Cholmondeley, Clover Bay, Moira Sound, Little Seal Bay, Emerald Bay, Davies Creek, Upper Lynn Canal, St. James Bay, Pt. Couverden, Taku Inlet and Harbor, Windham Head, Baby Bear Bay, Totem Bay, Douglas Bay, Woewodski Island, Crittenden Creek, Virginia Lake and Creek, Canal and Hoya Creeks, Whale's Tail, Sunny Bay, Bostwick Bay and Creek, Soda Bay, Cleveland Peninsula, Port Houghton, Poison Cove, Deep and Ushk Bays, and Upper Tenakee Inlet. (Individual, Plymouth, NH - #6842.64351)	Tongass	AK

AREA	NATIONAL FOREST OR GRASSLAND	STATE
North Cholmondely and Moira Sounds on eastern Prince of Wales Island, Emerald Bay and Canal and Hoya Creeks (near the Anan Bear Observatory) on Cleveland Peninsula, and Farragut Bay near Petesburg…including East Kuiu Island, Port Houghton and Honker Divide. (Individual, Talkeetna, AK - #13348.64351)	Tongass	AK
Upper Lynn Canal (St. James Bay, Pt. Couverton, Berner's Bay), Tenakee Inlet, the Kake-Petersburgh area (Duncan Canal, Woewodski Island, East Kuiu), Etolin Island, Anan Creek, Honker Divide, and the Cleveland Peninsula. (Individual, Juneau, AK - #14850.90200)	Tongass	AK
Areas in northern Southeast Alaska, such as Berners Bay, St. James Bay, and the Mansfield Peninsula are very important to us. We do not want to see clearcuts in these places. (Individual, Juneau, AK - #25901.64351)	Tongass	AK
Ushk Bay/Poison Cove, Crab Bay. (Individual, Sitka, AK - #25029.64351)	Tongass	AK
Lisa Creek and St. John Bay and throughout NW Baron of Island (Individual, Sitka, AK - #1083.64351)	Tongass	AK
Mitkof Island and other islands in the Southeast Alaska (Individual, Petersburg, AK - #11822.83500)	Tongass	AK
Gravina Island (Tribal, Ketchikan, AK - #13987.90230)	Tongass	AK
Kuiu Island, Alaska. (Individual, Talkeetna, AK - #14705.64351)	Tongass	AK
Little Field Day Creek in Tenegilan, Sunny Creek over on Prince of Wales Island (Individual, Juneau, AK - #23849.64351)	Tongass	AK
Lower Chatham Straight in Southeast Alaska (Environmental/Preservation Organization, Port Alexander, AK - #52943.64351)	Tongass	AK

Table B-2. Requested Exemptions from the Proposed Rulemaking.

Region 1 Northern

AREA	NATIONAL FOREST OR GRASSLAND	STATE
No more roadless designations in the State of Idaho! (Individual, Boise, ID - #6033.10200)	Multiple	ID
Exempt North Dakota (State Elected Official, Bismarck, ND - #17295.64351)	Multiple	ND
Absaroka-Beartooth Wilderness…the Stillwater deposit (Mining/Oil Company or Association, Washington, DC - #52224.53000)	Custer, Gallatin, Shoshone	MT, WY
Dakota Prairie Grasslands. (Business/Business Association, Bismarck, ND - #18348.10200)	Dakota Prairie Grasslands	ND
Exempt Treasure Mountain Ski Area (County Agency, Libby, MT - #43725.64351)	Kootenai	MT
Grasslands and lands in McKenzie County, North Dakota (Grazing Association, Watford City, ND - #43989.64391)	Little Missouri National Grasslands	ND

Region 2 Rocky Mountain

AREA	NATIONAL FOREST OR GRASSLAND	STATE
Exempt Wyoming (Lander, WY - #16279.93000)	Multiple	WY
Most of the rest of the "inventoried area" in South Dakota is also in various Grasslands. The use of any Grasslands for the roadless area designation is an anomaly. (State Elected Official, Pierre, SD - #27189.53400)	Multiple	SD
Beaver Park, Meade Co., SD (Individual, Rapid City, SD - #1260.10200)	Black Hills	SD
Exempt the Black Hills National forest (Individual, Upton, WY - #18448.10300)	Black Hills	SD
Sand Creek (Individual, Beulah, WY - #18442.10200)	Black Hills	WY
Delta County (County Elected Official, Delta, CO - #19118.64351)	Grand Mesa, Gunnison	CO
Crystal Creek, Uncompahgre, Tabeguache, Pilot Knob, Kelso Point, and Campbell Point (Timber Company, Montrose, CO - #13091.21000)	Grand Mesa-Uncompahgre	CO
Lands in the Grand Mesa-Uncompahgre National Forest adjacent to and including the West Elk Mine in Gunnison County, Colorado….And the North Fork Valley (Mining/Oil Company or Association, Denver, CO - #29952.93510)	Grand Mesa-Uncompahgre	CO
The West Elk Mine, located a few miles from the West Elk	Gunnison	CO

AREA	NATIONAL FOREST OR GRASSLAND	STATE
Wilderness Area (Business, No Address - #43736.53400)		
Medicine Bow National Forest: Bear Mountain, Coon Creek, Encampment River, Solomon Creek, Little Snake, Little Sandstone Creek, Big Sandstone Creek, Singer Peak, Deep Creek, Strawberry Creek, Bridger Peak, Mowry Peak, Illinois Creek, Platte River, Savage Run, Middle Fork, Libby Flats, French Creek, Snowy Range, Campbell Lake, Rock Creek, Tie Camp Timber Sale (Business, Laramie, WY - #27809.64351)	Medicine Bow	WY
The Beavers, Montezuma Bowl, Colorado. (Recreational Organization, Arapahoe Basin, CO - #29835.64351)	White River	CO
Pallavicini and the Alleys Trails…area within the Arapahoe Basin Special Use Permit (Recreational Organization, Arapahoe Basin, CO - #29835.64353)	White River	CO
McCoy Park and Mud Springs along the western boundary of Beaver Creek Resort (Business, Vail, CO - #29747.64351)	White River	CO
Roadless area along the western boundary of the Vail (Mountain) Resort special use permit area known as South Game Creek (Business, Vail, CO - #29747.64351)	White River	CO

Region 3 Southwestern

Coronado National Forest (Individual, Tucson, AZ - #9413.10210)	Coronado	AZ
Gila National Forest. (Individual, Silver City, NM - #19499.10213)	Gila	NM
Kaibab National Forest (Individual, Fredonia, AZ - #50630.90000)	Kaibab	AZ

Region 4 Intermountain

AREA	NATIONAL FOREST OR GRASSLAND	STATE
Roadless areas in Montana (Individual, Drummond, MT - #10870.64351)	Multiple	MT
No more roadless designations in the State of Idaho! (Individual, Boise, ID - #6033.10200)	Multiple	ID
Review of the Draft Environmental Impact Statement leads me to the conclusion that this new roadless initiative will be BAD to disastrous to the long-term utilization of this area (East of the Sierra Nevada's). (Individual, Bishop, CA - #25608.90000)	Multiple	CA, NV
Existing corridors that serve U.S. and State Routes in Utah	Multiple	UT

AREA	NATIONAL FOREST OR GRASSLAND	STATE
(State Agency, Salt Lake City, UT - #13556.64350)		
WATER RIGHT (WR) (Point of Diversion): -Kamas State Fish Hatchery 35-129, 35-8869, 35-8874, 35-8887, 35-8901 (Cedar Gulch) Wasatch Cache -65-2430 (New Canyon) Manti-La Sal -95-445 (Bowns Reservoir) Dixie -65-2429 (Deep Lake) Manti-La Sal 65-2429 (Shingle Mill) Manti-La Sal DAMS: -UT00086 (Deep Lake/Sanpete Co.) Manti-La Sal -UT00297 (Tamarack Lake) Ashley -UT00195 (Manning Meadow) Fishlake -Eastern Region: Duchesne County Upper Country Water Improvement District…Cow Canyon Strings… Water Right (WR) numbers are 43-3030 and 43-10445. -Moon Lake Electric…diversion dam on the Yellowstone River…WR number is 43-3239 -Farnsworth Canal and Reservoir Company, and Moon Lake Water Users deliver irrigation water through the Farnsworth Canal…WR numbers 43-1718, 43-1719, and 43-2532. -The US Bureau of Reclamation…Duchesne River through the Duchesne Tunnel…WR numbers include 43-341,43-343, and 43-344 -Rhoades Canal Company…Duchesne River and Big Springs…WR numbers are 43-147, 43-156, 43-219, 43-223, 43-225, 43-356, 43-358, 43-1214, and 43-3801. -Sheep Creek Irrigation Company…canals and storage reservoirs…Also, Spirit Lake …WR numbers include: 41-207, 41-215, 41-219, 41-220, 41-2414, 41-2826, 41-2830, 41-2861, 41-2913, 41-2915, 41-2960, 41-3295, and 41-3328. -Whiterock Irrigation Company…four active reservoirs…Chepeta Reservoir…Wigwam, Moccasin, and Papoose…WR numbers are: 43-505, 43-508, 43-512, and 43-3258 -Ouray Park Irrigation Company…dams…Whiterocks Lake and Cliff Lake….WR number is 43-3217. -Interstate Irrigation and Reservoir…Beaver Meadows Reservoir -Ashley Valley Reservoir Company…dams…Oaks Park Reservoir, Ashley Twin Lake, and Upper and Lower Goose Lakes… -Hoop Lake Reservoir and Irrigation Company…Hoop lake Reservoir…WR numbers are: 41-1425 and 41-2150. -Southern Region: The towns of Annabella, Antimony, Elsinore, Joseph, Levan, Lyman, Monroe, Teasdale, and Torrey have some, or all, of their municipal water sources within the IRA. -Manning Meadow Reservoir… -Southeastern Region: Points of Diversion: 05 Area LA SAL	Multiple	UT

AREA	NATIONAL FOREST OR GRASSLAND	STATE
MOUNTAIN. -WR numbers 05-14, 05-47, 05-572, 05-2130, and 05-2448… -Sole Supply…diversions on Mason Spring, Mason Draw, Beaver Creek Bear Creek and several unnamed drainages. -WR 05-2013- Moab Irrigation company…Mill Creek and its tributaries…The points of diversion…include Wilson Mesa diversion on the Wet Fork of Mill Creek, and the South Mesa diversion on the mainstem… -WR 05-1523-Grand County Water Conservancy District…The same two points of diversion for Wilson Mesa and South Mesa appear to be the ones in contention… -05/09 Area BLUE MOUNTAINS: WR 09-33 Bureau of Indian Affairs: This WR is on Hammond Canyon… -WR 09-125 and 09-300 Blanding Irrigation Company: A diversion on Dry Wash… -WR 05-672- Indian Creek Tunnel…Recapture Reservoir. -WR 09-447, 09-1270, 09-1580, 09-1581-Blanding City…Johnson and Indian Creeks -WR 09-1684-Blanding City: This is an application filed by the city on Dry Wash that has yet to be approved. -WR 09-158…on Coal Bed Creek…has also never been approved. -99 AREA -90-AREA NINE MILE CREEK… -91 AREA-PRICE RIVER: WR 91-4817; Represents a Diligence Claim filed by Indianola Irrigation Company for transmountain diversion from a tributary of Fish Creek for supplemental irrigation purposed in Sanpete County… -Water Right 91-343: Is owned by the Union Pacific Railroad on the White River for use at Soldier Summit. -93 AREA-SAN RAFAEL DRAINAGE: WR 93-997: Belongs to the Bureau of Reclamation…storage in Soup Bowl, Academy Mill, Slide Lake, and Grass Flat Reservoir -WR 93-983, 93-986, 93-3336- Horseshoe Irrigation Company of Spring City…from Black Canyon and Cedar Creek Drainages… -WR 93-2146, 93-2147, 93-2148, 93-2149, 93-2150, 93-2151, 93-2155, 93-2156, 93-2157, 93-2170, 93-2172, 93-2175, 93-921, 93-1020, and 93-1018-Cottonwood Creek Consolidate Irrigation Company…diversions on Indian Creek, Reeder Creek, and Black Canyon Creek, for the irrigation of high mountain meadows… -WR 93-1115- PacifiCorp…diversion of water from Deer Creek at the Deer Creek Mine portal, and from Huntington Creek for power generation at the Huntington Power Plant…the Deer Creek diversion. -WR 91-1174-Ephraim City: This is an application that remains unapproved, requesting a diversion of 40 cfs from the Seely Creek Drainage… -94-AREA-MUDDY CREEK DRAINAGE: WR 94-4, 94-5, 94-6, 94-7, 94-8, 94-830, 94-1197:		

AREA	NATIONAL FOREST OR GRASSLAND	STATE
-WR 94-33- Muddy Creek Irrigation Company… Julius Flat Reservoir… -WR 94-43- Muddy Creek Irrigation Company… -WR 94-98- PacifiCorp…This right is unapproved. -WR 94-80-Consolidated Coal Company…reservoir on the Muddy Creek…also unapproved. -WR 94-94-Ute Energy…also unapproved. -WR 94-86…in the name of Intermountain Consumer Power Association…remains unapproved. RESERVOIRS: WR 94-4-Willies Flat Reservoir… -WR 93-961- Jet Fox Reservoir: This is located on Cove Fork on Ferron Creek, and is used by Manti City for municipal and irrigation purposes… -SOUTHWEST REGION -WR 81-30: Under this water right, St. George city has a relatively large (but currently undeveloped) right in Goat Springs… -WR 81-686 (a23450)…springs and wells…particularly Alger Springs… -WR 81-970…municipal water supply for the entire town of Pine Valley… -WR 81-1132…St. George city…municipal water… -WR 97-675…municipal use in the town of Escalante…Under 97-2214 (a24248), the town has filed for an additional supply out of these same sources (using their allocation of the Flaming Gorge water-550 acre feet) to better meet the needs of growth being driven by the designation of the Grand Staircase Escalante National Monument (GSENM)… -WR 77-1768,77-1788, and 77-1792…to serve the municipal needs of the Elk Meadow Special Service District on Beaver Mountain…Beaver County… DAMS: -Yankee Meadow Reservoir (WR 75-980 to Parowan Reservoir and Irrigation company) and Upper Kents Lake (Water Right 77-1662 to Kents Lake Reservoir Company). WR 97-44 for Spectacle Lake, came up in the IRA, but the dam wasn't listed… -UTAH LAKE/JORDAN RIVER REGION…dams…Center Creek #1, Center Creek #2, Center Creek #3, Center Creek #5, Daniels, Christensen, Tibble Fork, Silver Lake, Silver Lake Flat, Lake Mary, Twin Lakes, and Red Pine. -WEBER RIVER/WEST DESERT REGION…dams owned by Fish Lake Reservoir Company, Farmington City, Davis County, and the Beaver & Shingle Creek Irrigation Company would be impacted by the proposed rule. The following public water suppliers would be impacted by the proposed rule: Ogden, South Ogden, North Ogden, Uintah Highlands, Riverdale, Farmington, Centerville, Fruit Heights, Kamas, Terra, and the Weber Basin Water Conservancy		

AREA	NATIONAL FOREST OR GRASSLAND	STATE
District. -…Stream gauges are funded 50 percent by the Division of Water Resources, the Division of WR, or other Utah water entities. Almost all of this data, however, is collected by federal agencies. The data is critical to both state and federal agencies to administer the Bear River and Colorado River Compacts, plan for the proper storage and release from reservoirs for maximum dam safety and for the ongoing planning to manage and develop, when necessary, additional water resources. The SNOTEL and Snow Data Measuring sites are critical for Utah's Cloud Seeding Program. MINES: -The phosphate-bearing tongue is within proposed areas in the following land tracts: T.2N.,R.19-20E., R.8-9E. and T.4S.,R.9-13E….mine at Little Brush Creek north of Vernal, the proposed new Archer Phosphate mine... -…the following land tracts: T.2N., R.19E.,T.1N., R.9E; T.3S., R.9-17W….DG&T quarry in northernmost Uintah County -…T.14 and 15S, R.6 and 7E., lying primarily under Candland Mountain….two coal beds of minable thickness, the Blind Canyon and Wattis -Two proposed areas in T.19S., R.5E. have moderate coal development potential. These two tracts bracket Wagon Road Ridge to the north and south and are somewhat removed from the nearest outcrops of coal along Ferron Canyon in T.20S., R.5E… -…the Wagon Road Ridge north area is essentially a 1/2 mile wide corridor that already contains an existing 2 mile long road that extends from the campground at Petes Hole Reservoir on the west, halfway to Josephite Point on the east…Ferron Canyon coal resource… -The proposed area primarily in T.16S., R5E. surrounds Black Canyon (State Elected Official, Salt Lake City, UT - #43918.90333)		
Grandview Trailhead, in the Duchesne District of the Ashley National Forest…The Grandview Trailhead provides the only easy access to the Granddaddy Basin area of the High Uintas Wilderness (State Elected Official, Salt Lake City, UT - #43918.90333)	Ashley	UT
Caribou National Forest (Individual, Ovid, ID - #18867.10210)	Caribou	ID
* Section 8, Township 12 North, Range 19 East, Mt. Diablo Base and Meridian; * The southern portion of section 4, Township 12 North, Range 19 East; * The northern portion of Section 9, Township 12 North, Range 19 East; and * The eastern portion of Section 7, Township 12 North, Range 19 East, As noted above these lands are immediately adjacent to lands presently under a Term Special Use Permit to Heavenly (permit	Humboldt-Toiyabe	CA, NV

AREA	NATIONAL FOREST OR GRASSLAND	STATE
#'s 4056/01 and 4056/02) or adjacent to privately held land which Heavenly owns or controls. …along the western side of the Carson Valley. …at the bottom of the slopes near the Kingsbury Grade (Nevada State Route 207), on land which Heavenly controls, and the existing resort facilities located on the Nevada side. (Business/Business Association, Stateline, NV - #29746.64353)		
Exploration and development activities will be significantly reduced or eliminated in the "roadless area" between Big Springs and Jerritt Canyon. (Mining/Oil Company or Organization, Washington, DC - #52224.93000)	Humboldt-Toiyabe	NV
National Forest Lands in Southern Lander County (Toiyabe, Shoshone and Toquima Ranges) …mining districts (Reese River, Birch Creek, Big Creek, Kingston, Washington, and Spencer Hot Springs). (County Elected Officials, Battle Mountain, NV - #43985.93500)	Humboldt-Toiyabe	NV
Manti District (Individual, Spring City, UT - #13482.83140)	Manti-La Sal	UT
Exempt Jesse Creek Roadless Area (Town or Municipality, Salmon, ID - #23369.64351)	Salmon	ID
Island Park, ID (Individual, No Address - #6762.71300)	Targhee	ID

Region 5 Pacific Southwest

AREA	NATIONAL FOREST OR GRASSLAND	STATE
In the Los Angeles area, Caltrans foresees a need for a new facility parallel to State Route 14 between State Route 138 and Interstate 210. (State Agency, Sacramento, CA - #28908.64350)	Angeles	CA
Boy Scout Camp Road, Camino Cielo, Gridley Road, Lockwood Valley Road, Matilija Road North …Matilija Road South, Rice Road, Oso Road, Foothill Road, Ojai Valley View Road, Santa Ana Road, Avenal Road, Koenigstein Road Goodenough Road, Piru Canyon Road The following roads provide access to the Santa Monica Mountains National Recreation Area from the Regional Road Network: Yerba Buena Road, Potrero Road, Pacific View Road, Hidden Valley Road, Carlisle Road, Deer Creek Road (County Agency, Ventura, CA - #17301.40200)	Angeles, Los Padres	CA
Buck Lake Wilderness (Individual, Chico, CA - #10596.83000)	Cleveland	CA
Land at the edge of the designated Lost Creek Inventoried	Lassen	CA

AREA	NATIONAL FOREST OR GRASSLAND	STATE
Roadless Area in the Lassen National Forest….Hat Creek Radio Observatory (University/Professional Society, Berkeley, CA - #52338.64351)		
City of Banning's Watershed, dams at South and East Fork of the Whitewater River, Riverside Flood Control District's weather measuring equipment and state seismic monitoring station at Raywood Flat on Section 31 and two radio facilities on Snow Peak Section 31 and the other in the southwestern area of Section 21 T1S R1E near Little San Gorgonio Peak Exempt Sections 36 T1S R1E and 30 T1S R2E and in the southeastern portion of Section 19T1S R2E, and Sections 1, 2 and 3 T2S R1E S.B.B.&M (Business, Encinitas, CA - #26031.64351)	San Bernardino	CA

Region 6 Pacific Northwest

AREA	NATIONAL FOREST OR GRASSLAND	STATE
National forests of Oregon (County Agency, John Day, OR - #16087.64351)	Multiple	OR
All the forests included in the Northwest Forest Plan (Individual, Arcata, CA - #1396.64351)	Multiple	CA, WA, OR
Maintain Alternative 2 in the DEIS, but exempt from the prohibition national forests within the coverage of the management directives established in the Interior Columbia Basin Ecosystem Management Project. (State Elected Official, Boise, ID - #18645.64400)	Multiple	CA, ID, MT, NV, OR, WY.
…This issue has been addressed and was resolved through the enactment of the Oregon Wilderness Act; Hells Canyon National Recreation Area Act; Northwest Forest Plan; and, the various Land and Resource Management Plans….the proposed rules [should] not include Oregon. (County Agency, John Day, OR - #16087.64351)	Multiple	OR
The Sullivan Lake area (Individual, Colville, WA - #8467.10210)	Colville	WA
The Olympic Peninsula (Individual, Beaver, WA - #8116.10200)	Olympic	WA
White Pass Ski Resort, near Packwood, Washington …The 800 acres of the Hogback Basin (Individual, Tacoma, WA - #17819.90331)	Wenatchee, Gifford Pinchot	WA
800 Acres deleted from the existing Goat Rocks Wilderness Area (White Pass' Hogback Basin) (Business, White Pass, WA - #17633.64353)	Wenatchee, Gifford Pinchot	WA
The Pelican Butte ski area (Individual, Rocky Point, OR - #284.64353)	Winema	OR

Region 8 Southern

Chattahoochee National Forest. (Individual, GA - #13341.83400)	Chattahoochee	GA

Region 9 Eastern

Chequamegon-Nicolet (Professional Society, Park Falls, WI - #18662.64251)	Chequamegon-Nicolet	WI
Nicolet National Forest…the Michigan trail system (Individual, No Address - #44085.91713)	Chequalmegon-Nicolet	WI
Chippewa National Forest (Individual, Golden, CO - #12935/64350)	Chippewa	MN
Monongahela National Forest (County Elected Official, Marlinton, WV - #13968.10210)	Monongahela	WV
The 6% of the Ottawa National Forest [proposed for closure in the 1986 Forest Plan] (Individual, Escanaba, MI - #118.10213)	Ottawa	MI
Exempt the Ottawa National Forest (Individual, Bruce Crossing, MI - #17512.10200)	Ottowa	MI
Norwich Plains Area (Individual, Bruce Crossing, MI, - #17512.10200)	Ottowa	MI
Shawnee National Forest (Individual, No Address - #16460.10210)	Shawnee	IL
I am asking that the White Mountain National Forest be exempt from the executive order. (Individual, Rumford, ME - #25022.64351)	White Mountain	NH, ME

Region 10 Alaska

AREA	NATIONAL FOREST OR GRASSLAND	STATE
The Chugach National Forest…on the Kenai Peninsula…along the Seward Highway (Timber Association, Ketchikan, AK - #43609.64351)	Chugach	AK
Please do not include the Tongass or Chugach forests in the final roadless plan. (Federally Elected Official, Anchorage, AK - #13560.92300)	Chugach, Tongass	AK
The State of Alaska is revising its regional ferry/road system to allow more efficient and economical travel throughout Southeast Alaska. Access must be preserved for the State's regional ferry/road transportation system. 1. On Prince of Wales Island, communities that are connected, or may be connected in the future by roads and powerlines include: Hydaburg, Klawock, Craig, Hollis, Kasaan, Thorne Bay, Naukati, Coffman Cover, Whale Pass, Calder mine, Laboucher Bay, Point Baker, and Port Protection. In addition, hydroelectric sites in the higher elevations of Prince of Wales Island need to be identified in order to eventually replace or supplement electric demands in these communities.	Tongass	AK

AREA	NATIONAL FOREST OR GRASSLAND	STATE
2. The current road access between Cape Pole and Edna Bay must be preserved. In addition, a hydroelectric facility servicing those communities may be feasible in the Mount Holbrook area on Koskiusko Island. 3. There must be a road corridor and power line corridor between Kake, Kupreanof and Petersburg to be developed when future economics make the project feasible. 4. Sitka must be allowed to have a road corridor to Rodman Bayon Peris Straits for potentially more efficient ferry access. 5. Although not warranted at the present time, there must be provisions for a future road and electrical intertie between Hoonah and Tenakee Springs. 6. Allowances must be made for a power line easement between Juneau, Greens Creek mine, and Hoonah. 7. Road access from Skagway and Haines to Juneau needs too be preserved along both shorelines of Lynn Canal so that the best access to Juneau can be preserved. In case the Taku River road becomes more viable, a road corridor must be included in any transportation plan. 8. In the future, Rowan Bay may find a source for hydroelectric power to replace diesel generation. The best sources probably are in the watersheds along the ridge that fronts onto Chatham Straits. (Tribal, Juneau, AK - #44005.93000)		

Appendix C Index of Public Concerns

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- End the net loss to taxpayers of road construction 1-6
- Set an example for the world 1-6
- Encourage improved stewardship of roaded areas 1-6
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The final rule should assure that roadless areas are protected in perpetuity. 1-8

The scope of the final rule should be broadened to meet the stated purpose and need. 1-9

The Forest Service should clarify to the general public that the proposed rule does not close any existing roads or motorized trails or limit public access to national forests. 1-10

The Forest Service should dismiss the “senior citizen and disabled access” argument against the proposed rule. 1-10
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The Forest Service must consult with each effected nation if the final rule and record of decision goes beyond the proposed action. 2-5
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The Chief of the Forest Service should be solely responsible for carrying out policy and directing the Forest Service. 2-14
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Individual states and counties should be given greater input and control over forest management on federal lands. 2-15
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The Forest Service should not purposely cause confusion by separately releasing several documents that are inherently integrated. 2-30
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The Tongass National Forest exemption is politically motivated 2-32
The public input process is a means to hide the political use of this initiative 2-32
The Forest Service should delay the proposed rule until Congress completes its investigation of improprieties in developing the rule. 2-32
The Forest Service should instruct its agency employees to speak with sensitivity and forthrightness. 2-32
The Forest Service should not disseminate false reports that forests have regrown when they are hardly replanted. 2-33
The Forest Service should not mislead the public about which roads and trails would be closed as a result of this rule. 2-33
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The Forest Service should reevaluate the number of roads in New England and Mid-Atlantic forests. 4-47
The Forest Service should re-inventory areas within the Hoosier National Forest. 4-48
The Forest Service should resurvey Arizona to ensure accurate roadless acreage. 4-48
The Forest Service should identify additional unroaded areas in the Chippewa and Superior National Forests. 4-48
The Forest Service should carry out road classification on a regional basis. 4-49
The Forest Service should consider that the speed with which this initiative is being implemented is causing inaccurate roadless classifications. 4-49
The Forest Service should create a new category of “unroaded” areas. 4-50
The Forest Service should change the definition of “unroaded” to “a portion of an inventoried roadless area in which no classified road has been constructed since the area was inventoried.” 4-50
The Forest Service should refer to areas with pre-inventory roads as semi-roadless areas and clarify how they will be affected by this rule. 4-50
The Forest Service should not designate roadless areas which contain 2477 rights of way through them. 4-50
When delineating roadless areas, the Forest Service should classify temporary roads as roads. 4-50
The Forest Service should include historic roads in its roadless area inventory. 4-50
The Forest Service should include all existing roads and 4-wheel drive routes in the roadless area inventory. 4-51
The Forest Service should recognize the existence of trails less than 50 inches wide. 4-51
The Forest Service should clarify whether decommissioning or obliterating roads would create a roadless area. 4-51
The Forest Service should consider for roadless designation, areas with a few roads that could be blocked or obliterated. 4-51
The Forest Service should not allow “ghost” roads to disqualify an area as roadless. 4-51
Areas with primitive roads, jeep trails, or classified roads should not be disqualified from roadless designation. 4-52
The Forest Service should clarify the status of “phantom roads” to ensure that road construction could not be performed under the guise of repairing existing roadways. 4-52
The Forest Service should explain how the roaded portions of inventoried roadless areas will be delineated. 4-52
The Forest Service should consider removing areas that cannot be harvested with temporary roads from the roadless area classification. 4-52

The Forest Service should discontinue the use of the term roadless to describe areas which contain forest products. 4-52
The Roadless Area designation should be eliminated. 4-52
The Forest Service should be consistent in statements regarding the possible future designation of roadless areas as wilderness areas. 4-54
The Forest Service should judge each roadless area independently on its own merits for wilderness designation. 4-54
The Forest Service should manage all roadless areas so as to protect their eligibility for wilderness designation. 4-54
The Forest Service should designate and maintain all remaining roadless areas as wilderness in perpetuity. 4-54
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The Forest Service should quickly assess lands which qualify as wilderness. 4-55
The Forest Service should designate wilderness areas in response to population increases. 4-55
The Forest Service should use watershed boundaries to delineate roadless areas. 4-55
The Forest Service should clarify whether stewardship activities and temporary roads would disqualify an area from potential wilderness designation. 4-55
The Forest Service should consider designations other than wilderness. 4-56
The Final EIS should recommend to the President that all roadless areas be designated national monuments. 4-56
The Forest Service should postpone the wilderness recommendation process until the next round of forest plan revisions 4-56
The Forest Service should not attempt to designate any more wilderness areas. 4-56

Chapter 5 Environmental Effects 5-1

The Forest Service should consider the ecological value of roadless areas. 5-2
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The Forest Service should include humans as part of the ecosystem. 5-2
The Forest Service should reconsider the historic range of variability as a viable management goal. 5-3
Due to legal and practical limitations 5-3
Due to the dynamic nature of the historic environment 5-3
The Forest Service should develop plans for managing large-scale disturbances in roadless areas. 5-4
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Catastrophic precipitation and runoff events 5-4
The Forest Service should consider the use of environmental buffer zones 5-4
Around roadless areas 5-4
Use roadless areas as buffer zones adjacent to wilderness 5-5
Delete any discussion and reference to buffer zones around wilderness 5-5

The Forest Service should address the litter left by recreational users. 5-5
Through user financed litter management 5-5
By reducing road access 5-5
By limiting motorized use of the backcountry 5-6
By allowing motorized users to clean up the backcountry 5-6
The Forest Service should control noise pollution on system lands. 5-6
By prohibiting roadbuilding 5-6
By restricting off-highway vehicle use 5-7
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For ecosystem health 5-7
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The Forest Service should protect a wide range of ecosystem types and elevations. 5-8
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The Forest Service should consider the benefits of human activity to the ecosystem. 5-9
The Forest Service should explain how nitrogen from gasoline impacts the environment. 5-9
The Forest Service should address the impacts of building roads on small sized ecosystems. 5-9
The Forest Service should consider the impacts of cattle on springs, streams, and native grasses. 5-9
The Forest Service should rewrite the ecological factors section in the Draft EIS in an objective manner, providing specific quantitative analysis and evidence. 5-10
The Final EIS should include an analysis of the effects of the proposed rule on species diversification and the water cycle. 5-11
The Forest Service should separate the discussion of the effects of roads from the effects of road uses. 5-11
The Forest Service should provide data indicating the negative effect of the road system on the environment. 5-11
The Forest Service should address the effects of off-highway vehicle use on roadless areas and wilderness values. 5-11
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To assess the importance of roadless areas 5-12
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The Forest Service should use roadless areas to study ambient noise on a forest-by-forest basis. 5-15
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By considering additional alternatives 5-16
The Forest Service should eliminate timber harvest for “forest health.” 5-16
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The Forest Service should justify its claim that roadless areas are better able to respond to natural disturbances than roaded areas. 5-17
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The Forest Service should reconsider preserving roadless areas based on the assumption that species are static. 5-29
The Forest Service should ensure that wildlife is not displaced by timber harvest operations. 5-29
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By instituting seasonal closures for motorized vehicles 5-29
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The Forest Service should provide comprehensive protection to wildlife populations on the Tongass National Forest 5-30
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Negative effects to wildlife 5-35
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The Forest Service should compare the effects of roadless areas and managed forest on wildlife, using comprehensive wildlife data. 5-41
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By adopting alternative 4 5-42
In the Tongass 5-42
The Forest Service should develop a management plan that assures wildlife corridors between key wilderness areas. 5-43
The Forest Service should consider the fragmentation effects of roads. 5-43
Road fragmentation analysis should include federal, state, and county roads. 5-44
The Forest Service should avoid using grizzly bear recovery potential as a measure of effects of the proposed rule on fragmentation. 5-44

The proposed rule should more clearly distinguish between natural and human caused fragmentation. 5-44
The Forest Service should use consistent units of measure when addressing fragmentation. 5-45
The Forest Service should prohibit road-building to protect aquatic species. 5-45
The Forest Service should improve road building practices to protect fish stocks. 5-45
By paying timber contractors to repair or close roads 5-46
The Forest Service should protect the aquatic habitat associated with streams draining late-successional and old-growth forests. 5-46
The Forest Service should acknowledge that science supports the restoration of habitat as the key to the salmon fisheries recovery. 5-46
The Forest Service should maintain roads to improve salmon resources. 5-46
The Forest Service should protect the freshwater mussel populations of the Wolf River in the Holly Springs National Forest through roadless designation. 5-47
The Forest Service should address the effects of poor forest management on aquatic resources. 5-47
The Forest Service should consider the need for roadless areas as threatened and endangered species habitat. 5-48
On the Tongass National Forest 5-49
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The Forest Service should eliminate roads on national forest to gain wolf habitat. 5-50
The Forest Service should allow timber harvest to improve forage in grizzly bear habitat. 5-50
The Forest Service should reintroduce grizzly bears and wolves into the lower Rockies and move cattle back to private ranches. 5-50
The Forest Service should consider the effects of excluding inventoried and non-inventoried roadless areas on sensitive, threatened and endangered species. 5-50
The Forest Service should analyze the affects of roads on rare snails and the endangered Apache trout. 5-50
The Forest Service should clarify discrepancies regarding the number of recovery projects for threatened and endangered species. 5-51
The Forest Service should protect roadless areas in order to mitigate the negative effects on watersheds. 5-51
The Forest Service should use best management practices to mitigate the effects of road building on water and stream quality. 5-52
The Forest Service should evaluate the effect of the proposed rule on water yield. 5-52
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The Forest Service should conduct forest management to maintain watershed health. 5-52
The Forest Service should prohibit activities that damage watersheds. 5-53
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Until watershed area units can be identified 5-54
Ban cattle and off-highway vehicles 5-54
The Forest Service should allow timber harvest. 5-54
Despite past damage to watersheds 5-54
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The Forest Service should consider the effects roads and road construction have on watersheds. 5-55
Drainage patterns 5-55
Sedimentation 5-55
The Forest Service should address the handling of toxic substances in roadless areas. 5-55
The Forest Service should address the effects of log dumps on the marine environment. 5-56
The Forest Service should consider the effects of agricultural/industrial pollution on watersheds. 5-56
The Forest Service should consider the importance of roadless areas as sources of clean drinking water. 5-57
Roadless areas are important 5-57
Roadless areas are not important 5-57
The Forest Service should consider the importance of forests for water retention. 5-57
The Forest Service should address the effects of the proposed action on the access to water resources 5-58
The Forest Service should address the effect of the proposed rule on the ability of local authorities to address problems associated with the Total Daily Maximum Load. 5-58
The Forest Service should revise sections of the proposed rule dealing with water resources to include recent scientific information. 5-58
The Forest Service should indicate where impaired watersheds are located in relationship to roadless areas. 5-58
The Cumulative Effects Analysis for water quality should include an assessment of forestry practices and other actions conducted on private inholdings and adjacent lands. 5-59
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The Forest Service should protect unique geologic formations 5-60
The Forest Service should consider the effects of certain activities on soil erosion. 5-61
Roads and road construction cause erosion 5-61
Off-highway vehicles increase erosion 5-61
Erosion is natural 5-61
The Forest Service should consider that road construction will introduce soil bacteria. 5-61
The Forest Service should address the potential for fire induced soil erosion. 5-62
The Forest Service should verify the primary contributor to erosion in the forest. 5-62
The landslide risk map on page 3-37 of the Draft EIS should be updated. 5-63
The Forest Service should analyze the geologic hazard mitigation opportunities that will be lost if the proposed rule is implemented. 5-63
The Forest Service should explain how air quality can be better in roadless areas as compared to managed areas. 5-64
The Forest Service should define where Class 1 air quality areas are in relation to National Forest System Lands. 5-64
The Forest Service should not preclude adoption of Alternative 1 because of changes in air quality. 5-64
The Forest Service should evaluate the role of anthropogenic activities on carbon dioxide exchange. 5-64
The Forest Service should refrain from performing prescribed burns in roadless areas because of their effect on air quality. 5-65

The Forest Service should address the effects of the proposed rule on air quality. 5-66
The Forest Service should discuss the effects of trees on air quality. 5-66
The Forest Service should evaluate the amount of air pollution created by snowmobiles. 5-66
The Forest Service should acknowledge that significant air quality problems on National Forest System lands are not due to sources on those lands. 5-67
The Forest Service should consider the effectiveness of roadless area protection in mitigating global environmental problems. 5-68
Protection will have a positive effect 5-68
Protection will have a negative effect 5-68
National policies should be aimed at minimizing the consequences of global warming and drought. 5-68
The Forest Service should address the resource pressures the proposed rule would place on global forests. 5-68
The Forest Service should address the importation of forest products. 5-69
The Forest Service should avoid accessing new areas until we understand more about greenhouse warming and global climate change. 5-69
The Forest Service should implement the proposed rule for world ecological welfare. 5-70

Chapter 6 Human Uses and National Forest System Land Management 6-1

The Forest Service should clarify whether citizens have the right to treat federal lands as their private property. 6-2
The Forest Service should focus management on achievement of a fair balance of uses while minimizing damage to the environment. 6-3
The Forest Service should restrict all commercial and recreational activities that threaten the health and integrity of the ecosystem. 6-3
The Forest Service should increase restrictions on companies that extract natural resources from roadless areas to encourage greater efficiency. 6-4
Best management practices for timber harvest, road construction, and mining should be consistently implemented and evaluated for effectiveness. 6-5
The Forest Service should include the Tongass National Forest in logging and road building restrictions to prevent irremediable damage to soils, wildlife, and the tourism and subsistence economies which depend upon them. 6-5
The Forest Service should refocus forest travelway system management on the needs of all users rather than those of the commercial timber industry. 6-7
Non-timber forest products industry 6-7
Recreational users 6-7
The Forest Service should streamline the road system by maintaining arterial roads while closing smaller peripheral routes and logging roads. 6-8
The Forest Service should reduce road densities on a forest-by-forest basis through the forest planning process. 6-8
Collaboratively develop strategic travel management plans 6-8
The Forest Service should not classify currently unclassified roads. 6-8
The Forest Service should provide management direction for “Public Roads.” 6-9

The Forest Service should enumerate and quantify the foreseeable impacts of road system management on roadless ecosystems. 6-9
Existing road system 6-9
Road construction and reconstruction, general 6-9
Cumulative effects of road construction in Alaska 6-10
The final EIS should identify all projects affected by the road building moratorium and better elaborate on the need for the proposed rule. 6-10
The Forest Service should base its effects analysis on the impacts of temporary rather than permanent roads. 6-10
The Forest Service should implement the proposed prohibition on road construction and reconstruction. 6-12
The Forest Service should prohibit road construction and reconstruction in all portions of inventoried roadless areas, including the "roaded" portions. 6-12
The Forest Service should end road building to prevent adverse impacts to the ecosystem caused by greater public access. 6-13
Increased poaching of plants and wildlife 6-13
The Forest Service should demonstrate the connection between poaching and road access. 6-13
The Forest Service should open existing roads rather build new roads. 6-14
The final rule should assure no net gain of road miles by requiring removal of equal road mileage for every special exemption. 6-14
The Forest Service should halt reconstruction on the Loop Road in Fremont County, Wyoming. 6-14
The final rule should allow stabilization but not full reconstruction of badly deteriorated roads. 6-14
The Forest Service should not allow temporary roads to be built. 6-14
The Forest Service should allow temporary roads for timber harvest as long as they are promptly closed. 6-15
Roads associated with timber harvest projects should be built to minimum standards, restored to natural conditions upon completion of the project, and paid for by the timber purchaser. 6-15
The Forest Service should allow temporary roads for salvage harvest. 6-15
The Forest Service should reassess the assumption in the Draft EIS that logging roads built into a roadless areas would remain open to the public. 6-15
Roads built for logging and maintenance should be made off limits to the general public by means of barriers and gates. 6-16
Stringent road building standards need to be implemented to protect salmon fisheries and the fishing industry. 6-16
Funding should be linked in any timber sale plan to safeguard stricter road building standards. 6-16
The Forest Service should explain how best management practices for road construction minimize environmental impacts. 6-16
The Forest Service should consider the use of plastic culverts for road projects. 6-16
The Forest Service should clarify whether the final rule will prohibit road maintenance in inventoried roadless areas. 6-17
The Forest Service should revise guidelines for maintenance and reconstruction to ensure that existing roads are preserved in useful condition. 6-17

The Forest Service should delete the reference to road maintenance on page 1-4 of the Draft EIS or address maintenance as part of an alternative. 6-17
The Forest Service should consider road construction and road reconstruction separately. 6-17
The Forest Service should reconsider the buffer width between existing roads and roadless areas. 6-17
Road buffers should be clearly defined and ecologically justified by the Forest Service. 6-18
The Forest Service should clarify whether there will be a setback between roadless areas and adjacent state highways that would allow for road reconstruction. 6-18
The final rule should permit road construction, realignment, and reconstruction of federal and state highway systems. 6-18
The final rule should be consistent with commitments made in the Environmental Streamlining National Memorandum of Understanding regarding expedited highway and transit projects. 6-20
The Forest Service should limit exceptions for road construction in the proposed rule..... 6-20
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Require inholders to take responsibility for fireproofing property 6-21
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The Forest Service should consider broadening exceptions in the final rule to include special use permits for scientific research projects. 6-23
Any exceptions made in the proposed rule should be subjected to the proper National Environmental Policy Act analysis process and independent scientific review. 6-23
While the proposed rule claims to ban only new roads, the Forest Service should clarify whether it would lead to closure of existing roads and trails. 6-24
The Forest Service should report the rate of current road decommissioning and the effects of the rule in the Final EIS. 6-25
The Forest Service should assure no net loss of road and trail miles. 6-25
The Forest System should maintain access to the road system for search and rescue..... 6-25
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The Forest Service should give priority to closing private roads which extend into the national forests but which are not accessible to the public. 6-27
The final rule should restore inventoried roadless areas by decommissioning roads and returning these areas to their unroaded conditions. 6-27
The Forest Service should pursue the decommissioning of specific roads. 6-27
The Forest Service should not decommission roads. 6-28

The Forest Service should reconsider the methods used to decommission roads. 6-28
Do not cover roads with cut brush 6-28
Repair tank traps 6-28
Reseed or abandon rather than recontour 6-28
Remove asphalt pavement on decommissioned roads 6-28
The process of closing or decommissioning roads can be more environmentally destructive than the presence of roads. 6-28
The Forest Service should convert existing roads to trails rather than eliminate them. 6-29
The Forest Service should clarify whether the proposed rule would affect new trail construction and maintenance. 6-30
The proposed rule should not be implemented because it bans most "ground disturbing activities" which will preclude necessary trail maintenance and construction. 6-30
The Forest Service should avoid building trails in roadless areas. 6-30
The final rule should prohibit the construction of new motorized trails in roadless areas. ... 6-30
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The Forest Service should close all unauthorized or unofficial roads to all forms of motorized travel. 6-33
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The Forest Service should not encourage the creation of illegal trails by incorporating them into the official trail system. 6-33
The Forest Service should prevent Illegal trail development by maintaining existing trails and creating more trails. 6-34
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The Forest Service should address whether additional timber harvest will occur after the year 2004. 6-42
The Forest Service should discontinue giving Plum Creek Corporation timber credits..... 6-43
The Forest Service should continue active timber management on Forest System lands. 6-43
The Forest Service should allow roads for timber management within the National Forest System lands. 6-43
The Forest Service should not adopt the proposed rule inasmuch as it is just an excuse for the fact that national forests have failed to meet their own set targets for timber production within existing forest plans. 6-44
The Forest Service should not set aside any matrix forest as unroaded under the proposed rule. 6-44
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Exempt Pelican Butte 6-97
Do not exempt Pelican Butte 6-98
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Exempt Hogback Basin 6-99
Do Not Exempt Hogback Basin 6-99
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Limit access to prevent discovery and/or damage..... 6-109
Given that the proximity of a road is the best predictor of whether an archeological site will be vandalized, the final rule should protect roadless areas. 6-109
By keeping existing road definition 6-109
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As required by Council on Environmental Quality Regulations, the Forest Service should conduct a heritage resources cumulative effects analysis for all alternatives. 6-110
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By providing sufficient funding to field archaeologists 6-110
The Final EIS should provide a detailed analysis of the paleontological resources that are present in areas proposed for closure. 6-111
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The Forest Service should consider that the proposed rule will restrict access for recreation. 6-113

The Forest Service should consider that the proposed rule will restrict access for the elderly, very young, and/or handicapped. 6-113
The Forest Service should clearly state that access to National Forest System lands means the legal right for a person to simply be present on public land and has nothing to do with permitted activities or mode of transportation. 6-114
There are more than enough roads to meet the needs of the elderly and handicapped and allow them to experience public wildlands. 6-114
The Forest Service should refute the contention that non-motorized activities in roadless areas are limited to the wealthy, elite, and physically fit. 6-114
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The Forest Service should consider a rotation system for open and closed roads. 6-115
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The Forest Service should develop special permits for disabled individuals. 6-116
The Forest Service should allow motorized access to only those over 65 years of age. 6-116
In some roadless areas the Forest Service should provide senior citizen paths, wheelchair access, and short loops for sightseeing. 6-116
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Develop remote interior camping sites. 6-116
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The final rule should explicitly guarantee aviation access to existing public use airports within designated roadless areas. 6-117
The Forest Service should keep existing roads and trails open to public access. 6-118
The Forest Service should retain roads for logging in an unmaintained state and open to off-road vehicle use. 6-119
The Forest Service should not close unmaintained roads. Unmaintained roads should not become classified or upgraded for travel in stock vehicles. 6-119
If a road is of historical or scenic significance, the Forest Service should not take away recreational access. 6-120
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Motorized 6-120
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It causes no long term damage 6-125
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The proposed rule should restrict motorized recreational use. 6-126
The Forest Service should eliminate off-road travel. 6-126
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Off-road vehicles should be allowed only on designated and signed official trails. 6-134
The Forest Service should restrict off-road vehicles to established roads only and ban them from trails. 6-134
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The Forest Service should disclose dispersed recreation data. 6-143

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Recreational use of public lands should be considered separately from commercial uses in the proposed rule. 6-143
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The Forest Service should address whether the proposed rule will result in a large recreation land base for a very small segment of the population. 6-144
The Forest Service should protect roadless areas for the benefit of dispersed non-motorized backcountry recreationists. 6-144
The Forest Service should address the issue of crowding of motorized users on National Forest System lands. 6-145
The Forest Service should address the fact that motorized access is inherently incompatible with the very qualities users want to experience. 6-146
The Forest Service should address the increasing conflicts between types of recreational users. 6-146
The Forest Service should facilitate the use of less utilized roadless resources. 6-147
The Forest Service should develop a plan to accommodate displaced off-highway vehicle users. 6-147
The Draft EIS should include an evaluation of the impact of displaced usage on all National Forest System lands. 6-147
Natural phenomena cause more environmental damage than human recreational or commercial activities, so restricting human activities will not solve these environmental problems. 6-148
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Rather than close areas or restrict use, the Forest Service should educate people about protecting the land. 6-150
The Forest Service should educate the public about the differences between national parks and national forests. 6-151
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The Forest Service should only allow motorized recreation in limited areas where the agency has sufficient resources to actively enforce regulations. 6-153
The Forest Service should adjust personnel work schedules to assure weekend patrols for motorized travel enforcement. 6-153
The licensing of all-terrain vehicles should be encouraged to aid in the enforcement of users' illegal actions. 6-154
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The Forest Service should address the unwillingness of local Forest Service staff to implement roadless protection. 6-154
Forest Service employees do not support this proposed rule 6-155
The Forest Service should assure that the final rule will be consistently implemented and enforced. 6-155
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The Forest Service should allow the construction of private roads in close proximity to designated roadless areas to minimize environmental damage. 6-160
The Forest Service should allow access to existing roads and new road construction for private property access inasmuch as building alternative route on private land would cause greater environmental damage. 6-161
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The Forest Service should address current deficiencies in the evaluation and appraisal of proposed land exchanges. 6-162
The Forest Service should refrain from selling or trading public forest land for development. 6-162
The Forest Service should exempt lands exchanged under P.L. 105-335 from the proposed rule. 6-163
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The Forest Service should consider the transfer of effects of timber harvest to non-federal lands which may result from the final rule. 6-165
The Forest Service should provide the science, information, and incentive programs necessary for private, state and foreign producers to provide an increased, sustainable share of the timber and livestock production in the United States. 6-166
The Forest Service should evaluate the value of unlogged and unroaded areas as protection for private property from landslides and flood damage. 6-166
The Forest Service should address the off-site impacts of expanding wildlife populations. 6-166

Chapter 7 Social and Economic Considerations 7-1

The Forest Service should preserve roadless areas for the non-commodity values they provide. 7-2
For escape from the urban environment 7-3
For spiritual renewal 7-3
For recreational opportunities 7-4
For scientific study 7-4
For their educational value 7-4
The Forest Service should consider that there are few people who really want solitude or are willing to walk to find it. 7-5
The Forest Service should not dedicate 60 million roadless acres as a “spiritual and psychological resource” for nature worshippers. 7-5
Roadless Areas should not be protected as reference areas for research and teaching as Research Natural Areas are better for that purpose. 7-5
The Forest Service should explain how much acreage is needed to achieve the "good feeling" of knowing that there are roadless areas. 7-5
The Forest Service should not allow this proposal to infringe upon historic, traditional, and cultural uses. 7-6
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. 7-7
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Restrictions on road maintenance will negatively affect subsistence access 7-8
The Forest Service should address the impacts its decisions will have on the family and family recreation. 7-8

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The Forest Service should explain how scenic quality is being addressed..... 7-9
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Road building and other forest management activities should be prohibited to preserve scenic beauty and aesthetic experiences. 7-10
The Forest Service should assure that the final rule will benefit future generations. 7-11
Preserve for future generations 7-11
Allow future generations to recreate 7-12
The Forest Service should reevaluate its economic analysis of the importance of forest resources to the economy. 7-14
The Forest Service should expand its economic analysis to include a quantitative assessment of a complete range of forest resources..... 7-15
The proposed rule skews the economic analysis of reductions in timber harvest. 7-15
Protections for roadless areas should be determined on a site-by-site cost/benefit basis during forest planning. 7-15
The Forest Service should include economic data from individual counties. 7-15
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Analysis in the proposed rule should be based on sound science, not on economics or the desire to avoid litigation..... 7-16
The proposed rule should be based on sound, sustainable economics with the future in mind, not narrow interests. 7-16
The Forest Service should complete a thorough cost/benefit analysis for the proposed rule as a whole. 7-17
The Forest Service should consider the relative economic worth of recreation in relation to resource extraction..... 7-17
The Forest Service should reconsider the assertion that substituting recreation income for timber harvest can provide superior economic benefits. 7-18
The Forest Service should encourage environmental protection rather than resource extraction because it offers superior economic benefits. 7-19
The Forest Service should better analyze and address the economic effect the proposed rule will have on the timber industry and its employees. 7-22
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. 7-24
Maintain status quo so there will not be adverse economic consequences 7-25
The Forest Service should consider the impacts on jobs indirectly related to the timber industry. 7-26
The Forest Service should recognize that the proposed rule will have minimal impacts on timber dependent communities..... 7-26
The Forest Service should not use Rural Development funding to mitigate impacts of the proposed rule. 7-27
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. 7-27

The Forest Service should analyze the effects of the proposed rule on timber prices and housing construction costs. 7-27
The Forest Service should address the cumulative effects of the recently proposed rulemaking initiatives on small businesses. 7-27
The Forest Service should reevaluate its analysis and projections regarding employment in the timber industry and forest dependent communities. 7-28
Technological advancements in harvest techniques account for job loss in the timber industry 7-30
Foreign export of timber accounts for job loss in the timber industry 7-30
Cyclical fluctuations in the demand for forest products can account for job losses and mill closures 7-30
Timber workers and communities should adapt to a changing job market. 7-30
Roadless areas attract a highly motivated, well-educated work force, and provide new and innovative technological and communication based jobs 7-32
Unemployment is at an all time low and workers can easily relocate 7-32
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 7-32
The Forest Service should not attempt to counteract the macroeconomic forces causing most job loss in the timber industry with federal timber flow policies 7-32
The Forest Service should help displaced timber workers and communities financially with relocation, education, employment, and/or compensation 7-32
The suggestion that a government payment can be made to areas negatively impacted by the loss of timber harvest revenue is not acceptable 7-33
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. 7-33
The Forest Service should address the socio-economic impacts of the proposed rule on outfitters and guides working in roadless areas. 7-34
The Forest Service should consider the effects of the proposed rule on potential job loss for Forest Service employees 7-34
The Forest Service should consider the economic impacts of including the Tongass National Forest in the proposed rule. 7-35
Roadless protection would hurt southeast Alaska's economy 7-35
Roadless protection would benefit both southeast Alaska's economy and the national economy 7-35
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. 7-36
The Forest Service should consider the effects the proposed rule will have on surface transportation options in Alaska. 7-36
The Forest Service should analyze the economic effects of the proposed rule on Alaskan railroad companies. 7-36
The Forest Service should include the Tongass National Forest in the proposed rule for the benefit of commercial fisheries and the fishing industry. 7-37
The Forest Service should eliminate subsidizes for road building and timber harvest on the Tongass. 7-37
Each timber sale in Alaska should include analysis of the resulting potential loss of tourism revenue 7-38

The Forest Service should balance protection of fisheries and wildlife habitat with protection of timber harvesting levels and roading on the Tongass. 7-38
The Forest Service should verify economic statistics in the DEIS. 7-39
The Forest Service should consider the negative impacts of declining federal timber revenue payments to rural counties..... 7-40
The Forest Service failed to adequately evaluate the contributions to Payments In Lieu of Taxes funds from ski areas within roadless areas. 7-40
The Forest Service should consider that the purchase of private land to preserve scenic value will have little effect on local tax bases. 7-41
The Forest Service should do away with the trust fund and timber receipt programs..... 7-41
The Forest Service should not support Senate Bill 1608 which would require increased timber harvest to fund county schools. 7-41
The Forest Service should reconsider the method used for funding counties from timber and grazing receipts. 7-41
The Forest Service should analyze the economics of livestock grazing on National Forests and Grasslands. 7-42
Eliminate grazing subsidies..... 7-42
Curtail grazing..... 7-42
Continue current grazing..... 7-42
The Forest Service should consider the effect the roadless initiative will have on the coal and oil and gas industry. 7-43
The Forest Service should reevaluate the full social and economic effects of the proposed rule on present and future mineral exploration, production, and development. 7-44
The Forest Service should not delay approval of mineral operations, including exploration, surface activities, and development. 7-46
The Forest Service should assess the potential loss of mineral lease income that may result from the proposed rule. 7-47
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. 7-48
The Forest Service should address the feasibility and cost of mining inside roadless areas or in areas surrounded by roadless areas. 7-48
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. 7-48
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. 7-49
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. 7-49
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. 7-49
The Forest Service should address the consequences of reduction of its traditional revenue sources. 7-53
The Forest Service should include the costs of litigating this proposal in agency costs. 7-53

The Forest Service should select a more prohibitive alternative because of the savings to the agency and taxpayers due to lower implementation costs. 7-53
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. 7-54
Forest Service funding should be increased..... 7-54
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..... 7-54
The Forest Service should assure that conservation dollars are spent for that purpose..... 7-55
The Forest Service should disclose the costs of managing roads versus the costs of fire management. 7-55
The Forest Service should explain how monies collected for removing timber and slash for fire prevention purposes were spent. 7-55
The Forest Service should update its analysis of the long-term costs of fire suppression versus costs of fuel treatment..... 7-55
The costs of fire management and regeneration should be subtracted from the value of the timber products harvested to effect that mitigation. 7-56
The Forest Service should reevaluate agency costs of fuels reduction and increased fire hazards in roadless areas. 7-56
The Forest Service should lobby Congress for funding to address the issue of thinning in fire prone areas..... 7-57
To save taxpayers' money, the Forest Service should harvest timber, not conduct prescribed burnings. 7-57
The proposed rule would increase susceptibility to catastrophic fires, which would harm the tourism industry. 7-57
The Forest Service should not claim that a reduction in harvest resulting from the prohibitions would not likely affect timber prices. 7-57
The Forest Service should analyze the allowable sale quantity potentially generated from each roadless area. 7-57
The Forest Service should address "below cost" timber sales. 7-58
National forest timber should be sold "when the price is right" and not offered on a set schedule..... 7-59
The Forest Service should sever the link between agency funding and timber harvest. 7-59
The government should not be in competition with private individuals. 7-60
The Forest Service should consider that timber harvest plays a very small role in the economy. 7-60
The Forest Service should establish funding for seeding trees and restoration work..... 7-60
The Forest Service should examine the cost/benefits of revegetating, stabilizing, and maintaining logged areas. 7-60
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. 7-60
The government must accept the responsibility for stopping extractive practices and find the money to pay for the damage already done to the environment..... 7-61

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. 7-61
The Forest Service should be held monetarily accountable for their financial reporting accuracy 7-61
The Forest Service should eliminate subsidies for extractive industries. 7-61
The beneficiaries of timber harvests should shoulder the major cost of road construction, maintenance, and reconstruction 7-62
Timber companies receiving subsidies should go through the official process of governmental review and oversight 7-62
The Forest Service should recognize that forest roads are not a subsidy to the timber companies. 7-62
The Forest Service should address costs for recreational use of National Forest System lands. 7-63
The Forest Service should encourage and subsidize the use of recycled rather than virgin fibers for paper production. 7-63
The Forest Service should analyze and disclose the amount and source of money used for the Roadless Area Conservation Proposed Rule. 7-63
To acquire property and rights-of-way 7-64
To offset the costs incurred due to lack of management access for wildfire and forest health 7-64
The Forest Service has been budgeted too much money. 7-64
The Forest Service should not spend taxpayers' money on the proposed rule. It should be spent at a local level. 7-64
The Forest Service should consider tax-based funding in order to pass this proposed rule. 7-65
The Forest Service should explain where the money will come from to fund law enforcement and manage projects created by the roadless policy. 7-65
Forest Service funding should be increased so that the agency can effectively manage and enforce existing laws. 7-65
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. 7-65
The Forest Service should explain whether the interim moratorium on no road building or maintenance saved money. 7-66
The environmental analysis should include, at a minimum, a detailed accounting of the purported $8.4 billion road maintenance "backlog." 7-66
The 8.4 billion dollar backlog figure is exaggerated and often used out of context. 7-66
The Forest Service has the funding to maintain its 380,000 mile network of roads; it just need to set its priorities straight. 7-66
The Forest Service should address the Watershed Improvement Needs Inventory backlog. 7-67
The Forest Service should assure funding for continued road maintenance. 7-67
Spend taxpayer funds on road maintenance and obliteration 7-67
Ask county, state or federal highway programs to maintain or accept roads 7-68
Lack of funding for road maintenance should not be used as an excuse to prohibit road construction or close roads 7-68

Where maintenance costs are prohibitive, the Forest Service should consider posting some roads as unmaintained, with travel at one's own risk. 7-68
The Forest Service should acknowledge that in the past road maintenance was provided by timber sale purchasers. 7-68
The Forest Service should correct its estimate of the savings from reduced road maintenance to reflect recent expenditures on roads. 7-69
The Forest Service should address the relation between its lack of funding for road maintenance and continued funding for international forestry programs. 7-69
The Forest Service should disclose the funds spent on road obliteration. 7-69
Closing roads or restricting motorized access would negatively impact the economy. 7-69
The Forest Service should maintain trails to avoid hurting the economy. 7-70
If the Forest Service lacks funding, they should allow roads to decommission naturally, or by gating or placing ditches across them. 7-70
The Forest Service should consider the negative impacts of roadless area designations on usable Forest Service roads and the Purchaser Road Credit Program. 7-70
The Forest Service should not spend funds building roads into all roadless areas just to make it easier to fight wildfires. 7-70
The Forest Service should explain who finances the design and planning of logging roads. 7-70
Any funds saved by ceasing maintenance of roads should be used for other management activities. 7-70
For alleviating the environmental impacts of roads 7-71
For facilities upkeep 7-71
For upgrading existing four-wheel drive roads and expanding facilities for the handicapped 7-71
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. 7-71
Chief Dombeck should ask for funds to adequately support the Forest Service's recreation and trails programs. 7-71
There should be increased funding for support of recreational goals and uses of roadless areas. 7-71
The Forest Service should consider the benefits from fees and volunteer services contributed by users to maintain roads and trails. 7-72
Funding from the off-highway vehicle community may be terminated due to agency misuse of those funds. 7-72
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. 7-72
The Forest Service should not make the public purchase permits or charge user fees to use public lands. 7-73
Discontinue the trail park fee demonstration program 7-73
Discontinue the Adventure Pass program 7-73
The Forest Service should incorporate a fee or permit system for using certain areas of public lands. 7-73
Charge fees based on the amount of damage a particular activity causes 7-74
Impose a $15.25 fee on bicycles and cross-country skis 7-74
Expand the trailhead permit system 7-74

The Forest Service should address the "willingness to pay" principle. 7-74

Chapter 8 Cumulative Effects Analysis 8-1

The Forest Service should elucidate the relationship between the proposed rule and concurrent rulemaking initiatives. 8-3
- Relationship to the Road Management Rule 8-3
- Relationship to forest planning Regulation revisions 8-3
- Relationship to the Interior Columbia Basin Ecosystem Management Project 8-5
- Relationship to local Habitat Conservation Plans 8-5
- Relationship to multiple other initiatives 8-5
- Specific forest plans 8-6

The Forest Service should complete the concurrent national rulemakings in a logical sequence. 8-6
- By adopting the Planning Rules first 8-7
- Public Concern: By waiting until terms and definitions in the Transportation Policy are adopted 8-7

The Forest Service should integrate the proposed Roadless Area Conservation Rule with other concurrent rulemaking initiatives. 8-8
- With the Transportation Policy 8-8
- With the Planning Rules 8-8
- With multiple other rules 8-8

The Forest Service should evaluate the current forest plan direction for each roadless area. 8-9

The Forest Service should analyze the cumulative effect of the proposed rule with concurrent proposed rulemaking initiatives and current environmental legislation. 8-10
- With the road management rule 8-10
- With the Unified Federal Policy for Ensuring a Watershed Approach to Federal Land and Resource Management 8-10
- With both concurrent national rulemakings 8-10
- With multiple other initiatives 8-11
- With existing environmental legislation 8-11
- With past withdrawals of National Forest System lands for environmental protection 8-11

The Forest Service should address the site specific cumulative effects of concurrent rulemaking initiatives on individual national forests. 8-12

The Forest Service should prepare a meaningful cumulative effects analysis for the Final EIS. 8-12
- Distinguish direct and indirect effects from cumulative effects 8-13
- Comparison of the alternatives 8-13

The Forest Service should avoid incorporating cumulative effects into baseline data. 8-13

Chapter 9 Technical and Editorial Concerns..... 9-1

The Forest Service should make its Environmental Impact Statements shorter and less complicated. 9-1
The Forest Service should eliminate repetition in the Draft EIS. 9-1
The Forest Service should use clear and honest language. 9-1
The proposed rule is vague and short on reasoning. 9-2
The Forest Service should clearly distinguish the difference between conservation and preservation. 9-2
The Forest Service should clarify the use of the phrase, “the roaded portion of the inventoried roadless area.” 9-2
The Forest Service should clarify the statement in the booklet of questions and answers that this proposal would “prohibit construction and reconstruction in most inventoried roadless areas.” 9-3
The Forest Service should clarify the phrasing of the proposed rule’s alternatives. 9-3
The Forest Service should remove the word “whether” from all the alternatives in the Draft EIS. 9-3
The Forest Service should evaluate the use of the word “natural” in describing roadless areas. 9-3
The Forest Service should address contradictions in the cumulative effects analysis. 9-4
The Forest Service should address contradictions in the Draft EIS regarding the evaluation of roadless characteristics and values. 9-4
The Forest Service should reconcile the differences between the issues identified in the abstract and those cited throughout the rest of the Draft EIS. 9-5
The Forest Service should clarify the difference between responses and comments. 9-5
The Forest Service should reconcile contradictory statements in the proposed rule regarding the right to build mining exploration roads. 9-5
The Forest Service should reword the Civil Justice Reform Act section of the Draft EIS. 9-5
The Forest Service should address inconsistent estimates of road construction in the Draft EIS. 9-5
Five year estimates for road construction and reconstruction in inventoried roadless areas 9-5
The Forest Service should clarify the discrepancy between the Interior Columbia Basin Ecosystem Management Project’s estimate of impaired streams and that contained in the Draft EIS. 9-6
The effects analysis in the Draft EIS should specify what types of uses will be prohibited in uninventoried roadless areas and other unroaded areas. 9-6
The Forest Service should specify the referent of the word “treaty” in the Draft EIS. 9-6
The Forest Service should identify the controversial issues mentioned in the Draft EIS. 9-7
The Forest Service should specifically identify the “threats to wilderness character” mentioned on page 3-138 of the Draft EIS. 9-7
The Forest Service should identify A-7 special designations. 9-7
The Forest Service should delete undefined phrases on page S-14 of the Draft EIS. 9-7
The Interdisciplinary Team should consider addressing the effects of the proposed rule on subcategories of the Recreation Opportunity Spectrum 9-7

The terms “classified” and “unclassified” roads should be changed to “maintained” and “unmaintained.” 9-8
The Forest Service should replace the phrase “ensure consideration” with “ensure compliance with the rule” in item 2 of the proposed rule. 9-8
The Forest Service should replace the wording of “most restrictive” with “most protective” when describing Alternative 4. 9-8
The Forest Service should change the statement “the proposed action would prohibit road construction and reconstruction in inventoried roadless areas” to “prohibit road construction and reconstruction in unroaded portions of inventoried roadless areas” in the Draft EIS. 9-8
The Forest Service should change the statement “no roads or trails would be closed because of the prohibitions” to “no classified roads would be closed because of these prohibitions” on page S-1 of the Draft EIS. 9-8
The Forest Service should change the phrase “of considerable length” to “of meaningful length” in Section 294.13(B)(2) of the proposed rule. 9-8
The Forest Service should combine the discussions of timber harvest on pages 3-112 and 3-182. 9-9
The Forest Service should use the terms “scheduled” and “unscheduled” harvest when discussing the alternatives. 9-9
The Forest Service should modify the language of 36 CFR. 9-9
294.12 9-9
294.13 9-9
The Forest Service should address the grammar and clarity of paragraph 294.13(a) in the Draft EIS. 9-10
The Forest Service should use a hierarchical numbering system for the pages of Chapter 3. 9-10
The Final EIS should replace the term “dispersed recreation” with the more appropriate term “recreation setting.” 9-10
The Forest Service should clarify page S-36 of the Draft EIS. 9-10
The Forest Service should change “eliminating” to “eliminate” in the last paragraph of page 3-31. 9-11
The Forest Service should clarify the heading of table 3-9 on page 3-51. 9-11
The Forest Service should reword “The largest would increase occurs in…” in the third paragraph of page 3-53. 9-11
The Forest Service should reword “precise estimates” on page 3-57 of the Draft EIS. 9-11
The Forest Service should use more than one example of beneficial stewardship activities on page 3-66 of the Draft EIS. 9-11
The Forest Service should address typographical errors in paragraph two of page 3-137. 9-11
The forest service should reword the first sentence of paragraph five on page 3-141. 9-11
The Forest Service should reword or insert modifiers to the last sentence of the last paragraph on page 3-217. 9-12
The Forest Service should add “harvest” to the end of “…which do not prohibit roading and timber” on page 3-325. 9-12
The Forest Service should correct the spelling of “old growth dependant” on page 3-236. 9-12
The Forest service should replace “certainty” with “certainly” on page 3-237. 9-12
The Forest Service should correct Table 3-19 with regard to fire statistics. 9-12

The Forest Service should add "recreation stock use" to the list of dispersed recreation activities. 9-12
The Forest Service should withdraw Appendix A from the Draft EIS. 9-12
The Forest Service should reevaluate and clarify its definition of a road. 9-14
The definition is misleading 9-15
Clarify the 50-inch rule 9-15
The Forest Service should clarify the term "existing road." 9-15
The Forest Service has changed the definition of the term "road" from the one contained in the Wilderness Act. 9-15
The Forest Service should reassess the use of the term "Forest Service Roads." 9-16
The Forest Service should recognize that any travelway used by horses, bikes, vehicles, or pedestrians is a "road." 9-16
The Forest Service should define "trail." 9-16
The Forest Service should clarify the distinction between "roads" and "trails." 9-16
The definition of a road should be changed from 50-inches wide to 72-inches wide so that popular trails will not be decommissioned. 9-16
The Forest Service should clarify various road levels and trail designations. 9-16
The Forest Service should consider snowmobile trails as winter "roads." 9-17
The Forest Service should clarify the definition of "other vehicle travelways." 9-17
The Forest Service should clarify the definition of the classification "roadless." 9-17
The definition is misleading 9-17
Inventoried roadless areas, unroaded areas, and classified roads 9-17
The Forest Service should not use the term "roadless" for areas with existing roads. 9-18
The Forest Service should address conflicts between the proposed definition of roadless and the guidelines used for previous inventories. 9-18
The Forest Service definition of roads and roadless should comply with state and county definitions 9-18
The Forest Service should set clear boundary definitions for inventoried roadless areas. 9-18
The Forest Service should define "irreversible loss of roadless character." 9-18
The Forest Service should modify its definition of inventoried roadless areas in Section 294.11 of the proposed rule. 9-19
The Forest Service should define the terms "unroaded" and "other unroaded areas." 9-19
The definition will increase litigation costs 9-20
The Forest Service should clarify the definition of the term "classified road." 9-20
The Forest Service should determine whether the redefinition of many existing recreational roads and trails as "unclassified" would result in the closure of campgrounds and other recreational facilities. 9-20
The Forest Service should reevaluate its definition of "reconstruction." 9-20
The Forest Service should clarify the distinction between "construction" and "reconstruction." 9-21
The Forest Service should clearly define "new" road construction. 9-21
The Forest Service should clarify the difference between rebuilding a road and road reconstruction. 9-21
The Forest Service should clarify the definitions of "reconstruction" and "maintenance." 9-21
The Forest Service should clarify the definition of the term "maintenance." 9-21

The term “decommission” should be defined in the document. 9-21
The Forest Service should define the term “valid” regarding access to public or private land within roadless areas. 9-22
The Forest Service should clarify the definition of “valid existing rights.” 9-23
The Forest Service should modify its definition of “existing lease” in the Final EIS. 9-23
The Forest Service should define what “essential management” means in terms of exceptions to the roadless areas. 9-23
The Forest Service should define the term “stewardship.” 9-23
The Forest Service should define the term “impairment” as it is used to describe watersheds. 9-23
The Forest Service should define the term “huge.” 9-23
The Forest Service should define threatened, endangered, proposed and sensitive species. 9-24
The Forest Service should include recreational and timber harvest access in the definition of “vital access.” 9-24
The Forest Service should define the word “protect.” 9-24
The Forest Service should include people who use paper or live in wooden houses in the definition of “stakeholders” on page S-39 of the Draft EIS. 9-24
The Draft EIS should include all definitions of small entities contained in the Regulatory Flexibility Act. 9-25
The Forest Service should clarify the definition of user vehicles. 9-25
Standard passenger vehicle 9-25
Off-road/off-highway vehicle 9-25
The Forest Service should define the term “non-attainment” in the Draft EIS. 9-26
The Forest Service should define the terms “even-aged,” “shelterwood,” and “seed tree.” 9-26
The Forest Service should include “recreation” in the glossary of the Draft EIS. 9-26
The Forest Service should clearly define “potentially isolated” areas. 9-26
The Forest Service should define all acronyms used in the Draft EIS. 9-26
The Forest Service should remove the term “wildland” from the Draft EIS. 9-27
The Forest Service should clarify what constitutes “imminent”. 9-27
The Forest Service should make its maps clear and accurate. 9-28
Correct inaccuracies of maps on the web. 9-29
The maps included with the Draft EIS should provide sufficient detail. 9-29
Update maps to include uninventoried unroaded areas and wilderness areas 9-29
Increase scale 9-30
The Forest Service should create accurate, up-to-date maps and acreage calculations of the unroaded portions of inventoried roadless areas. 9-30
The Forest Service should map the location and size of every roadless and unroaded area before making any rules. 9-30
The Forest Service should reconcile the large discrepancy in the number of acres of inventoried roadless areas on the Intermountain Region web site with that on national forest maps. 9-31
The Forest Service should provide accurate maps of the Inyo National Forest in Volume 2 of the Draft EIS. 9-31
The Forest Service should clarify the table of contents for Volume 2 of the Draft EIS. 9-31

The Forest Service should clarify whether the farthest-north portion of the Badger-Two Medicine area of the Lewis and Clark National Forest is considered an "inventoried roadless area" on the roadless Draft EIS map. 9-31
The Forest Service should improve the shading of Figure 3-17 on page 3-50 of the Draft EIS. 9-31
The Forest Service should correct the graphics in the Draft EIS. 9-31
The Forest Service should provide a better representation of mining permissive tracts in the Draft EIS maps. 9-31
The tables in the Draft EIS should be scientifically based. 9-32
The Forest Service should address inaccuracies in tables of the Draft EIS 9-32
The Forest Service should clarify the data presented in Table 3-20 of the Draft EIS. 9-32
The Forest Service should clarify discrepancies between Table 2-2 and page 3-76 of the Draft EIS 9-32
The Forest Service should address the data presented in Appendix B. 9-33

Appendix D Content Analysis Process

Public input on the Roadless Area Conservation Proposed Rule and Draft EIS has been analyzed using a process called content analysis. Analysts use a systematic method of compiling and categorizing public response; this process allows them to identify the full range of public concerns regarding the proposed rule. Information from formal public meetings, letters, emails, faxes and other sources are all included in this analysis. Content analysis is intended to help the interdisciplinary team identify issues which may lead to clarification of, revision of, or inclusion of technical information pursuant to developing a final rule.

Each response (i.e., each unique submission such as letter, fax, email, etc.) is assigned a unique identifying number. This number allows analysts to link specific comments to original responses. Once a response has been assigned a number it is read by an analyst. The analyst codes the comments within the response according to the topic being addressed. Since a respondent may address several different topics in the same response, an analyst may assign different codes to different comments within the same response. These comments are then entered verbatim into a database under the code assigned to them. Database reports are then generated in which comments are sorted by topic; this allows analysts to review all comments together which address a given topic. Use of this database allows analysts to identify a wide range of public concerns and to analyze the relationships between them. Finally, analysts prepare a written summary and analysis of public comment which includes a narrative description of public comment by topic, a list of public concerns identified by analysts, and supporting sample quotes from the public.

This process and the resulting summary are not intended to replace responses in their original form. Rather, they provide a map to the letters and other input on file at the office of the Content Analysis Enterprise Team (CAET) in Salt Lake City. Interested parties are encouraged to read public comment firsthand.

It is important for the public and interdisciplinary team members to understand that this process makes no attempt to treat input as if it were a vote. Rather, the content analysis process serves to capture and organize the range of substantive comment, whether expressed by one or many respondents. Finally, all interested parties, not just registered voters, are welcome to comment pursuant to NEPA. Interested parties therefore include businesses, corporations, and special interest groups, as well as individuals regardless of age, nationality, or voter registration, eligibility, or status. Content analysis does ensure that every response is considered at some point in the decision process.

Appendix E Coding Structure

HEADER INFORMATION

Organization type, number of signatures, and response type are listed on all letters, written at the top of the letter's first page. Additional fields present when necessary.

FIRST FIELD – Organization Type

Governmental
F – Federal or International Agency
E – Federal Elected Officials or Staff
S – State Agency
V – State Elected Officials or Staff
C – County Agency
K – County Elected Officials
D – Town or Municipality/Municipal Associations
H - Town or Municipality Elected Official
T – Tribal

Organizational
A – University/Professional Society
B – Business/Business Association
G – Range/Grazing Organization
L – Timber Company or Association
M – Mining/Oil Company or Organization
O – Local Community/Civic Organization/Church
P – Environmental/Preservation Organization or Association
R – Recreational Organization
U – Utility Group or Organization (water, electrical, gas)
Z – Wise Use or Land Rights Organization

Unaffiliated or Unknown
I – Unaffiliated Individual(s) or unknown

SECOND FIELD – Number of signatures

THIRD FIELD – Response Type

1. Letter
2. Fax
3. E-Mail
4. Petitions are usually identified as such in the opening text. They have a common body of text with multiple signatories. They may or may not include addresses.
5. Public Meeting Comment Form
6. Public Meeting Transcripts
7. Resolutions are similar to petitions but normally include addresses. Often resolutions have wording similar to: "We the undersigned resolve to" included in the text of the letter. They are often prepared by local government commissions.
8. Action Alert

ADDITIONAL FIELDS

Immediate Attention Required

Any given response could contain a combination of the following fields. Identify all that apply to the response under analysis.

1. Notice of appeal/litigation/threat.
2. Freedom Of Information Act (FOIA) request.
3. Unassigned
4. Requires detail review/well written, (May include enclosure with letter, scientific/technical documents or noteworthy enclosures such as maps, GIS, etc.)
5. All Government or elected officials and representatives. All letters from Tribal Nations, federal, state, and local government agencies.
6. Requests for extension of comment period.
   6A) Extend comment period 15 days
   6B) Extend comment period 30 days
   6C) Extend comment period 60 days
   6D) Extend comment period 90 days
   6E) Extend comment period 120 days
   6F) Extend comment period - other
7. Requests for Information.
   7A) Summary DEIS
   7B) Hardcopy DEIS
   7C) CD – DEIS
   7D) Summary FEIS
   7E) Hardcopy FEIS
   7F) CD – FEIS
   7G) Add to mailing list
   7H) Remove from mailing list
   7I) Copy of Fed. Reg. Notice
   7J) Multiple or Other

Common Interest Classification

O. No preference stated.
Category O responses are requests for information or are requests to extend the comment period that contain no indication of position or preference.

I. Respondent favors a more restrictive combination of alternatives/policy options. This category includes all responses that claim the chosen alternatives do not offer strong enough protection to roadless areas. These responses may include suggestions for protective policies not discussed as alternatives in the Draft EIS.

II. Respondent favors a less restrictive combination of alternatives/policy options. This category includes most responses that convey a degree of support for the direction of the policy, but do not want it to limit specific uses.

III. Respondent favors the no action combination of alternatives. (1-A-1)

IV. Respondent favors the preferred combination of alternatives. (2-B-3)

ALTERNATIVE FIELDS

These codes are used to identify comments specific to each national forest and grassland.

0102 Beaverhead/Deerlodge
0103 Bitterroot
0104 Idaho Panhandle
0105 Clearwater
0108 Custer
0110 Flathead
0111 Gallatin
0112 Helena
0114 Kootenai
0115 Lewis and Clark
0116 Lolo
0117 Nez Perce

0202 Bighorn
0203 Black Hills
0204 Grand Mesa, Uncompahgre, and Gunnison
0205 Thunder Basin National Grasslands
0206 Medicine Bow-Routt
0207 Nebraska
0209 San Juan-Rio Grande
0210 Arapaho and Roosevelt
0212 Pike and San Isabel
0214 Shoshone
0215 White River

0301 Apache-Sitgreaves
0302 Carson
0303 Cibola
0304 Coconino
0305 Coronado
0306 Gila
0307 Kaibab
0308 Lincoln
0309 Prescott
0310 Santa Fe
0312 Tonto

0401 Ashley
0402 Boise
0403 Bridger-Teton
0405 Caribou
0407 Dixie
0408 Fishlake
0409 Humboldt / Toiyabe
0410 Manti-La Sal
0412 Payette

0413 Salmon- Challis
0414 Sawtooth
0415 Targhee
0418 Uinta
0419 Wasatch-Cache

0501 Angeles
0502 Cleveland
0503 Eldorado
0504 Inyo
0505 Klamath
0506 Lassen
0507 Los Padres
0508 Mendocino
0509 Modoc
0510 Six Rivers
0511 Plumas
0512 San Bernadino
0513 Sequoia
0514 Shasta-Trinity
0515 Sierra
0516 Stanislaus
0517 Tahoe

0601 Deschutes
0602 Fremont
0603 Gifford Pinchot
0604 Malheur
0605 Mt. Baker-Snoqualmie
0606 Mt. Hood
0607 Ochoco
0608 Okanogan
0609 Olympic
0610 Rogue River
0611 Siskiyou
0612 Siuslaw
0614 Umatilla
0615 Umpqua
0616 Wallowa-Whitman
0617 Wenatchee
0618 Willamette
0620 Winema
0621 Colville
0801 National Forests in Alabama
0802 Daniel Boone
0803 Chattahoochee and Oconee
0804 Cherokee
0805 National Forests in Florida
0806 Kisatchie
0807 National Forests in Mississippi
0808 George Washington and Jefferson National Forest

0809 Ouachita
0810 Ozark-St. Francis
0811 National Forests in North Carolina
0812 Francis Marion and Sumter National Forests
0813 National Forests in Texas
0816 Caribbean

801A William B. Bankhead
801B Conecuh
801C Talladega
801D Tuskegee
805A Apalachicola
805B Ocala
805C Osceola
807A Bienville
807B Delta
807C Desoto
807D Holly Springs
807E Homochitto
807F Tombigbee

811A Croatan
811B Nantahala
811C Pisgah
811D Uwharrie
813A Caddo-Lyndon B. Johnson National Grasslands
813B Angelina
813C Davey Crockett
813D Sabine
813E Sam Houston

0902 Chequamegon
0903 Chippewa
0904 Huron-Manistee
0905 Mark Twain
0906 Nicolet
0907 Ottawa
0908 Shawnee
0909 Superior
0910 Hiawatha
0912 Hoosier
0914 Wayne
0919 Allegheny
0920 Green Mountain and Finger Lakes
0921 Monongahela
0922 White Mountain

1001 Tongass (only)
1002 Tongass-Stikine Area
1003 Tongass-Chatham Area
1004 Chugach

1005 Tongass-Ketchikan Area
1006 Tongass and Chugach

9999 Multiple Forests or no Forest (default)

Region Code:

1. Region 1
2. Region 2
3. Region 3
4. Region 4
5. Region 5
6. Region 6
7. No Region or Multiple
8. Region 8
9. Region 9
0. Region 10

Purpose And Need For Action

PURPN

10000 Purpose and Need 1-10
- 10100 General comments on why there should be a rule
  - 10110 There should be a rule, but with more prohibitions
- 10200 General comments on why there should not be a rule
  - 10210 Concern the policy may/will restrict access
    - 10211 Forest Management Access
    - 10212 Recreational Access
    - 10213 Access for elderly, very young, and/or handicapped
  - 10220 Existing processes, policies are adequate
- 10300 Background & History of Roadless Areas 1-4

Guiding Policy of National Forests and Grasslands

GUIDP

20000 Purpose of public lands general
- 21000 General comments about Multiple Use as the Guiding Policy
  - 21200 Roadless areas evaluated under Multiple Use context
  - 21300 Multiple Use and Commodity Values
  - 21400 Multiple Use and Recreational Values
  - 21500 Multiple Use and Environmental Values
  - 21600 Conflicts among various uses
- 22000 General comments Ecosystem Management as the Guiding Policy
  - 22100 Ecosystem management and human society
  - 22200 Ecosystem management and commodity values
  - 22300 Ecosystem management and recreational uses
- 23000 General comments about other Guiding Policies
- 24000 Chief's Natural Resource Agenda

Technical and Editorial

TECED

30000 Overall Construction & Language in Government Documents
- 31000 Language in Draft EIS General
  - 31100 Language clarity
  - 31200 Technical/editorial errors
  - 31300 Consistency of meanings
- 32000 Definitions
  - 32100 Definition of Road
  - 32200 Definition of Trail
- 33000 Technical and Editorial Concerns by Chapter/Section
  - 33100 Chapter 1 – Purpose and Need

33200 Chapter 2 – Alternatives, Including Proposed Action
33300 Chapter 3 – Affected Environment and Environmental Consequences
33400 Chapter 4 – Consultation and Coordination
33500 Clarity/Accuracy of Appendices
33510 Appendix A
33520 Appendix B
33530 Appendix C
33540 Appendix D
33550 Appendix E
33560 Prescriptions Referenced in Alternative T4 (E-1)
33600 Volume II –maps
33700 Executive Summary
34000 Construction and Accuracy of Related Documents
34100 Web site
34200 Federal Register Notice
34300 Notice of Intent
34400 Other

Consultation, Coordination and Public Involvement

CONCO

40000 Coordination and Cooperation with other government entities
40100 Federal Agencies
40110 Bureau of Land Management
40120 National Park Service
40130 Fish and Wildlife Management
40200 State, Local, other agencies
40300 Tribes

41000 Decision making process and authority
41100 Role of the President/Executive Branch
41200 Role of the Forest Service
41210 Chief
41220 ID team
41230 CAET
41240 Local Forest Services offices and personnel
41300 Role of Congress
41400 Role of other Government Agencies
41500 Role/Influence Of Citizens
41510 Role/Influence Of Local Citizens
41600 Role/Influence Of Local Community
41700 Role/Influence Of Interest Groups
41710 Environmentalists/Environmental Groups
41720 Industry/Business Groups
41730 Multiple Use/Wise Use Groups

42000 Issues of Trust and Integrity, Biases
42100 Biases in language/wording
43000 Hidden/underlying agendas, unstated objectives, conspiracies

44000 Public Involvement general 4-1
44010 Education about process
44020 Volunteerism
44100 Adequacy of Public Meetings
44110 Locations
44120 Dates and times
44130 Notification
44140 Informational meetings
44150 Public hearings
44160 Other
44200 Adequacy/Accessibility of Resources
(for accuracy comments, see TECED 33000 & 34000)
44210 Web-based resources
44220 Mail, E-mail, fax
44230 Federal Register
44240 General request for information, copies, maps
44250 Maps, GIS, Meta-data
44300 Local Involvement in Forest Management Planning 3-208
44400 Public Involvement, Cooperation and Collaboration on DEIS
44410 Scoping and Analysis of Scoping
44420 One-year for analysis, construction, and publication of DEIS)
44430 Adequacy of comment period for Draft EIS (Extension requests)
44440 Adequacy of notification
44450 Preparers and Contributors 4-4
44460 Accessibility of copies of Draft EIS
44461 Request copy of DEIS
44462 Request copies of FEIS
44470 Distribution of the Draft Environmental Impact Statement 4-9

Legal Issues and Concerns

LEGAL

50000 General legal issues of Roadless Area Conservation Draft EIS
51000 Effects of specific laws/acts on multiple resources
52000 Constitution (U.S.)
52100 5TH Amendment – Private Property Rights
52200 10TH Amendment – States' Rights/Federalism
53000 Federal Land Management – Land Use Acts/Laws
53100 MUSYA (Multiple Use and Sustained Yield Act)
53200 Organic Act
53300 FLPMA (Federal Land Planning and Management Act)

53400 1964 Wilderness Act
53500 Revised Statute 2477
53600 1872 Mining law
53700 Federal Roads and Trails Act
53800 NFMA (National Forest Management Act)
53900 Alaska Land Management Acts (ANILCA, TLMP, TTRA, etc.)
54000 Federal Environmental Acts/Laws
54100 NEPA (National Environmental Policy Act)
54200 CAA (Clean Air Act)
54300 CWA (Clean Water Act)
54400 ESA (Endangered Species Act)
54500 Environmental Justice Executive Order (3-201)
55000 Other Federal Acts/Laws
55100 ADA (Americans with Disabilities Act) (use only if ADA cited)
55200 APA (Administrative Procedures Act)
55300 Paperwork Reduction Act
55400 Regulatory Flexibility Act
55500 Unfunded Mandates Reform Act
56000 Treaties/Tribal laws
57000 State Constitutions and Laws (incl. Water rights)
57100 State Wilderness Acts

The Alternatives – Including the Proposed Action

ALTER

60000 Range of Alternatives
61000 Combinations of Alternatives
61100 No Action Combination - 1, A, T1
61200 Preferred Combination - 2, B, T3
61300 Other Combinations
61310 Alternative 4, D Modified
62000 Combined Effects of Alternatives 3-239
63000 Issues that should have been addressed in Draft EIS and/or should be addressed in Final EIS
64000 Comparison of alternatives 2-21
64100 Prohibitionary Alternatives (2-3)
64110 Alternative 1
64120 Alternative 2 – Preferred
64130 Alternative 3
64140 Alternative 4
64150 Other Prohibitions in Inventoried Roadless
64200 Procedural Alternatives (2-6)
64210 Alternative A
64220 Alternative B - Preferred
64230 Alternative C

64240 Alternative D
64250 Other Procedural Processes
64251 Processes Other Than Rulemaking (2-16)
64252 Other Time Frames for Applying Prohibitions (2-19)
64300 Exemption Alternatives (2-10)
64310 Tongass Alternative T1
64320 Tongass Alternative T2
64330 Tongass Alternative T3 – Preferred
64340 Alternative T4
64350 Other Exemptions (2-20)
64351 Do/Do not exempt specific regions, forests, geographic areas
64352 Do/do not exempt current or proposed timber sales
64353 Do/do not exempt special use/permit areas
64354 Do/do not exempt land exchanges or other agreements
64355 Do/do not exempt scientific/research areas or facilities
64400 Other Alternatives Considered
64410 Alternative Land Use Designations (2-16)
64411 Request for more wilderness designations
64412 Request for less or no more wilderness designation
64420 Alternative Geographical Definitions (2-19)
64421 Adequacy of prior inventories, need for new inventory
64422 Include all areas with ecological values
64423 Include areas of smaller size (under 5,000 acres)
64424 Do/do not include areas that have existing roads

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71110 Effects on other FS lands
71120 Effects on other Public Lands
71130 Effects on Private Lands
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71210 Demographics 3-6
71220 Resource Use and Demand 3-9
71230 Agency Management Policies and Administrative Factors 3-11
71300 The Forest Service Road System 3-13
72000 Other Effects Analysis
72100 Cumulative Effects of the Proposed Roadless Rule with Other Forest Service Proposed Rules 3-240

72200 Interaction with other Ongoing and Related Planning Efforts 1-14
72210 National Forest System Land and Resource Management Planning Proposed Rule
72220 National Forest System Road Management Proposed Rule
72230 Regional, Forest, or area plans
72300 Short-Term Uses and Long-Term Productivity 3-242
72400 Unavoidable Adverse Effects 3-243
72500 Mitigation Options 3-243
72600 Irreversible and Irretrievable Commitments of Resources 3-245

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ENVIR

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81000 Environmental Conditions and Trends 3-12
82000 Adequacy of environmental analysis
83000 Ecological Factors, Overall Ecosystem Health 3-20
83100 Water and Watershed
83110 Watershed Health 3-22
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83210 Soil Loss and Sedimentation 3-32, 3-36
83220 Channel Morphology 3-40
83230 Karst, limestone, cave formations
83300 Air Quality 3-4
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83400 Biological Diversity 3-47
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83620 Noxious and invasive weeds
83630 Threatened, Endangered, Proposed and Sensitive
83640 Lichens, Fungi
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85100 Global Warming/Greenhouse effects
85200 Deforestation/desertification

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SOCEC

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90100 Land Use Patterns/Urban Sprawl
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91610 Motorized
91611 Street Legal (High-clearance, 4X4)
91612 Motorized Off-road (OHV, ATV, ORV)
91613 Winter motorized
91620 Mechanized
91630 Equestrian

91640 Foot
91650 Other Specific
91700 Allow/encourage recreational activities
91710 Motorized
91711 Street Legal (High-clearance, 4X4)
91712 Motorized Off-road (OHV, ATV, ORV)
91713 Winter motorized
91720 Mechanized
91730 Equestrian
91740 Foot
91750 Other specific
92000 Quality of Life
92100 Spiritual/Religious values
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92300 Future Generations
93000 Economic Conditions and Effects
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93300 Timber Harvest general (BMP) 3-112, 3-182
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93400 Non-Timber Forest Products 3-179
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93600 Agency Costs/funding 3-200
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93640 Revenues
93641 Tax-based funding
93642 Fee-based funding
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93644 Timber Revenues/Timber Subsidies
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- 93740 PILT and 25% payment

93800 Economic Effects on Other Nations/Global Economy

Appendix F Demographics

Introduction

Demographic analysis presents an overall picture of respondents: where they live, their general affiliation to various organizations or government agencies, and the manner in which they respond. A database containing public comment organized under subject categories (see Appendix D), as well as demographic information, can be used to isolate specific combinations of information about public comment. For example, a report can show public comment from certain geographic locations or sort comments by specific interest types. Thus demographic coding, combined with comment coding, allows managers to use the database to focus on specific areas of public concern linked to types of respondents, geographic area, and response formats.

The consideration of public comment is not a vote-counting process. Every comment and suggestion has value, whether expressed by one respondent or a thousand. Those who respond do not constitute a valid random or representative public sample. Respondents are self-selected and include children, businesses, people from other countries, and people who submit multiple responses. Therefore, caution should be used when interpreting the demographic numbers, tables, and figures in this report. While this information can provide insight into the perspectives and values of respondents, it does not necessarily reveal the desires of society as a whole. All input is considered and the analysis team attempts to capture all relevant public concerns in the analysis process.

Demographic Analysis

CAET identifies several categories for demographic purposes. Responses are the individual letters, postcards, emails, etc., received. Respondents are the individual response writers. Signatures refer to the people who signed these individual responses. The number of signatures may be greater than the number of responses as there may be more than one signature per response. Likewise, the number of total responses may be larger than the number of total respondents due to multiple submissions by the same respondents. CAET determines the number of responses received for a given project, the number of respondents, and the number of signatures.

CAET also tracks response format. The public uses a variety of response formats including letters, faxes, emails, petitions, public meeting transcripts, resolutions, action alerts, and form letters. Tracking response format allows better preparation for what future projects may bring in terms of number of responses, human resource needs, and future computer system needs. For example, the recent switch to electronic communication has brought with it the need for augmentation of computer systems, a trend that is well documented in the demographics from previous projects. Thus the inclusion of response format in demographic analysis allows managers to better serve the public by anticipating needed resources.

Table 1 shows the number or responses and signatures received for each response format. Form letters are responses received from 5 or more respondents containing identical comments. The majority of responses and signatures received were form letter responses. Following that were letters and faxes, email, public meeting comment cards, petitions, public meeting transcripts, resolutions, and action alerts, respectively. It should be noted that form letter responses come in all format types; however, for purposes of this analysis they are all grouped together as a single type; other format types identified refer to those format types excluding form letter responses.

Table F-1. Number of Responses and Signatures by Response Format

RESPONSE FORMAT	NUMBER OF RESPONSES	NUMBER OF SIGNATURES
Letter and Fax	16,731	20,202
Email	11,423	12,580
Public meeting comment cards	3,441	4,511
Petition	38	3,686
Public meeting transcripts	2,723	2,751
Resolutions	18	40
Action alerts	3	3
Sub Total	**34,377**	**43,773**
Form letters with additional comment	26,966	26,966
Form letter responses	1,094,965	1,105,277
Total- All Responses	**1,156,308**	**1,176,016**

The information in the above table is graphically represented in the following four figures.

Figure 1 illustrates the percentage of responses received by format type excluding form letter responses. The majority, nearly 49%, of non-form letter responses were received as letters or fax, followed by email at approximately 33%. Public meeting comment–be it through comment cards or spoken presentations–contributed nearly 18% of the total non-form letter responses.

Figure F-1. Percentage of Responses by Format Excluding Form Letter Responses

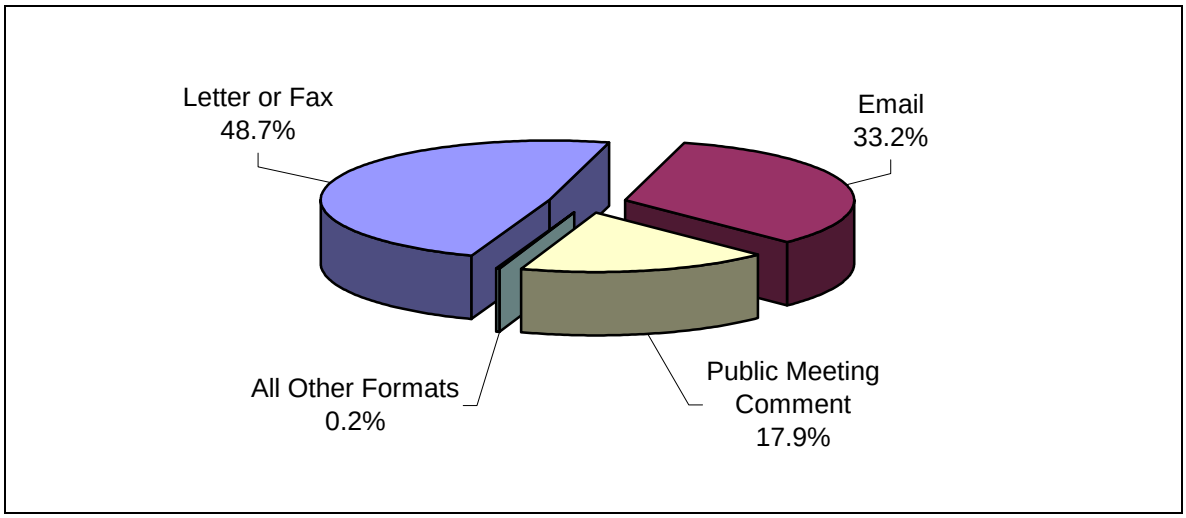

Figure 2 illustrates the percentage of signatures received by format excluding form letter signatures. Over 46% of the signatures were from individuals via letter or fax. Email accounted for nearly 29% of the signatures received. Public meeting comment–via comment cards or transcripts–accounted for nearly 17% of signatures, while some 8% of the signatures came from petitions.

Figure F-2. Percentage of Signatures by Format Excluding Form Letter Signatures

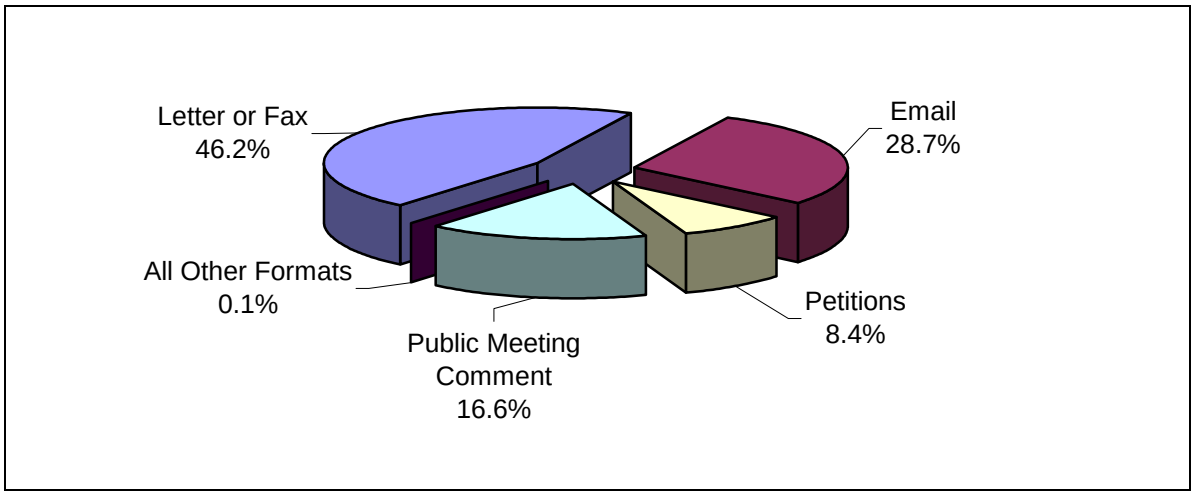

Figure 3 illustrates the percentage of form letter versus non-form letter responses. At 97%, the vast majority of responses received were form letter responses. Non-form letter responses contributed 3% of the total.

Figure F-3. Percentage of Form Letter versus Non-Form Letter Responses

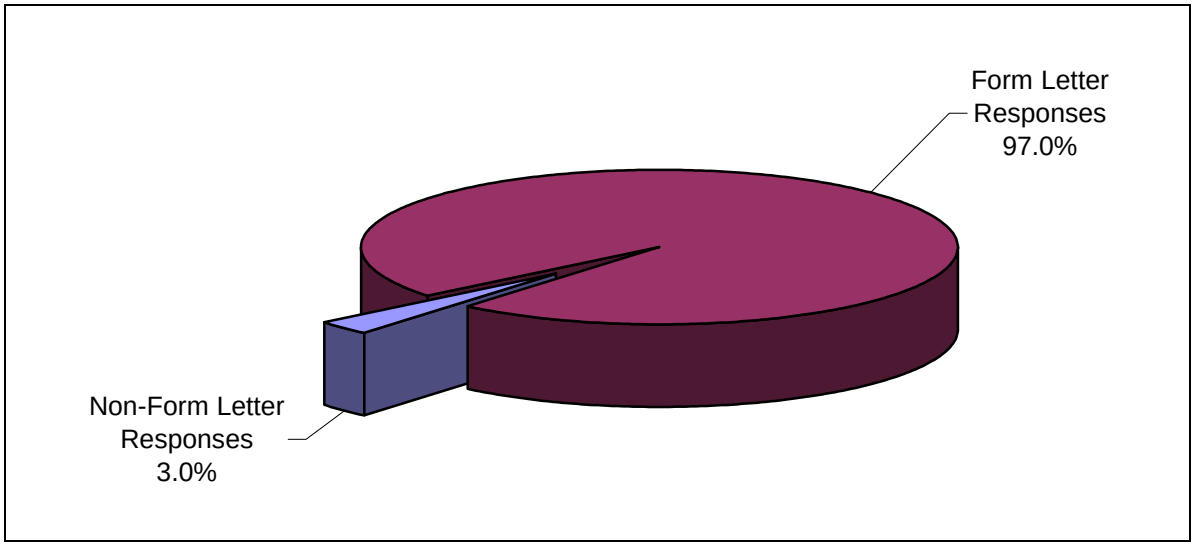

Figure 4 illustrates the percentage of signatures from form letter versus non-form letter responses. Over 96% of signatures from all responses were from form letter responses; non-form letter responses contributed nearly 4% of the total number of signatures.

Figure F-4. Percentage of Form Letter versus Non-Form Letter Signatures

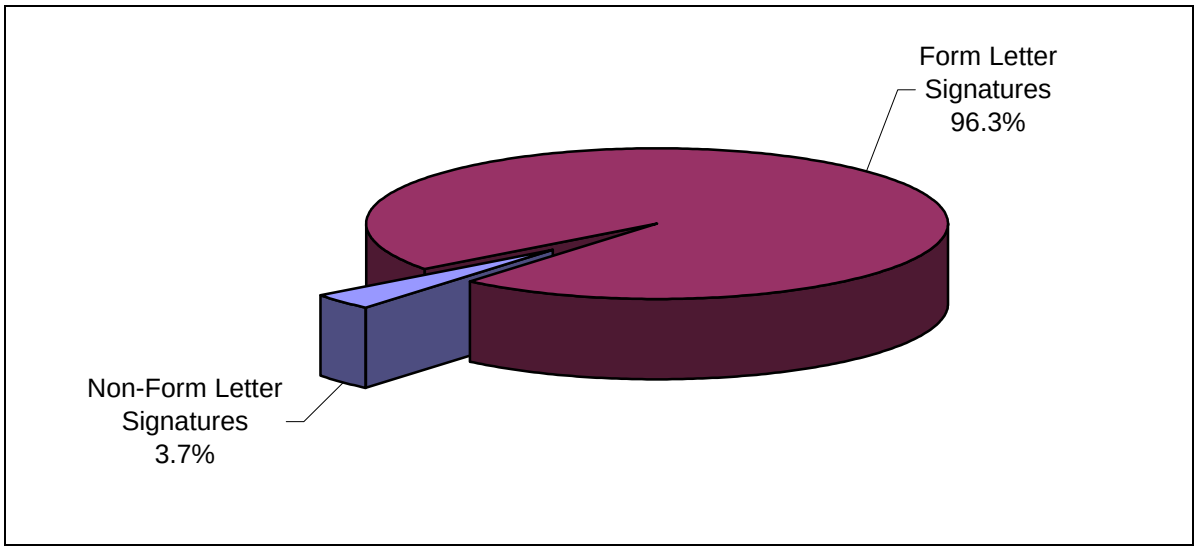

Table 2 tabulates all individual signatures–that is, signatures from both form letter and non-form letter responses–by origin and shows the ranking of each state with respect to the number of signatures submitted. Note that not all responses provided this specific geographic information. In addition, note the large number of responses of foreign origin; this is made possible largely by the availability of the electronic media.

Table F-2. Number of Signatures by Origin

STATE	SIGNATURES	RANK
Alabama	4,299	38
Alaska	7,147	31
Arizona	16,625	22
Arkansas	3,245	42
California	136,316	1
Colorado	27,437	15
Connecticut	18,397	21
Delaware	2,944	45
D.C.	33,063	12
Florida	85,195	2
Georgia	14,841	24
Hawaii	1,824	50
Idaho	8,381	29
Illinois	46,892	7
Indiana	9,701	26
Iowa	8,607	28
Kansas	3,679	41
Kentucky	3,989	40
Louisiana	4,614	36
Maine	5,351	34
Maryland	51,170	6
Massachusetts	52,354	5
Michigan	30,746	13
Minnesota	23,699	18
Mississippi	2,193	48
Missouri	14,082	25
Montana	15,887	23

STATE	SIGNATURES	RANK
Nebraska	2,431	47
Nevada	4,140	39
New Hampshire	7,957	30
New Jersey	36,468	11
New Mexico	18,480	20
New York	39,553	10
North Carolina	25,596	16
North Dakota	1,628	51
Ohio	24,385	17
Oklahoma	4,358	37
Oregon	62,377	3
Pennsylvania	43,113	9
Rhode Island	4,658	35
South Carolina	5,729	33
South Dakota	2,147	49
Tennessee	8,903	27
Texas	29,036	14
Utah	7,066	32
Vermont	3,184	43
Virginia	45,413	8
Washington	60,442	4
West Virginia	3,166	44
Wisconsin	19,649	19
Wyoming	2,661	46
International	13,769	
Anon/Unknown	70,029	
Total	**1,176,016**	

Table 3 displays the number of responses by organization type. The first box indicates respondents who wrote on behalf of themselves, or those whose affiliation was unclear.

Table F-3. Response by Organization Type

INTEREST GROUP	NUMBER OF RESPONSES
Individual/Unknown	1,154,309
Tribal	20
Federal Elected Official/s or Staff	60
Federal or International Agency	11
State Elected Official/s or Staff	89
State Agency	62
County Elected Official/s	158
County Agency	45
Town or Municipality	30
Town or Municipality Elected Official/s	50
Local Community or Civic Organization	68
Business or Business Association	268
Forest Product Company or Association	155
Environmental/Preservation Organization	526
Mining/Oil Company or Association	57
Range/Grazing Company or Association	27
University or Professional Society	69
Recreational Organization	230
Utility Group or Organization	19
Wise Use/Land Rights Organization	55

Finally, Table 4 shows the number of form letter responses by form number. As noted earlier, form letter responses refer to responses which are received from five or more respondents and which contain identical comment wording. One example of each form letter is entered into the database, and all responses with identical comment wording are assigned the same form number. If an otherwise identical response varies either through omission or addition of text that significantly changes or adds to its meaning, it is entered as an individual response. CAET identified a total of 249 distinct form letter types submitted for this project. Following is a listing of the number of responses submitted for each.

Table F-4. Number of Responses by Form Number

FORM #	NUMBER OF RESPONSES	FORM #	NUMBER OF RESPONSES	FORM #	NUMBER OF RESPONSES
1	394	28	334,931	55	722
2	73	29	59	56	6
3	1,600	30	32	57	71
4	12,537	31	41	58	857
5	35,740	32	8	59	278
6	5,070	33	1,601	60	49
7	139,390	34	7,908	61	26
8	430	35	838	62	17
9	12	36	9,041	63	18,010
10	9	37	129,921	64	7
11	266	38	53	65	20
12	52	39	1,797	66	548
13	611	40	46	67	218
14	29	41	143	68	73
15	932	42	1,295	69	358
16	94,846	43	5,346	70	5
17	9	44	458	71	15
18	525	45	124	72	5
19	6	46	24,846	73	5
20	33,667	47	86,240	74	5
21	42	48	5,660	75	92
22	7	49	5	76	8
23	22	50	457	77	25
24	26	51	31	78	22
25	53	52	17	79	16
26	12	53	11	80	4,123
27	65	54	43	81	27,112

FORM #	NUMBER OF RESPONSES	FORM #	NUMBER OF RESPONSES	FORM #	NUMBER OF RESPONSES
82	3,326	124	17	166	1,200
83	9	125	8	167	47
84	8	126	145	168	5,587
85	7	127	73	169	51
86	249	128	21	170	19
87	10	129	5,293	171	171
88	10	130	11,208	172	89
89	560	131	8	173	90
90	57	132	8	174	32
91	499	133	5	175	51
92	7	134	1,321	176	11
93	25	135	207	177	77
94	70	136	35	178	7
95	25	137	419	179	45
96	12	138	27	180	37
97	34	139	28	181	13
98	8	140	8	182	11
99	2,169	141	57	183	9
100	29	142	206	184	10
101	5	143	7	185	13
102	205	144	600	186	3,272
103	607	145	17	187	41
104	17	146	44	188	57
105	35	147	5	189	6
106	28	148	66	190	10
107	1,552	149	340	191	5
108	131	150	470	192	81
109	190	151	8	193	20
110	55	152	55	194	5
111	1,078	153	118	195	273
112	8	154	9,817	196	38
113	7	155	505	197	7
114	39	156	5	198	36
115	10	157	158	199	52
116	14,196	158	47	200	34
117	16	159	45	201	18
118	2,696	160	9	202	8
119	68	161	13	203	11
120	223	162	16	204	5
121	13	163	5,607	205	641
122	19	164	6	206	3,583
123	28	165	9	207	5

FORM #	NUMBER OF RESPONSES	FORM #	NUMBER OF RESPONSES	FORM #	NUMBER OF RESPONSES
208	14	250	69	292	17
209	3,471	251	31	293	25
210	20	252	36	294	22
211	5	253	3,591	295	25
212	9	254	111	296	30
213	78	255	164	297	40
214	6	256	21	298	29
215	29	257	84	299	334
216	10	258	41	300	17
217	6	259	72	301	18
218	14	260	10	302	10
219	30	261	7	303	9
220	9	262	29	304	25
221	7	263	93	305	52
222	13	264	5	306	5
223	21	265	5	307	9
224	39	266	8	308	9
225	25	267	14	309	23
226	35	268	5	310	76
227	29	269	24	311	14
228	37	270	10	312	48
229	5	271	36	313	376
230	28	272	11	314	66
231	5	273	384	315	780
232	36	274	6,513	316	13
233	18	275	16	317	245
234	12	276	9	318	1,941
235	7	277	5	319	42
236	46	278	17	320	63
237	66	279	13	321	14
238	29	280	6	322	1,301
239	30	281	169	323	9
240	5	282	16	324	6
241	121	283	6	325	29
242	23	284	58	326	6
243	22	285	10	327	995
244	18	286	48	328	6
245	555	287	9	329	17
246	26	288	64	330	6
247	68	289	25	331	10
248	18	290	24	332	5
249	19	291	16		