

## 2. ECONOMICS

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### National Economy

#### *1. The Roadless Rule will or could impact timber production and the nation’s economy.*

**Response:** *General.* A number of respondents raised concerns about the national economic impacts of the proposed rule. While some believe that the rule will have significant negative effects, others believe the effects will be minimal or positive. These effects were described both qualitatively and quantitatively in the Social and Economic Factors section of Chapter 3 of the DEIS. Because most of the effects could not be quantified, it was not possible to estimate the net effect on the national economy.

The economic effects on amenity uses (such as recreation) and commodities other than timber were described qualitatively in the DEIS (pp. 3-160 through 3-182 and 3-192 through 3-222). Since inventoried roadless areas are concentrated in some geographic areas, the economic effects also tend to be concentrated in those areas. Because of the public concern raised about national economic effects, the FEIS includes a more detailed discussion of national economic effects in the Social and Economic Factors section.

*Timber.* A number of comments specifically addressed the effects of the proposed rule on timber production and timber prices. The alternatives in the DEIS could result in a reduction in the total National Forest System timber harvest ranging from 3% to 4% (DEIS pp. 3-182 through 3-191). The reduced harvest is likely to be replaced through a combination of increased harvest on other ownerships and increased imports. The change in harvest is not expected to affect timber prices, and

the percentage change in imports would be negligible.

Per capita wood consumption in the U.S. has been relatively stable at 75 cubic feet per person per year. Total consumption has been growing because of increased population. Changes in the domestic supply of timber are accompanied by a number of economic adjustments. The market response to the reduction in harvest on public lands in the 1990s has included increased imports of softwood lumber from Canada and increased harvest on private lands in the South. Wood-saving technologies have also been widely adopted in home construction. Increased paper recycling has eased the pressure for more fiber from the forest for paper production. See the *Socioeconomic Specialist Report (May 2000)*, Timber section, pp. F-1 through F-2.

#### *2. The argument that our economy depends on the extraction of natural resources from national forest lands is not sound.*

**Response:** The national economy does not depend on any one commodity from the national forests and grasslands. With declining levels of timber harvest, the contribution of NFS timber to the national economy has declined. However, commodities (including minerals) from the national forests and grasslands continue to make important contributions to the national economy. The alternatives considered in the DEIS and FEIS result in varying levels of change in the flow of commodity and amenity values, as described in Chapter 3, Social and Economic Factors section.

#### *3. The Proposed Rule will cause increases in the costs of housing development.*

**Response:** The value of lumber in the average house accounts for a relatively small proportion of the overall cost of a house, usually less than 5%. Therefore, changes in lumber prices have a minor impact on the cost of houses. Although previous declines in national forest harvest have resulted in increased prices for wood products (particularly softwood sawtimber prices), the estimated changes in timber harvest from the alternatives are not expected to affect wood product prices.

## Subsidized Uses

### *4. The Forest Service should reduce or end subsidies for commercial and recreational users of national forests.*

**Response:** A number of respondents expressed concern about subsidizing commercial and recreational users of the National Forest System. Some respondents expressed concerns that current policies governing commercial uses of the national forests and grasslands do not charge market values for these uses or do not incorporate all expenses relative to timber sales. Others focused on using tax dollars to subsidize recreation uses or other amenity values. Many commercial uses of the national forests and grasslands are managed according to the statutory requirements in various laws. Changes to those laws are the prerogative of Congress.

The rule does not change any existing policies governing commercial or recreational uses of the national forests and grasslands, and therefore this issue is outside of the scope of the analysis.

## Agency Funding and Costs

### *5. The Forest Service could have better spent the money used for the Roadless Area Conservation project.*

**Response:** Controversy over roadless areas has often delayed forest and project planning on the national forests and grasslands. Because 20 years of using a forest-level approach hasn't resolved the issue, the agency believes a national-level approach is the best option for instituting a consistent policy that would reduce the costly delays in the future at the forest level.

### *6. Consider the funds, fees, and services contributed by users to maintain roads and trails.*

**Response:** Fees collected through the fee demonstration program are used to improve or maintain recreation sites, roads, and trails. None of the alternatives would affect ongoing efforts to maintain roads and trails through use of fees or by volunteer organizations. Rather, the action alternatives would prohibit road construction and reconstruction in inventoried roadless areas. None of the alternatives considered in the DEIS close any existing roads or trails.

### *7. Money currently spent on road maintenance should be spent on facilities upkeep.*

**Response:** Several respondents provided comments on the funding for road maintenance. While some emphasized the need to focus scarce resources on maintenance, other believed those funds could be better used for other activities. The Forest Service has a responsibility to maintain roads to a standard that protects public safety and minimizes environmental damage. The agency is focusing more attention on maintaining the existing road system within budget constraints. As described in the DEIS (p. 3-17), the backlog in road maintenance and capital improvement was estimated at \$8.4 billion.

### *8. The Forest Service should address how declines in revenues from commodity uses will affect the agency and its ability to implement this proposal.*

**Response:** The Forest Service is generally not dependent on revenues for operating funds. Rather, funds appropriated by Congress are the main source of agency funding.

The agency is allowed to retain a portion of some revenues for activities such as reforestation and environmental mitigation. However, most revenues are returned to the General Treasury, or to the States under revenue-sharing formulas determined by payments to States.

### *9. The Forest Service should analyze the effects of the proposed rule on agency costs due to prohibitions. The analysis should take place in roadless areas where "high risk" conditions call for large amounts of money for "risk reducing" activities.*

**Response:** The effects of the proposed rule on agency costs are described in the DEIS (pp. 3-200 through 3-201) and the FEIS (Chapter 3, Social and Economic Factors section).

### *10. The Forest Service should explain the statement, "overall agency costs are expected to remain the same" under Alternatives 2 through 4. They should explain how managing 60 million fewer acres would not affect agencies cost.*

**Response:** The Forest Service will continue to manage all NFS lands affected by the roadless rule.

The effects on agency costs from prohibitions are expected to be minor. The potential reduction in timber sales will reduce sale preparation and other planning costs on sales that would have been offered from inventoried roadless areas. Other areas including but not limited to planning, fuel treatments, and road construction would only experience minor effects (DEIS p. 3-200).

## State and Rural Communities

### *11. Reductions in payments to States will further degrade local economies. Alternative revenue-sharing formulas should be considered.*

**Response:** Numerous respondents raised a concern about reductions in revenues to local communities as a result of the proposed rule. The proposed rule would reduce payments to States between \$1.4 and \$4.2 million per year as a result of reduced timber harvest. This reduction is between 1% and 3% of average payments to States from National Forest System receipts in the last 4 years. Although these declines are relatively small, the agency recognizes that payments to States associated with timber harvest have declined over the past decade, and have had serious economic impacts on some local economies (DEIS p. 3-187). In some cases, reductions in payments to States are offset partially by payments in lieu of taxes. Supplemental payments are being made to parts of California, Oregon, and Washington to offset reductions in harvest associated with the Northwest Forest Plan.

Several respondents suggested alternative approaches to providing a more stable flow of payments to States. The U.S. Congress is considering legislation to provide stable levels of payments to States that are not tied to current commodity production levels.

### *12. The proposed rule will adversely impact small communities, local employment and businesses—effects that were not adequately addressed. This may lead citizens to view the Forest Service as their enemy. Mill closures and unemployment due to National Forest timber being unavailable will be hard to accept in communities surrounded by vast stands of that timber.*

**Response:** The DEIS included a list of communities that would potentially be affected by estimated reductions in timber harvest resulting from the

proposed rule and the alternatives (DEIS pp. 3-212 through 3-214). Effects on social and economic factors were described (DEIS pp. 3-160 through 3-222). Public comments and internal reviews were used in updating the list of communities in the FEIS. In addition, a section on affected communities dependent on mining has been added in the FEIS. An Initial Regulatory Flexibility Analysis was also conducted to assess impacts on small businesses, and was available for public comment. The Final Regulatory Flexibility Analysis reflects input from the public comments. These analyses acknowledged that some small communities and businesses could be adversely affected by some of the alternatives analyzed.

### *13. The proposed rule should provide “community stability” as required by 36 CFR 221.3(a)(3), the Senate Report on the 1897 Organic Act, and the Use Book.*

**Response:** Section 36 CFR 221.3(a)(3) states: “Provide, so far as feasible, an even flow of national forest timber in order to facilitate the stabilization of communities and of opportunities for employment.” As discussed in Chapter 3, Forest Dependent Communities, the ability of the Forest Service to provide “community stability” has been a source of debate even when harvests from national forests were much greater than current levels. Changes in the timber industry, combined with declines in national forest harvest, have made it increasingly difficult for the agency to assure a flow of raw materials to specific local communities. The DEIS on pp. 3-114 through 3-116 discussed the effects of the alternatives on timber harvest levels. All the alternatives, except Alternative 1, No Action, would result in a small reduction of timber harvest levels. This reduction is likely to affect some communities more than others. However, nationally there would be little noticeable effect.

### *14. The suggestion that a government payment or rural development funding can be made to areas negatively impacted by the loss of logging revenue may or may not be acceptable.*

**Response:** Some respondents expressed a concern that government payments are not an acceptable solution to reductions in payments to States from reduced timber receipts. Others expressed a concern that attempts to mitigate community effects from this proposal would reduce funds available for other

communities. The Forest Service has programs that may be used to assist communities affected by the roadless rule. The U.S. Congress is considering legislation to provide stable levels of payments to States that are not tied to current commodity production levels.

***15. The proposed rule will negatively impact the West.***

**Response:** The majority of the inventoried roadless areas are in the western United States. The costs and benefits associated with changes in management of these areas will therefore disproportionately occur in the west. The Social and Economic Factors in Chapter 3 of the DEIS and FEIS describe the effects of the alternatives and their geographic distribution.

***16. The Forest Service should not analyze single communities as if they were based on stand alone economies.***

**Response:** The analysis used to assess the resiliency of communities (pp. 3-209 through 3-222 of the DEIS) analyzed the communities by comparing the economic diversity of their County in comparison to the surrounding Counties within their region as defined by the Bureau of Economic Analysis. Therefore, the analysis did not treat the communities as if their economies are isolated from the surrounding economy.

***17. The Forest Service should conclude that the economic and social impacts of the proposed rule on timber dependent communities will be minimal.***

**Response:** The effects on timber dependent communities were described in the DEIS (pp. 3-209 through 3-222) and in the Social and Economic Factors section of Chapter 3 of the FEIS. Although the national level effects of reduced timber harvest are small relative to total U.S. production (less than 0.5%), the effects are not evenly distributed. Therefore, some communities may be adversely affected by the roadless rule.

## **Economic Analysis**

***18. The Forest Service underestimated the job losses by including only direct effects.***

**Response:** Although the summary of the DEIS showed only direct jobs associated with declines in

timber harvest, the more detailed analysis of job impacts from reductions in timber harvest estimated both direct and total job and income effects (DEIS pp. 3-186 through 3-187). Updated estimates of job effects are included in the Timber Harvest section of the Social and Economic Factors portion of Chapter 3 of the FEIS.

***19. The proposed rule and supporting environmental analysis should call for prohibitions in only those areas where the benefits of protection exceed the costs.***

**Response:** The economic analysis included in the Social and Economic Factors of the DEIS, Chapter 3, described the trade-offs associated with the alternatives examined. The focus of the analysis was generally at the regional level. Because of the continuing controversy over management of inventoried roadless areas, the agency believes a national policy is appropriate. Because of the variability in local conditions, it was determined that the benefits and costs of prohibiting activities other than timber harvest and road building could not be adequately analyzed at the national level. The appropriateness of other uses of roadless areas will be determined at the local level, and would include a consideration of the benefits and costs associated with those uses.

***20. The Forest Service should clarify miles of roads across NFS lands and payments to States figures in the DEIS.***

**Response:** The DEIS discussed the miles of roads on p. 1-3, and payments to States were addressed in Chapter 3, pp. 3-182 through 3-191.

***21. The claim that State timber affects only 3% of the economic viability of Montana is not true.***

**Response:** The DEIS did not attempt to estimate State level impacts. Economic impacts from reduced timber harvest are summarized by State in the FEIS (Appendix B).

***22. The Forest Service used biased methodologies and low baselines to address the timber impacts of the proposed action by not including job loss created by conservation policies and political motivations over the past 10 years.***

**Response:** There are a variety of factors influencing changes in National Forest System policies. The timber baseline developed for the DEIS was based on the timber program between 1996 and 1999. Those years were chosen because the agency believes they most accurately reflect the likely future described for the “no action alternative.” Timber harvest levels of the early 1990s are not likely to be achieved in the near future. Although the agency recognizes that past declines in timber harvest have had serious economic impacts in some communities, those effects cannot be attributed to the roadless rule. The potential impacts on communities of the roadless rule are described in the DEIS (pp. 3-209 through 3-222) and in Chapter 3, Social and Economic Factors in the FEIS.

**23. *The Forest Service should provide a reference for statements on page 3-9 of the DEIS and disclose any associated cumulative effects.***

**Response:** The DEIS (p. 3-9) stated, “The increasing demand for wood fiber will be met through a combination of international trade and domestic supply.” Declines in Federal timber supply in the last decade were replaced by increased imports and increased harvest from other domestic sources (Martin, R.M. and D.R. Darr. 1997 Market Responses to the U.S. Timber Demand-Supply Situation of the 1990s. Forest Products Journal 47(11/12): 27-32). Similar responses can be expected in the future. Economic cumulative effects are described at the end of the Social and Economic Factors in Chapter 3 of the FEIS.

**24. *The Forest Service should not have made the statement “the reduction in National Forest harvest resulting from the prohibitions are not likely to affect timber prices.”***

**Response:** The declines in timber harvest on National Forest System lands associated with the range of alternatives analyzed would account for less than 0.5% of total U.S. timber production. Therefore, no effect is expected on timber prices.

**25. *The Forest Service should consider not only the impact of the roadless plan on total U.S. production, but also the impact on the Tongass National Forest individually.***

**Response:** The impacts on the Tongass National Forest were addressed in the DEIS, pp. 3-226

through 3-239, and in the FEIS, Chapter 3, Effects of the Tongass Alternatives.

**26. *The Forest Service should consider whether or not passive values of resources should be quantified.***

**Response:** Some respondents believed the analysis did not adequately account for the value contributed by standing trees, particularly in terms of ecological values. Others believe that passive values should not be considered in the analysis. The Forest Service treats both commodity and amenity values (including ecological values) as equally important in determining appropriate management strategies. The DEIS qualitatively described the passive values associated with inventoried roadless areas, while the commodity values are addressed in both quantitative and qualitative terms (DEIS pp. 3-161 through 3-166, and 3-182 through 3-197).

**27. *The DEIS Summary is inconsistent in its portrayal of the relationship between jobs and reduced timber harvest.***

**Response:** There was some confusion resulting from comparing information shown in the DEIS Summary. The Summary presented a subset of information from the DEIS. In particular, estimates of NFS timber related employment were shown, but not estimates of reductions in timber harvest. In order to compare jobs per MMBF of harvest in each alternative, the job effects shown in the Summary must be compared to the harvest effects (DEIS pp. 3-183 through 3-191), not to the offer volumes shown in the Summary. We have clarified this in the FEIS.

**28. *The Forest Service should consider the impacts on jobs indirectly related to the timber industry.***

**Response:** The Forest Service recognizes that other industries are related to the timber industry. However, it was not possible to trace all of the potential linkages in the analysis of effects. These types of effects are most likely to be important in the same regions where the greatest declines in timber harvest are estimated to occur.

**29. *The Federal government should quantify the full social and economic impacts on mining jobs and States related to mineral exploration, development, and production, including undiscovered resources.***

**Response:** The FEIS contains an expanded discussion of the social and economic effects of the alternatives based on information provided in the public comments and from additional Forest Service information. The DEIS qualitatively discussed the possible range of effects on exploration and development (pp. 3-192 through 3-197) for locatable, leasable, and saleable minerals. The values of undiscovered resources by region were addressed in the DEIS, pp. 3-192 through 3-197 and Tables 3-49 and 3-50 on p. 3-196. Although these undiscovered resources have high potential value, assessing future development and economic impacts would be highly speculative and was not attempted in the DEIS or FEIS.

**30. The Forest Service should address discrepancies in the tables in the Draft EIS p. 3-213, which do not include working sawmills in Gunnison, UT or Wellington, UT.**

**Response:** We have incorporated this information on the sawmill status into the FEIS.

**31. The Forest Service should clarify the controversial issues surrounding roadless that would make the transaction costs high, as mentioned in the DEIS.**

**Response:** The elements of controversy surrounding management of roadless areas were summarized in Chapter 1 of the DEIS (pp. 1-3 and 1-4) and in Chapter 1 of the FEIS.

## Regional and Global Impacts

**32. The DEIS should include an evaluation of the impact of displaced usage on all land values and all forest lands, including States and other ownerships. The Forest Service should address the impacts of the proposed rule on the global environment, forests, cultures, relations, markets and economies including trade surplus and deficit.**

**Response:** The DEIS discussed the availability of substitute opportunities for recreation (p. 3-168) and for timber harvest (p. 3-187). It also recognized that reductions in timber harvest could result in an increase in imports. The cumulative effects section of the FEIS Chapter 3 includes an expanded discussion of the effects of the alternatives on other

land ownerships in the United States and the resulting global implications.

## Unemployment and Job Training

**33. Families who rely on the forest as a source of income should adapt with the changing job market.**

**Response:** In a changing economy, people are often faced with changing job markets. The ability of any individual to adapt to these changing circumstances depends on many factors, such as transferable skills, re-training opportunities, and family ties to certain geographic areas. The DEIS addressed potential job losses associated with reductions in timber harvest in inventoried roadless area (pp. 3-186 through 3-187), and identified communities that might be affected by these harvest declines (pp. 3-211 through 3-220). The DEIS also discussed possible mitigation options (p. 3-243) that could be considered to address people and communities most affected by the alternatives. We have updated this analysis in the FEIS.

**34. The Forest Service should consider the impact of job loss for the Forest Service employees.**

**Response:** The alternatives examined in the DEIS are expected to have minor effects on Forest Service employment, with one exception. Applying the prohibitions to the Tongass National Forest may have localized adverse impacts on local communities dependent on Forest Service jobs. This topic is specifically addressed in Chapter 3 of the FEIS in the Timber Harvest Section, Social and Economic Factors and in the Effects of the Tongass National Forest Alternatives section.

**35. The Forest Service should address the impacts of changes in timber harvest quantity on unemployment rates and help financially with relocation and/or education.**

**Response:** A number of respondents suggested providing assistance for individuals affected by the roadless rule. Some options for assistance, such as using dollars saved from decreased road building to help with relocation and/or education, are not possible to implement.

The Forest Service does not pay for the cost of road building for timber sales. The timber purchaser either reflects the cost of road construction in the bid price and does the work, or opts for the Forest Service to

construct the roads and pays more for the timber. Other options, such as support for job re-training programs, could be used to address dislocation of timber jobs. The DEIS and FEIS discussed mitigation options that could assist communities affected by changes in resource flows from the national forests and grasslands. Any mitigation proposals would be developed in consultation with the Congress.

## Recreation and Tourism

### *36. The Forest Service should address whether the tourism sector would be enhanced or harmed by the roadless rule.*

**Response:** Some respondents believe the prohibitions in the alternatives would be beneficial to maintaining an environment that attracts tourism. Others believe the alternatives would limit opportunities for tourism if road access becomes limited. Others feared tourism is a seasonal industry and will not sustain community economies. The DEIS discussed the importance of tourism in the U.S. economy, and as a source of economic activity in many communities associated with national forests and grasslands (pp. 3-126, 3-168 through 3-169, 3-172). The alternatives examined do not result in any major shifts in the recreation opportunities available in the short-run, and therefore should have minimal effects on the tourism sector.

Some concerns were raised related to off-highway motorized recreation. The proposed rule does not change existing access for off-highway motorized recreation. Also, the alternatives do not affect access or construction of motorized trails. Therefore, no adverse economic effects are expected to occur related to off-highway motorized recreation.

### *37. The Forest Service should inform snowmobilers of the economic disaster and infringement of their freedoms created by the proposed rule.*

**Response:** Snowmobile use would not be affected by any of the alternatives, since none of the alternatives affect existing access to inventoried roadless areas.

### *38. The proposed rule leaves our forests susceptible to catastrophic fires resulting in loss of wildlife habitat and pollution of air and water, which hurts the tourism industry.*

**Response:** There would be a slight decrease in the ability to meet the Forest Service goal of reducing uncharacteristic wildfire threat; and a slight increase in the number of wildland fires that cause uncharacteristic effects (FEIS, Chapter 3, Fire Effects section). When fires are burning, certain types of tourism may be affected, but the effects of fire on tourism are expected to be minimal.

### *39. The Forest Service should address the socio-economic impacts of the proposed rule on outfitters and guides working in roadless areas.*

**Response:** Outfitters and guides are addressed in the Social and Economic Factors of the DEIS (pp. 3-169 through 3-172) and FEIS, as well as in the Initial Regulatory Flexibility Analysis and Final Regulatory Flexibility Analysis.

### *40. The Forest Service should display the financial contribution of roaded vs. the unroaded recreation to local economies in the Draft EIS, including revenue generated from hunting and fishing.*

**Response:** Recreation use data distinguishing between roaded and unroaded use are not available. Therefore, such an analysis was not possible.

## Legal Compliance

### *41. The DEIS should include a cost-benefit analysis to meet the requirements of NEPA; and*

### *42. The proposed rule should comply with Executive Order 12866.*

**Response:** The DEIS and FEIS include an economic analysis in the Social and Economic Factors section of Chapter 3. Both qualitative and quantitative measures were used to describe the economic effects of the alternatives.

Executive Order 12866 requires that a cost-benefit analysis be performed in association with the rulemaking process. In addition to the economic analysis contained in the DEIS and FEIS, a separate cost-benefit analysis was prepared. The Forest Service made the cost-benefit analysis for the proposed rule available during the public comment period, as noted in the project's Federal Register notice and on its web site. A cost-benefit analysis will also be completed for the final rule.

**43. The Forest Service should not violate the Regulatory Flexibility Act and should analyze the impacts of the proposed rule on motorized recreation in its Regulatory Flexibility Analysis.**

**Response:** The agency completed an Initial Regulatory Flexibility Analysis in accordance with the Regulatory Flexibility Act. This analysis was available for public comment. A Final Regulatory Flexibility Analysis will also be completed. Both analyses use Small Business Administration (SBA) definitions of “small entities” and address possible effects of the rule.

**44. The Forest Service should require local forest planners to perform a Regulatory Flexibility Analysis during forest plan revisions and amendments.**

**Response:** The Regulatory Flexibility Act applies to promulgation of certain rules, not to forest and grassland planning and decision-making. However, the Forest Service routinely assesses impacts of its forest and grassland-level management decisions on the local economies and affected communities.

**45. The Forest Service should comply with Executive Order 12612.**

**Response:** Executive Order 12612 (Federalism) requires Federal agencies to assess the effects of their proposals on other levels of government. The agency considered the proposed rule under the requirements of the E.O. and made a preliminary assessment that the proposed rule will not have substantial direct effects on the States, on the relationship between the national government and the States, or the distribution of power and responsibilities among the various levels of government. (See preamble of the proposed rule, DEIS p. A-24.) The agency will re-assess these requirements and report their findings in the preamble to the final rule.

**46. The Forest Service should consider that protecting the environment early on is more cost effective than being forced to later by the courts.**

**Response:** The Forest Service makes every effort to comply with the wide range of laws, regulations, and policies governing public land management whenever it makes a management decision.

**47. The Forest Service should include the costs of litigating this proposal in its agency costs; and**

**48. The Forest Service should not base scientific decisions on the possibility of reducing the costs of potential litigation (DEIS Table S-4).**

**Response:** Actual litigation costs can only be known after final disposition of the case. The DEIS provided a qualitative description of future cost changes expected under the alternatives (DEIS p. 2-34). The Forest Service has not quantified future litigation costs, but the potential controversy that would result from appeals and litigation is an appropriate consideration in the comparison of alternatives for the rule.

**49. Monies should be collected and kept in trust as a long-term environmental insurance to pay for environmental cleanup following extractive activities.**

**Response:** A number of respondents provided suggestions on alternative methods to fund restoration activities, such as establishment of trust funds to cover the cost of environmental rehabilitation. Development of such funding mechanisms would require Congressional action and therefore is outside the scope of the proposed rule.

## Other Concerns

The Forest Service considered these concerns and suggestions but did not analyze them in detail for the reasons given below. These concerns are in three categories.

**50. The Forest Service should provide incentives in areas like trail-building, tree planting, and wildlife habitat improvement;**

**51. The Forest Service should institute a policy aimed at reducing the consumption of the resources that would potentially be extracted from the lands;**

**52. The Government should ensure that Wilderness and potential mineralized areas do not overlap, as in evaluating potential Wilderness areas during the RARE II process;**

**53. The Forest Service should turn public lands over to the Montana Department of Lands to be managed. All the moneys received should go to**

*fund State public education within the primary, elementary, and high school systems;*

*54. The Forest Service should tax certain individuals in order to pass this proposed rule;*

*55. National forest timber should be sold "when the price is right" and not offered on a set schedule;*

*56. 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;*

*57. 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;*

*58. Consumers should be taxed on the purchase of nonrenewable resources to be consumed. This would aid in lowering the consumption of nonrenewable resources;*

*59. The Government should consider charging a Federal land use fee good for entry to Federal lands and then charge additional fees for special uses such as hunting, fishing, campgrounds, etc.;*

*60. The Forest Service should charge fees based on the amount of damage a particular activity causes; and*

*61. The Forest Service should not attempt to counteract the macroeconomic forces causing most job loss in the timber sector with Federal timber flow policies.*

**Response:** These concerns address options and alternatives for land and resource management of the National Forest System lands in general rather than roadless areas in specific. They do not pertain to the purpose and need, proposed action, alternatives, or effects in the Roadless Area Conservation EIS. Therefore they are beyond the scope of this analysis.

*62. The Forest Service should address the relation between its lack of funding for road maintenance and continued funding for International Forestry Programs;*

*63. The Forest Service should explain whether the interim moratorium of no road building or maintenance saved money;*

*64. The Forest Service should address how it accounts for "below cost" timber sales (independent of this roadless area conservation proposal); and*

*65. Each timber sale should include the potential loss of tourist revenue in Alaska (in quantifiable terms) and a risk assessment for the potential loss of revenue for cruise ships.*

**Response:** These concerns suggest analysis or study that would not be required in or pertinent to addressing the purpose and need, alternatives, or impacts of the roadless area conservation proposal. Therefore they are beyond the scope of this analysis.

*66. This proposed plan does not violate the Forest and Rangeland Renewable Resources Planning Act. It balances the economic cost to loggers and communities that have traditionally depended upon logging for their livelihood with the environmental benefits of a prohibition on logging activities;*

*67. With adequate funding the Forest Service could manage and enforce the laws already on the books; and*

*68. The public should appeal for sustained increases in funding for the Forest Service so that they can continue to do the jobs expected of them. A side effect of increased funding to the Forest Service would be the betterment of local economies near forests and grasslands.*

**Response:** These concerns are observations on economic aspects of forest management generally, or specific to the rule, and do not require further response by the agency.

*End of Economics Section*